

MEDIA FREEDOM AND PLATFORM CAPTURE:

THE EXPERIENCE OF KYRGYZSTAN





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MEDIA FREEDOM AND PLATFORM CAPTURE: THE EXPERIENCE OF KYRGYZSTAN

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**Kyrgyzstan, Bishkek
2026**

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Abstract

This study examines the impact of digital platforms on media freedom and the operations of newsrooms in Kyrgyzstan. The purpose of the study is to analyze how independent media outlets in Kyrgyzstan perceive their interaction with digital platforms, what adaptation strategies they employ, and how platform regulation combined with national law enforcement practices affect editorial autonomy and media sustainability.

The study relies on a qualitative methodology, incorporating a focus group with media professionals alongside a survey of 16 media projects that actively utilize social platforms to distribute socially significant content. The scope of this research covers key areas such as internal editorial decision-making, experiences with content blocking and appeal mechanisms, algorithmic adaptation and its influence on newsroom workflows, the psychological perception of platform dependence, sustainability strategies, collaborative dynamics between media organizations, and the degree of editorial agency maintained under conditions of platform reliance.

The findings indicate that non-state media outlets in Kyrgyzstan operate under a system of dual dependence: they are bound by the algorithmic infrastructure of global platforms on one hand, and a national legal and law enforcement environment characterized by expanding state control mechanisms on the other. This dual pressure poses severe risks to freedom of expression, editorial autonomy, and the financial sustainability of independent media. The insights compiled in this study are intended to serve researchers, journalists, international organizations, and policymakers working in the fields of media freedom and digital regulation.

This study was conducted in 2026 by the Public Foundation “Media Policy Institute” with the support of CAPS Unlock. The views expressed in this paper are those of the authors alone and do not represent the institutional position of CAPS Unlock or any organizations with which the authors are affiliated. The publication of this material does not imply endorsement of the analysis, findings, or recommendations contained herein.

List of abbreviations

AI	– Artificial Intelligence
BBC	– British Broadcasting Corporation
Big Tech	– Major technology companies (typically including Meta, Google, Amazon, Apple, Microsoft, etc.)
CC	– Criminal Code
CDA	– Communications Decency Act
DMA	– Digital Markets Act
DSA	– Digital Services Act
EFCSN	– European Fact-Checking Standards Network
EMFA	– European Media Freedom Act
EU	– European Union
EU Code of Practice on Disinformation	– European Union Code of Practice on Disinformation
GDPR	– General Data Protection Regulation
GKNB	– State Committee for National Security (of the Kyrgyz Republic)
KR	– Kyrgyz Republic
Meta	– Meta Platforms, Inc. (a multinational technology conglomerate, owner of Facebook, Instagram, and Threads)
NCO	– Non-Commercial Organization
NGO	– Non-Governmental Organization
OSCE	– Organization for Security and Co-operation in Europe
OSCE RFoM	– Organization for Security and Co-operation in Europe Representative on Freedom of the Media
PF	– Public Foundation
RSF	– Reporters Without Borders (Reporters sans frontières)
SMM	– Social Media Marketing (marketing and promotion on social media networks); within the context of this study, also used to denote an SMM specialist
UN	– United Nations
UNESCO	– United Nations Educational, Scientific and Cultural Organization
USA / US	– United States of America
VLOP	– Very Large Online Platform

Introduction

Over the past two decades, the global media environment has undergone a profound transformation driven by the rise of Very Large Online Platforms (VLOPs) and shifting dynamics in information production, distribution, and consumption. While newsrooms traditionally played the central role in shaping the public agenda, access to news and socially significant content today is largely mediated through VLOPs, including social networks, video-hosting services, and other digital interfaces. These platforms have evolved from mere distribution channels into a foundational infrastructure that dictates the visibility and accessibility of content through algorithmic ranking and moderation systems. Consequently, digital platforms exert a substantial influence not only on editorial practices and public access to public-interest information, but also on the economic sustainability of independent media.

In academic and expert literature, algorithmic reliance is increasingly conceptualized as “platform capture”—a form of structural media dependence on Big Tech companies regarding audience access, content distribution, advertising revenue, and security. Concurrently, international debates are intensifying around the necessity of digital platform regulation, focusing on content moderation liability, algorithmic transparency, and the protection of public-interest journalism. The repercussions of platform dependence are particularly acute in countries with restrictive media environments and vulnerable democratic institutions, where digital platforms serve as the primary arena for circulating independent journalistic content.

Kyrgyzstan represents a compelling case study of this transformation. Against the backdrop of a deteriorating environment for freedom of expression and media freedom, the country’s non-state media outlets operate under dual pressure: mounting domestic law enforcement restrictions on one side, and an escalating dependence on global digital platforms as their primary channels for information distribution on the other. Within this framework, a critical research question emerges: how do newsrooms perceive their digital dependence, what strategies do they devise in response to algorithmic pressure, and is it possible to establish institutional agency under conditions of such structural vulnerability?

The methodological foundation of this study relies on a qualitative approach, incorporating a focus group with non-state media professionals alongside a survey of 16 media projects in Kyrgyzstan that actively utilize digital platforms for content distribution.

The analytical section of the study is structured into several thematic blocks, each reflecting distinct facets of how newsrooms interact with platform infrastructure. The concluding section offers targeted recommendations addressed to the Jogorku Kenesh (Parliament) and state authorities of the Kyrgyz Republic, independent media outlets, civil society organizations, international donors, and the digital platforms themselves.

Appendix 1 presents the insights from expert discussions conducted by the Public Foundation (PF) “Media Policy Institute” during a dedicated UNESCO training workshop focused on freedom of expression, content moderation, and media platform dependence. These materials supplement the main study with practical observations from media¹ and civil society representatives regarding algorithmic dependence, content monetization challenges, platform linguistic asymmetry, and the limited availability of platform-driven support mechanisms.

¹ Two-day training workshop in Bishkek and Osh dedicated to freedom of expression, content moderation, and collective approaches to digital platform regulation, conducted by the Media Policy Institute with the participation of media and NGO experts within the framework of the UNESCO project “Social Media for Peace,” funded by the European Union. Media Policy Institute. (2026, April). Accessed on May 22, 2026, <https://media.kg/news/v-bishkeke-i-oshe-proshli-treningi-po-teme-svoboda-vyrazheniya-moderatsiya-kontenta-i-kollektivnye-podhody-k-regulirovaniyu-cifrovyyh-platform/>.

Literature Review

Transformation of the Global Media Environment

Over the past two decades, the global media environment has undergone a profound, fundamental transformation, altering the core principles of how information is produced, distributed, and consumed. While independent media outlets previously served as the primary intermediaries between events and the public, access to information today is largely determined by Very Large Online Platforms (VLOPs)² — including social networks, marketplaces, video and content sharing platforms, and, increasingly, artificial intelligence-driven services.³ These platforms have expanded far beyond mere distribution channels, effectively shaping the global infrastructure of the information space and concentrating control over its flows.

Data from analytical platforms aggregating industry research confirm the scale of this shift: more than 5 billion people (over 60% of the world's population) are active social media users, spending an average of more than two hours per day on them and consuming content predominantly via mobile devices. Furthermore, this audience is concentrated across a small number of global platforms with multi-billion user bases.⁴ Given that a significant proportion of social media posts on socially relevant topics contain disinformation⁵, the mediated nature of information access becomes increasingly critical, as does the role of platforms as the primary point of contact between users and news or informational content.

According to the Digital News Report 2025 by the Reuters Institute for the Study of Journalism,⁶ approximately one-third of the global audience regularly accesses news via Facebook and YouTube, while about one-fifth does so through Instagram and WhatsApp. These metrics demonstrate that news consumption is now predominantly mediated through the infrastructure of private technology corporations.

Despite assertions of neutrality⁷, VLOPs in practice promote content to serve their own commercial interests, undermining their declared principle of neutrality. Concurrently, their position as the primary suppliers of curated information establishes them as pivotal actors in the contemporary information ecosystem and substantially impacts the shaping of public opinion. Beyond their ability to influence content through moderation policies, platforms also determine precisely what information users see and at what moment. This is driven by algorithmic recommendation systems that select and rank information, thereby dictating what enters the users' field of vision and potentially restricting access to a diverse range of perspectives.

2 The term VLOP (Very Large Online Platform) was first legally codified and defined in the European Union's Digital Services Act (DSA).

3 As of May 2026, the list of Very Large Online Platforms (VLOPs) designated by the European Commission under the Digital Services Act (DSA) encompasses more than 20 services. These include: social networks Facebook, Instagram, TikTok, X (Twitter), LinkedIn, Snapchat, Pinterest; marketplaces Amazon Store, AliExpress, Zalando, Shein, Temu; video and content platforms: YouTube, Wikipedia; the instant messaging service WhatsApp; Google/Apple services: Google Play, Google Maps, Google Shopping, Apple App Store; and the travel platform Booking.com. European Commission. *Supervision of the designated very large online platforms and search engines under DSA*. Accessed on May 11, 2026, <https://digital-strategy.ec.europa.eu/en/policies/list-designated-vlops-and-vloses>.

4 ShortsiIntel. (2026, February). *Global Social Media Usage Statistics*. Accessed on May 11, 2026, <https://www.shortsintel.com/statistics/global-social-media-usage>.

5 Science Feedback. (2025, September). *What our first measurement says about disinformation on major platforms in Europe*. Accessed on May 11, 2026, <https://science.feedback.org/first-measurement-disinformation-major-platforms-europe/>.

6 Reuters Institute Digital News Report 2025. Accessed on May 11, 2026, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital_News-Report_2025.pdf

7 Reuters. (2016, September). *Facebook CEO says group will not become a media company*. Accessed on May 11, 2026, <https://www.reuters.com/article/us-facebook-zuckerberg-idUSKCN1141WN/>.

Global platforms as a source of news

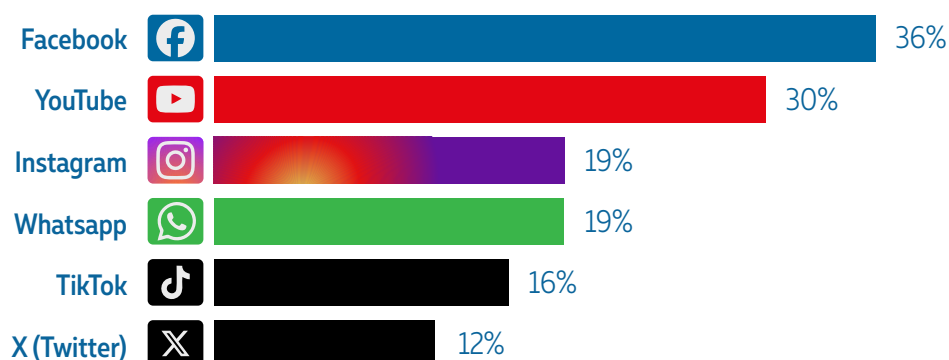


Figure 1. Share of the global audience regularly receiving news via global platforms.

Source: Reuters Institute Digital News Report 2025.

As the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression noted, "...content aggregators and news sites select information for users not by the relevance or gravity of events but on the recommendation of artificial intelligence applications which predict users' interests and news preferences... Consequently, artificial intelligence plays a major but usually hidden role in curating information for users and in determining even the background information that they will consciously perceive."⁸ According to an Amnesty International report, the recommendation systems of social platforms can steer public discourse by promoting certain topics while suppressing others. Because their objective is to maximize user retention, they frequently prioritize content that triggers strong emotional responses.⁹ In this context, it is notable to highlight a high-profile March 2026 social media addiction lawsuit, in which a US court found Meta [the parent company of Instagram and Facebook] and Alphabet [the parent company of the YouTube video service] liable for causing harm to a minor user. The court confirmed that the platforms' design features induced an addiction as potent as that of cigarettes or digital casinos, leading to a deterioration in her mental health.¹⁰

Algorithmic systems optimized for engaging and sensationalist content can contribute to the distortion of the public information environment and the erosion of media pluralism. This stands in contradiction to the principles enshrined in international human rights instruments, particularly in materials from the OSCE RFoM, which assert that public interest and media pluralism must be protected from distortion, disinformation, and societal division.¹¹

⁸ David Kaye. (2018, August). *UN Special Rapporteur on the Promotion and protection of the right to freedom of opinion and expression report to the UN General Assembly*, Accessed on May 11, 2026, <https://digitallibrary.un.org/record/1643488?ln=en&v=pdf>.

⁹ Amnesty International. (2025). *Breaking Up With Big Tech*. Accessed on May 11, 2026, https://www.amnesty.fr/wp-content/uploads/2025/10/aL_-MmGNHVfTO09W_Rapport_Breaking_Up_With_Big_Tech.pdf#:~:text=Social%20media%20platforms%20shape%20what,next%20frontier%20of%20technological%20development.

¹⁰ The New York Times. (2026, March). *Meta and YouTube Found Negligent in Landmark Social Media Addiction Case*. Accessed on May 11, 2026, <https://www.nytimes.com/2026/03/25/technology/social-media-trial-verdict.html>.

¹¹ Organization for Security and Co-operation in Europe. (2025). *Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*. Vienna: OSCE. P. 7. Accessed on May 11, 2026, https://rfom.osce.org/sites/default/files/f/documents/e/3/598525_1.pdf.

Under the dominant position of platforms that primarily pursue their own commercial objectives, news media organizations find themselves caught in an algorithmic “trap” set by platforms, forced to adapt to the commercial logic of content distribution. In the publication *Safeguarding Media Freedom in the Age of Big Tech* by the OSCE Representative on Freedom of the Media (OSCE RfOM, 2025)¹², this predicament is conceptualized as “platform capture”. This is defined as a form of structural media dependence on Big Tech companies regarding audience access, content distribution, advertising revenues, digital infrastructure, and security.¹³ Very Large Online Platforms (VLOPs) command the vast majority of the online audience for newsrooms and remain a critical driver for potential growth in viewership and, consequently, media revenue.

Within the same publication, the concept of platform capture is also utilized to explain the platforms’ economic model, which similarly renders newsrooms dependent on the algorithmic distribution of user attention. User engagement — measured via clicks, watch time, and virality¹⁴ — is converted into the primary metric of content “relevance”. Consequently, the financial sustainability of newsrooms becomes intrinsically linked to this algorithmic allocation of audience attention. By prioritizing sensationalist and emotionally charged content¹⁵ over hard news and socially significant events, algorithms engender a situation in which newsrooms are forced to oversimplify or curtail public-interest reporting.¹⁶ Furthermore, platform capture manifests in the media’s mediated access to the advertising market which, according to research, has led to a decline in media revenue and viability.¹⁷

In their attempts to preserve editorial autonomy, independent media outlets find themselves embedded within an ecosystem whose rules are dictated by multinational technology corporations. Their algorithms determine which content users will see and which will remain invisible, while content moderation mechanisms often remain opaque, subject to sudden changes, and frequently unpredictable.¹⁸ Cases of automated moderation errors are not uncommon; even when content strictly aligns with the platforms’ own rules, media standards, and international norms, it can be removed, demonetized, or the account itself can be banned.¹⁹ A prime example of this is Meta’s removal of materials published by the BBC that documented war crimes in Ukraine.²⁰

12 Ibid.

13 Columbia Journalism Review. (2023, February). *The challenge of platform capture*, Accessed on May 11, 2026, https://www.cjr.org/special_report/disrupting-journalism-how-platforms-have-upended-the-news-part-8.php.

14 According to Lee and Umbach, virality is a process in which content achieves rapid and large-scale distribution driven by platform recommendation algorithms, becoming the focal point of user attention and engagement. As a rule, virality is short-lived and fragmented, as it is determined both by the dynamics of constantly shifting trends and the specific characteristics of user communities. Lee J., Umbach J. (2026, February). *The viral turn: rethinking virality in the creator economy on TikTok*. Continuum, 40(2), 319–344. Accessed on May 12, 2026, <https://doi.org/10.1080/10304312.2026.2625794>.

15 Vosoughi S., Roy D., Aral S. (2018, March). *The Spread of True and False News Online* // Science. Accessed on May 12, 2026, <https://www.science.org/doi/10.1126/science.aap9559>.

16 Organization for Security and Co-operation in Europe. (2025). *Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*. Vienna: OSCE. Accessed on May 12, 2026, https://rfom.osce.org/sites/default/files/f/documents/e/3/598525_1.pdf.

17 Technologies Blog. (2021, May). *Publishers in the Era of Platforms: How to Turn Platform Dependency Into a Business Driver*. Accessed on May 12, 2026, <https://blog.iotechnologies.com/news-platform-dependency-opportunities-and-challenges/#:~:text=Other%20well%2Dknown%20challenges%20platform,even%20in%20the%20monstrous%20mess>.

18 Gorwa R., Binns R., Katzenbach C. (2020, February). *Algorithmic Content Moderation: Technical and Political Challenges in the Automation of Platform Governance* // Sage Journals. Accessed on May 13, 2026, <https://journals.sagepub.com/doi/10.1177/2053951719897945>.

19 Organization for Security and Co-operation in Europe. (2025). *Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*. Vienna: OSCE, 37. Accessed on May 13, 2026, https://rfom.osce.org/sites/default/files/f/documents/e/3/598525_1.pdf.

20 BBC. (2023, June). *AI: War crimes evidence erased by social media platforms*. Accessed on May 13, 2026, <https://www.bbc.com/news/technology-65755517>.

According to Meta's policies, the platform removes content — even if it carries public or newsworthy value to some extent — “if the risk of harm (physical, emotional or financial) or direct threats to public safety outweighs the public interest value of keeping it up.”²¹

An additional example illustrating the opacity and vulnerability of platform moderation mechanisms (as the absence of systematic public recording means that chiefly the largest-scale incidents gain notoriety) was documented by Reporters Without Borders (RSF) in Central Asia. In this instance, hundreds of posts by independent media outlets in Kazakhstan and Uzbekistan were removed from Facebook, Instagram, and YouTube following mass fraudulent copyright infringement complaints. These complaints were filed by individuals impersonating representatives of the L'Oréal corporation and well-known journalists. The RSF investigation demonstrated that automated complaint processing mechanisms can be weaponized for targeted censorship of independent media, while the insufficient vetting of such claims leaves platforms highly vulnerable to manipulation and politically motivated attacks²².

Such systematic algorithmic censorship of independent journalism not only restricts the public's right to access alternative information but also undermines trust in digital infrastructure as a space of freedom. Concurrently, despite the media's utilization of available reporting and appeals tools on digital platforms, the efficacy of these mechanisms remains constrained, driven in part by deficiencies in the automated moderation of non-English content.²³ Furthermore, media outlets frequently perceive such restrictions as a normative component of operating within the platform environment. Consequently, institutionalized, collective, and coordinated responses from the media to pressure and censorship by VLOPs are virtually non-existent. Individual cases documented in studies by the PF “Media Policy Institute” concerning the status of freedom of expression in Kyrgyzstan also highlight the non-institutional nature of how these disputes are resolved. For instance, in the 2023 GovoriTV case, the lifting of visibility restrictions (a shadowban) was attributed to informal communication with platform representatives rather than the functioning of formalized appeals procedures. This underscores the weakness of institutional mechanisms designed to protect media rights.²⁴

This combination of platform dependence, opacity of regulations, and weakness of protection mechanisms becomes particularly acute in countries with restrictive media environments and vulnerable institutions. Under conditions where traditional channels of information distribution are narrowing and independent media face political and economic pressure,²⁵ digital platforms become virtually the only remaining space for a public presence.²⁶ However, reliance on platforms does not equate to autonomy: it engenders a new form of structural vulnerability, wherein access to audiences and financial sustainability are contingent upon sudden, opaque algorithmic decisions.

21 Meta. (2024, November). *Our Approach to Newsworthy Content*. Accessed on May 13, 2026, <https://transparency.meta.com/features/approach-to-newsworthy-content/>.

22 RSF. (2026, May). *Central Asia's Digital Nightmare: False Copyright Strikes on Behalf of L'Oréal Used to Censor Independent Media on Social Networks*. Accessed on May 22, 2026, <https://rsf.org/sites/default/files/medias/file/2026/05/BlocageRS.pdf>.

23 Poynter. (2025, April). *Meta is failing to stop dangerous disinformation in the world's most spoken languages*. Accessed on May 13, 2026, <https://www.poynter.org/fact-checking/2025/meta-disinformation-non-english-languages/>.

24 Usenova B. (2023). *Kyrgyzstan. Fictional Reality: Trolling, Discreditation, and “Whataboutism”*. Bishkek: Media Policy Institute, 20. Accessed on May 13, 2026, https://www.media.kg/wp-content/uploads/2023/10/kyrgyzstan.-vymyshlennaya-realnost_-trolling-diskreditatsiya-i-_perevod-strelok_avtor.pdf.

25 Political and economic pressure is understood as a combination of political, legal, and economic influence exerted on independent media, encompassing restrictions on access to information, legislative constraints, economic pressure (including through advertising and funding channels), and the harassment of journalists, as outlined in the Reporters Without Borders (RSF) report on Kyrgyzstan. Reporters Without Borders (Kyrgyzstan). (2025). Accessed on May 13, 2026, <https://rsf.org/en/country/kyrgyzstan>.

26 24.kg. (2023, July). *“Begaim Usenova: For Kyrgyzstan's Journalists, Social Networks Are the Last Refuge of Free Speech.”* Accessed on May 13, 2026, https://24.kg/vlast/269737_begaim_usenova_dlya_jurnalistovkr_sotsseti_poslednee_pristanische_svobodyi_slova/.

Consequently, the transformation of the global media environment presents independent media — particularly in countries with limited guarantees for freedom of expression and media freedom — with a dual challenge: on one hand, they are compelled to adapt to the logic of algorithmic visibility, while on the other, they must preserve professional standards and their public-interest mission. Within this context, the critical question becomes not only the impact of platforms on content, but also how newsrooms perceive and institutionalize their dependence on digital infrastructure.

Global Regulatory Models

Against the backdrop of the growing concentration of power held by VLOPs, various regions across the globe have begun developing their own approaches to digital regulation. The term digital sovereignty²⁷ has become a central element within national and regional digital strategies. As noted by Anu Bradford, a professor of law at Columbia University and an expert in the global economy and digital regulation, three primary models have gradually emerged in global technology regulation policy, each reflecting distinct historical trajectories, political systems, and economic priorities.²⁸

The American model has historically been perceived as market-driven, prioritizing minimal state intervention and relying on market self-regulation. Conversely, the Chinese model is constructed around the concept of the “Great Firewall”, treating the internet as a national infrastructure subject to strict state control.²⁹ This approach blocks access to foreign websites while simultaneously encouraging the domestic adoption and deployment of Chinese platforms. The European model, based on a combination of platform regulation, co-regulation, and self-regulation,³⁰ emphasizes the protection of fundamental rights and democratic institutions within the digital environment. Its objective is to foster fair competition, safeguard privacy, and ensure platform accountability while maintaining interoperability. A critical question that arises within this framework is how to assert sovereignty over a domain explicitly built for borderless exchange without triggering the fragmentation of the global internet.

The American Approach to Digital Platform Regulation and Section 230 of the Communications Decency Act (CDA)

The American approach to digital environment regulation has traditionally been grounded in the principle of minimal state intervention. Under this framework, regulatory efforts have concentrated on the infrastructural

²⁷ The concept of digital sovereignty lacks a single, universally accepted definition, leading different actors to use and interpret it in various ways. In a broad sense, digital sovereignty is defined as the ability of a state or region, in accordance with its laws, to influence the production of digital technologies (including the extraction and processing of necessary raw materials), their development, usage, and operational outcomes, as well as to restrict these processes. Taylor & Francis. (2024). *Digital sovereignty – Rhetoric and reality*. Accessed on May 13, 2026, <https://www.tandfonline.com/doi/full/10.1080/13501763.2024.2358984#abstract>.

²⁸ Oxford University Press. (2023). *Digital Empires: The Global Battle to Regulate Technology*. Accessed on May 13, 2026. <https://global.oup.com/academic/product/digital-empires-9780197649268?cc=kg&lang=en&>

²⁹ OxJournal. (2025, September). *Digital Sovereignty and the Political Economy of Technology: A Comparative Study of U.S. and China Perspectives*. Accessed on May 13, 2026, <https://www.oxjournal.org/digital-sovereignty-and-the-political-economy-of-technology/>.

³⁰ Horowitz M. A. (2024, May). *A Balancing Act: EU Media Regulation, Co-Regulation and Self-Regulation in the Digital Age*. Accessed on May 14, 2026, <https://journalismresearch.org/2024/05/a-balancing-act-eu-media-regulation-co-regulation-and-self-regulation-in-the-digital-age/>.

and market aspects of communications, while interference with information content has remained strictly limited due to the constitutional protection of free speech.³¹ Section 230 of the Communications Decency Act (CDA) remains the pivotal regulatory element governing online platform content in the United States.³²

It grants platforms broad latitude in defining their moderation policies, allowing corporations to independently determine which content to remove and which to retain. Furthermore, Section 230 immunizes platforms from liability regarding user-generated content, meaning that a platform cannot be held directly liable under civil law for third-party publications.

In 2023, the Biden Administration urged Congress to pass legislation aimed at curbing the influence of major technology companies (Apple, Google, Amazon, Meta) and strengthening antitrust policy within the digital sector. In his State of the Union address, Biden publicly advocated for the enactment of bipartisan antitrust legislation designed to reinforce antitrust oversight and prevent large platforms from gaining an unfair advantage over competitors.³³ As part of these efforts, the US Department of Justice proceeded with a major antitrust case against Google, which had been initiated on October 20, 2020.³⁴ The lawsuit alleges that Google unlawfully monopolized the internet search and search advertising markets, particularly on Android devices and through partnerships with Apple and mobile network operators. The judicial trial commenced in September 2023 in the US District Court for the District of Columbia.³⁵ As of early 2026, the litigation concerning the initial case is ongoing. Following the judge's ruling in September 2025 regarding the monopoly over the search market (wherein Google was not ordered to divest Chrome or Android, but was required to terminate its exclusive search contracts and share certain data with competitors³⁶) Moving forward, the parties face an appellate review process. The subsequent phases of the dispute include the consideration of appeals filed by both sides, and experts anticipate that the litigation could span several years.

In 2023, the Department of Justice also filed a second antitrust lawsuit against Google concerning the unlawful monopolization of the advertising technology (adtech)³⁷ market. In April 2025, a judge of the US District Court for the Eastern District of Virginia ruled³⁸ that Google had established an illegal monopoly in its advertising operations. Google issued a press release announcing that the company would appeal the

31 The immunity granted under Section 230 is limited regarding the obligation to remove copyright-infringing content, sexually explicit materials, and other content that violates federal criminal laws.

32 Section 230 is a provision of the Communications Act of 1934, enacted as part of the Communications Decency Act of 1996 (which constitutes Title V of the Telecommunications Act of 1996), and generally grants immunity to internet platforms regarding content created by their users. Enacted at a time when internet usage was just beginning to expand in both the variety of services and the number of users in the United States, Section 230 is frequently referred to as the crucial law that enabled the modern internet to flourish.

33 Bloomberg Law. (2023, February). *Biden Calls for Antitrust Measures to Rein in Power of Big Tech*. Accessed on May 14, 2026, <https://news.bloomberglaw.com/antitrust/biden-calls-for-antitrust-measures-to-rein-in-power-of-big-tech>.

34 U.S. Department of Justice. (2020, October). *Justice Department Sues Monopolist Google for Violating Antitrust Laws*. Accessed on May 14, 2026, <https://www.justice.gov/archives/opa/pr/justice-department-sues-monopolist-google-violating-antitrust-laws>.

35 Associated Press. (2024, August). *Google illegally maintains monopoly over internet search, judge rules*. Accessed on May 14, 2026, <https://apnews.com/article/google-antitrust-search-engine-verdict-apple-319a61f20fb11510097845a30abaefd8>.

36 BBC. (2025, September). *Google not required to sell Chrome or Android, judge rules in win for tech giant*. Accessed on May 14, 2026, <https://www.bbc.com/news/live/cg50dli9gm4t>.

37 The lawsuit accuses Google of unlawfully monopolizing the advertising technology (adtech) market in violation of Sections 1 and 2 of the Sherman Antitrust Act of 1890. This lawsuit is distinct from the first antitrust case initiated in 2020, which accuses Google of maintaining an unlawful monopoly in the search engine market. U.S. Department of Justice. (2023, January). *Justice Department Sues Google for Monopolizing Digital Advertising Technologies*. Accessed on May 14, 2026, <https://www.justice.gov/archives/opa/pr/justice-department-sues-google-monopolizing-digital-advertising-technologies>.

38 The New York Times. (2025, April). *Google Broke the Law to Keep Its Advertising Monopoly, a Judge Rules*. Accessed on May 14, 2026, <https://www.nytimes.com/2025/04/17/technology/google-ad-tech-antitrust-ruling.html>.

ruling.³⁹ As of early 2026, a separate final decision on this matter has not yet been rendered. Concurrently, regulatory efforts face constraints in other cases. For instance, in the antitrust litigation against Meta regarding the monopolization of social media networks⁴⁰, the court ruled in favor of the corporation in 2022, dismissing the threat of a divestiture of WhatsApp and Instagram.⁴¹

Beyond antitrust enforcement, the Biden administration explored the necessity of regulating algorithms and digital platforms, including the potential risks associated with automated services, discrimination, and the dissemination of harmful information. In 2022, the White House convened roundtables involving industry executives, regulators, and civil society representatives to deliberate on platform reform principles aimed at fostering competition, ensuring algorithmic transparency, and increasing platform accountability.⁴²

Consequently, driven by the expanding role of Big Tech as pivotal infrastructure actors structuring the distribution of online content that influences societal processes, regulatory attempts targeting tech conglomerates were similarly pursued within the United States. However, these initiatives were partially or fully rolled back following a shift in political direction under the Trump administration. In contrast to the Biden administration, which focused on intensifying antitrust policy and regulating digital platforms through the lens of market competition and algorithmic design, Trump emphasized criticism of international platform regulation initiatives, particularly those spearheaded by the European Union.

The Transformation of US Presidential Administration Rhetoric and the Strategic Adaptation of VLOPs

Following the events of January 6, 2021, responses within the Republican Party and among conservative politicians were heterogeneous. Alongside the condemnation of actions leading to the storming of the Capitol and criticism of Donald Trump,⁴³ a discourse concerning digital platform censorship and their role in suppressing conservative voices⁴⁴ gradually intensified, subsequently becoming more consolidated.⁴⁵ In the context of Donald Trump's return to the presidency, this discourse has incorporated the argument that content restrictions and moderation practices implemented by digital platforms may be linked to external regulatory frameworks, particularly those originating from the European Union. This critical rhetoric was formally reflect-

39 Associated Press. (2025, April). *Google's Digital Ad Network Declared an Illegal Monopoly, Joining Its Search Engine in Penalty Box*. Accessed on May 14, 2026, <https://apnews.com/article/google-illegal-monopoly-advertising-search-a1e4446c4870903ed05c03a2a03b581e>.

40 The plaintiff, the U.S. Federal Trade Commission (FTC), sought to force the \$1.5 trillion company to divest its acquisitions of the WhatsApp messaging service and the Instagram photo-sharing application.

41 Financial Times. (2025, November). *Meta Wins US Case That Threatened Split With WhatsApp and Instagram*. The plaintiff, the U.S. Federal Trade Commission (FTC), sought to force the \$1.5 trillion company to divest its acquisitions of the WhatsApp messaging service and the Instagram photo-sharing application, https://www.ft.com/content/f3206cf5-82d3-4b38-9999-907448b5a6d0?utm_source=chatgpt.com&syn-25a6b1a6=1.

42 Reuters. (2022, September). *White House Unveils Principles for Big Tech Reform*. Accessed on May 18, 2026, <https://www.reuters.com/technology/white-house-holding-roundtable-big-tech-concerns-2022-09-08/>.

43 Schneider E. (2021, July). *Cheney, Kinzinger Take Center Stage at Jan. 6 Hearing as GOP Leaders Distance Themselves* // Politico. Accessed on May 18, 2026, <https://www.politico.com/news/2021/07/27/kinzinger-cheney-republican-leaders-jan-6-hearing-500847>.

44 Breuninger K. (2021, May). *Republicans Ramp Up Threats to Big Tech After Trump Facebook Ban Upheld* // CNBC. Accessed on May 18, 2026. <https://www.cnbc.com/2021/05/05/republicans-ramp-up-threats-to-big-tech-after-trump-facebook-ban-upheld.html>.

45 Lambert T. A., Cooper J. C. (2026, April). *Fake News: Why the FTC's Campaign Against «Big Tech Censorship» is Wrong on the Facts and the Law* // U.C. Law Journal, 2027 (forthcoming). University of Missouri School of Law Legal Studies Research Paper No. 2026-36; George Mason Legal Studies Research Paper No. LS Forthcoming. Accessed on May 18, 2026, <https://ssrn.com/abstract=6570778> или <http://dx.doi.org/10.2139/ssrn.6570778>.

ed in a February 2026 report issued by the US House Committee on the Judiciary, which was under Republican control during the period in question. The report alleges⁴⁶ that the European Commission exerted pressure on major social media platforms to alter their global content moderation policies, which in turn directly impinged upon the freedom of expression of American users online within the territory of the United States.⁴⁷

This discourse demonstrates a notable transformation. During the first administration of Donald Trump, a segment of Republican politicians had initiated discussions on reforming Section 230 to restrict the legal immunity of digital platforms, accusing them of political bias against conservative viewpoints.⁴⁸ In 2020, President Donald Trump signed an executive order aimed at strengthening regulatory oversight of online platforms and reviewing their statutory protections under Section 230, a move motivated by allegations of politically biased content moderation.⁴⁹ These accusations subsequently evolved into a broader political narrative regarding “Big Tech censorship,” which accelerated significantly after Donald Trump’s accounts were suspended following the Capitol storming on January 6, 2021,⁵⁰ and during the ensuing debates over the role of platforms in socio-political processes.⁵¹

Trump himself, although during his first term criticizing Section 230 for enabling platforms to “censor protected speech,” has since 2022 owned his own platform, Truth Social, which relies on the protections of Section 230 to host and moderate third-party content. Following its launch, he has virtually abstained from commenting on potential legislative reforms to the statute.⁵² Furthermore, as Donald Trump’s previously adversarial relations with VLOPs gradually stabilized — including the reinstatement of his suspended accounts — a re-orientation has occurred within his rhetoric: criticism targeting the platforms themselves has been supplanted by an emphasis on the European Union’s regulatory initiatives⁵³ concerning digital platforms, including measures enacted since 2020.⁵⁴ This refers specifically to the adopted Digital Services Act (DSA), as well as

46 U.S. House Judiciary Committee. (2026, February). *The Foreign Censorship Threat, Part II: Europe’s Decade-Long Campaign to Censor the Global Internet and How It Harms American Speech in the United States*. Accessed on May 18, 2026, <https://judiciary.house.gov/sites/evo-subsites/republicans-judiciary.house.gov/files/2026-02/THE-FOREIGN-CENSORSHIP-THREAT-PART-II-2-3-26.pdf>.

47 In response, a number of digital law scholars point out that such interpretations of European regulation, specifically the Digital Services Act (DSA), distort its legal nature. In their view, the DSA does not grant the European Commission the authority to censor lawful content and should be applied as a content-agnostic regime aimed primarily at ensuring users’ procedural rights and countering illegal content. Furthermore, key provisions of the Act, including the risk-based approach (Articles 34–35), do not permit the direct regulation of specific political speech, and any risk mitigation measures must remain content-neutral. U.S. Academic Letter. (2025). Hearing on «*Europe’s Threat to American Speech and Innovation*». Accessed on May 21, 2026, <https://husovec.eu/wp-content/uploads/2025/09/US-Academic-Letter-DSA-Censorship.pdf>.

48 Josh Hawley. (2019, June). *Senator Hawley Introduces Legislation to Amend Section 230 Immunity for Big Tech Companies*. Accessed on May 18, 2026, <https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-230-immunity-big-tech-companies/>.

49 Wilson Sonsini. (2020, June). *Executive Order Directed to Section 230 to Increase Regulatory Scrutiny of Online Services*. Accessed on May 18, 2026, <https://www.wsgr.com/en/insights/executive-order-directed-to-section-230-to-increase-regulatory-scrutiny-of-online-services.html>.

50 BBC. (2021, February). *Capitol Riots: Did Trump’s Words at Rally Incite Violence?*. Accessed on May 18, 2026, <https://www.bbc.com/news/world-us-canada-55640437>.

51 Monnet, S. (2024, April). «*Deplatforming*» Donald Trump was a necessary quick fix. What now? // Diplo (DiploFoundation). Accessed on May 18, 2026, <https://www.diplomacy.edu/blog/deplatforming-donald-trump-was-necessary-quick-fix-what-now/>.

52 Columbia Journalism Review. (2024, December). *Whither Section 230 Under Trump 2.0?* Accessed on May 18, 2026, https://www.cjr.org/the_media_today/section_230_trump.php.

53 Tauber A. (2026, February). *US Republicans Accuse the EU of ‘Decade-Long Censorship Campaign’* // EUobserver. Accessed on May 11, 2026, <https://euobserver.com/201378/us-republicans-accuse-the-eu-of-decade-long-censorship-campaign/>.

54 EEuropean authorities insist that their regulatory approach is based on the equal and fair application of their rules to all companies operating within the EU. CNN. (2026, January). *Trump administration’s vision of US tech dominance is colliding with Europe*. Accessed on May 21, 2026, <https://edition.cnn.com/2026/01/12/tech/us-eu-tech-regulation-fight-explained>. A defining feature of these regulations is their extraterritorial effect. They apply not only to EU-based companies but also to foreign companies that process the data of EU citizens.

the self-regulatory codes that operated prior to its entry into force and were subsequently integrated into the DSA framework:⁵⁵ the Code of Conduct on Countering Illegal Hate Speech Online (2016)⁵⁶ and the Code of Practice on Disinformation, originally signed in 2018 and substantially strengthened in 2022.⁵⁷

Additionally, with the commencement of Donald Trump's second term, a strategic adaptation of VLOPs to the new political environment has been observed. For instance, in January 2025, following Trump's victory in the US presidential election, Meta CEO Mark Zuckerberg announced the termination of the company's long-term independent fact-checking program on Facebook and Instagram within the United States,⁵⁸ a move that drew condemnation from international fact-checking organizations.⁵⁹ This relaxation of Meta's content moderation policies can be viewed as the corporation adapting to Trump's criticism regarding the alleged censorship of conservative content; it is further corroborated by Zuckerberg publicly praising the President and engaging in regular meetings with him.⁶⁰ In place of external fact-checking, Meta implemented a system of so-called "community notes," analogous to the mechanism utilized on platform X (formerly Twitter), where contextual notes regarding the accuracy of posts are generated and rated by the users themselves — a framework that has long faced criticism from disinformation experts.⁶¹

In 2025, several VLOPs opted to settle out of court the lawsuits filed by Donald Trump following the suspension of his accounts in January 2021 (in the wake of the January 6 Capitol storming), despite the fact that the First Amendment to the US Constitution virtually guaranteed the platforms a judicial victory.⁶² Specifically, Meta agreed to pay Donald Trump approximately \$25 million,⁶³ platform X settled for around \$10 mil-

55 These codes were endorsed and signed by the major Very Large Online Platforms (VLOPs) at various stages. The Code of Conduct on Countering Illegal Hate Speech Online was initially signed in 2016 by Google, YouTube, Facebook, Twitter, and Microsoft; between 2018 and 2019, Instagram, Google+, Dailymotion, Snap, and Jeuxvideo.com also joined, securing a coverage of approximately 96% of the EU online platform market. The Code of Practice on Disinformation was initially signed in 2018 by a number of major platforms, including key VLOPs such as Google, YouTube, Facebook, Twitter, and Microsoft; in 2022, the code was significantly strengthened, and additional platforms and stakeholders joined the revision process, expanding both the reach and the accountability of the signatories. European Commission. (2025, January). *Commission welcomes the integration of the revised Code of conduct on countering illegal hate speech online into the Digital Services Act*. Accessed on May 11, 2026, <https://digital-strategy.ec.europa.eu/en/news/commission-welcomes-integration-revised-code-conduct-countering-illegal-hate-speech-online-digital>; European Commission. *The 2022 Code of Practice on Disinformation*. Accessed on May 20, 2026, <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>.

56 European Commission. *The EU Code of conduct on countering illegal hate speech online*. Accessed on May 11, 2026, https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combating-discrimination/racism-and-xenophobia/eu-code-conduct-countering-illegal-hate-speech-online_en.

57 European Commission. (2022, June). *Signatories of the 2022 Strengthened Code of Practice on Disinformation*. Accessed on May 20, 2026, <https://digital-strategy.ec.europa.eu/en/library/signatories-2022-strengthened-code-practice-disinformation>.

58 NBC News. *Meta is ending its fact-checking program in favor of a 'community notes' system similar to X's*. Accessed on May 20, 2026, <https://www.nbcnews.com/tech/social-media/meta-ends-fact-checking-program-community-notes-x-rcna186468>.

59 Reuters Institute. (2025, January). *Amid war, vicious attacks and political turmoil, global fact-checkers fear the impact of the end of Meta's programme*. Accessed on May 20, 2026, <https://reutersinstitute.politics.ox.ac.uk/news/amid-war-vicious-attacks-and-political-turmoil-global-fact-checkers-fear-impact-end-metas>.

60 NPR. (2024, November). *Zuckerberg dines with Trump in Mar-a-Lago*. Accessed on May 20, 2026, <https://www.npr.org/2024/11/28/g-s1-36123/zuckerberg-dines-with-trump-in-mar-a-lago>.

61 Center for Countering Digital Hate. (2024, November). *Rated not helpful: How X's Community Notes system falls short on misleading election claims*. Accessed on May 11, 2026, <https://countershate.com/research/rated-not-helpful-x-community-notes/>; Poynter. (2023, June). *Why Community Notes mostly fails to combat misinformation*. Accessed on May 20, 2026, <https://www.poynter.org/fact-checking/2023/why-twitters-community-notes-feature-mostly-fails-to-combat-misinformation>.

62 The First Amendment to the U.S. Constitution protects citizens from government interference, rather than interference by private companies; therefore, this aspect could serve as a powerful argument for the defense in a lawsuit.

63 NPR. (2025, January). *Meta agrees to pay Trump \$25 million to settle lawsuit over Facebook and Instagram suspensions*. Accessed on May 20, 2026, <https://www.npr.org/2025/01/29/nx-s1-5279570/meta-trump-settlement-facebook-instagram-suspensions>.

lion,⁶⁴ and YouTube agreed to a settlement of roughly \$24.5 million.⁶⁵ An additional indicator of the state's intensifying role in its relations with the technology sector was the situation surrounding TikTok. As part of the restructuring deal for the US segment of the ByteDance-owned platform, the US administration effectively acted as an active participant in negotiations and, according to media reports, secured a payment of up to \$10 billion to the state from investors.⁶⁶ In this instance, the action represents expanded state intervention in private corporate transactions rather than traditional regulation, with the government acting not merely as an overseer but as a *de facto* participant in the process. This, in turn, demonstrates an asymmetry in the US administration's positioning: while publicly criticizing regulatory measures in the EU, it simultaneously intervenes directly in domestic private corporate deals. Such agreements may indicate a desire among VLOPs to avert conflict with the sitting US administration to mitigate political and regulatory risks, which fundamentally raises questions not only about the independence of their moderation policies and recommendation algorithms but also about the strategic dimensions of their operations as a whole.

The European Digital Services Act

Against this backdrop, the European approach is distinguished by its commitment to establishing a comprehensive institutional and legal framework governing the operations of digital platforms. The General Data Protection Regulation (GDPR), the Digital Services Act (DSA), and the Digital Markets Act (DMA) have emerged as global benchmarks for balancing public interests with economic dynamism.⁶⁷ The Digital Services Act, which fully entered into force in 2024, represents a massive, systemic initiative to regulate digital platforms, explicitly recognizing their critical role in the functioning of the contemporary public sphere. Under the DSA framework, stringent obligations are imposed on the largest online platforms — designated as VLOPs — which command an audience exceeding 45 million monthly active users within the European Union (such as Facebook, TikTok, YouTube, and others).

The DSA aims to foster a safer, more predictable, and trustworthy digital environment. Its preamble emphasizes that the responsible behavior of intermediary service providers is a foundational prerequisite for an online ecosystem where EU citizens can fully exercise their fundamental rights as enshrined in the Charter of Fundamental Rights of the European Union. These rights include freedom of expression and information, freedom to conduct a business, the right to non-discrimination, and a high level of consumer protection.⁶⁸

In alignment with these principles, the DSA mandates that platforms actively mitigate systemic risks, such as the dissemination of illegal and harmful content. It places significant emphasis on transparency regarding content moderation, legally binding platforms to provide clear statements of reasons to users whenever their content is removed or restricted. Furthermore, users are granted robust rights to contest these moderation decisions through internal complaint-handling systems as well as certified out-of-court dispute settlement

64 The New York Times. (2025, February). *Elon Musk's X Settles Trump Lawsuit*. Accessed on May 20, 2026, <https://www.nytimes.com/2025/02/12/technology/musk-x-settles-trump-lawsuit.html>.

65 CBS News. (2025, September). *YouTube to pay \$22 million for White House ballroom to settle lawsuit from Trump*. Accessed on May 20, 2026, <https://www.cbsnews.com/news/youtube-settles-trump-lawsuit-white-house-ballroom/>.

66 The New York Times. (2026, March). *TikTok Investors Set to Pay \$10 Billion Fee to Trump Administration*. Accessed on May 20, 2026, https://www.nytimes.com/2026/03/13/business/trump-tiktok-10-billion-fee.html?nl=breaking-news&segment_id=216644.

67 OECD. *Productivity and business dynamism*. Accessed on May 21, 2026, <https://www.oecd.org/en/topics/productivity-and-business-dynamism.html>.

68 European Commission. (2026, May). *Supervision of the designated very large online platforms and search engines under DSA*. Accessed on May 21, 2026, <https://digital-strategy.ec.europa.eu/en/policies/list-designated-vlops-and-vloses>.

mechanisms. Enforcement oversight is dual-layered, executed jointly by the European Commission and national Digital Services Coordinators (DSCs) appointed within each Member State.

Despite the widespread adherence of platforms to the Code of Practice on Disinformation and its integration into the framework of the Digital Services Act, in practice, there is a significant gap between formal signatory status and the actual fulfillment of commitments. A number of platforms continue to position themselves as participants in the Code while simultaneously scaling back or completely terminating their performance of core obligations. According to data from the European Fact-Checking Standards Network (hereinafter referred to as EFCSN), an expert network monitoring fact-checking standards and Code compliance in the EU, despite Google's previously promising collaboration with fact-checkers, the company has abandoned the section on engagement with the fact-checking community, a move mirrored by YouTube. YouTube has made no effort to integrate fact-checking into its platforms, and Google has also removed its highly successful fact-checking markup, ClaimReview.⁶⁹ TikTok maintains a fact-checking program and remains a signatory to the relevant chapter of the Code; however, its January 2025 subscription document contained a footnote conditioning its obligations upon the participation of other platforms. Meta's third-party fact-checking program is in many ways one of the best in its class, yet the EFCSN is seriously concerned about its future following the early 2025 announcement of its termination in the US and the transition to the Community Notes model, which is already showing signs of the same problems observed on X (formerly Twitter).

Within academic literature, there is a distinct lack of consensus regarding the consequences of digital platform regulation. A number of authors point to potential structural effects linked to the concentration of power and escalating regulatory compliance costs. Cory Doctorow, an expert in digital policy and technology regulation, argues that certain forms of digital platform regulation can inadvertently reinforce the market power of dominant tech conglomerates. In his view, this occurs not because of regulation itself, but because compliance with complex mandates — particularly in areas like content moderation and regulatory oversight — demands substantial resources and sophisticated technological infrastructure. These assets are predominantly accessible only to dominant market incumbents. Consequently, such statutory measures can raise barriers to entry and suppress market competition. As an alternative, he advocates for the development of interoperability, which would allow third-party services to interface with major platforms, thereby eroding monopolistic power by expanding competitive opportunities and fostering alternative services.⁷⁰ A similar challenge regarding the centralization of power over digital speech is raised by Daphne Keller, a legal scholar and digital platform regulation researcher. She notes that the primary models of online content governance — whether executed through platform self-regulation or state-mandated frameworks — tend to intensify the concentration of control over opinion expression. Her analysis emphasizes that neither delegating total moderation authority to corporate platforms nor establishing a state-enforced regulatory system offers an optimal solution, as both approaches structurally reinforce centralized control over public speech. Instead, Keller views models centered on expanding user choice as a more favorable alternative. This includes “middleware” solutions, which empower users to independently choose their own filtering and content consumption rules via competing third-party moderation services that could potentially integrate with dominant platforms through interoperability frameworks.⁷¹

69 European Fact-Checking Standards Network. (2025). *The moment of truth for the Code of Conduct on Disinformation*. Accessed on May 21, 2026, <https://efcsn.com/policy/report-released-the-moment-of-truth-for-the-code-of-conduct-on-disinformation/>.

70 The Economist. (2019, June). *Regulating Big Tech makes them stronger, so they need competition instead*. Accessed on May 21, 2026, https://www.economist.com/open-future/2019/06/06/regulating-big-tech-makes-them-stronger-so-they-need-competition-instead?fsrc=gp_en?fsrc=scn/tw/te/bl/ed/regulatingbigtechmakeshemstrongersotheyneedcompetitioninsteadopenvoices.

71 Keller D. (2022, June). *Lawful but Awful: Control over Legal Speech by Platforms, Governments, and Internet Users* // University of Chicago Law Review Online. Accessed on May 21, 2026, <https://lawreview.uchicago.edu/online-archive/lawful-awful-control-over-legal-speech-platforms-governments-and-internet-users>.

The European Media Freedom Act

While the DSA primarily aims to regulate platforms as digital communication infrastructure, a comprehensive analysis of the European regulatory architecture must also examine the European Media Freedom Act (hereinafter referred to as EMFA). This regulation introduces additional mechanisms designed to protect media and journalism as an independent institution. One of the pivotal provisions of this act is Article 18, which establishes specific safeguards to protect journalistic content, produced in accordance with professional standards, from unwarranted removal by online platforms.⁷² Under these provisions, VLOPs are legally mandated to notify media service providers in advance of their intention to remove or restrict their journalistic material and to provide a detailed statement of reasons. Furthermore, media service providers are granted a 24-hour window to respond before the content removal decision takes effect.

To benefit from these statutory guarantees, the law requires media service providers to verify their compliance with specific criteria through a dedicated declaration functionality, which platforms are obligated to integrate into their user interfaces under EMFA requirements. This functionality may be implemented in the form of a questionnaire that media service providers can complete and authenticate using an electronic signature or other verification methods to prevent automated bot submissions⁷³. Specifically, media service providers must declare their editorial independence, adherence to professional standards, and subjection to regulatory oversight or co-/self-regulatory mechanisms. They must also declare that their published content (including content generated using AI) undergoes editorial control. Additionally, media service providers must provide their legal and contact details, alongside the contact information of relevant regulatory bodies or self-regulatory structures, thereby enabling VLOPs to verify the declared status⁷⁴.

VLOPs, in turn, are required to acknowledge receipt of these declarations and provide their contact details through which media service providers can engage with them directly and expeditiously. Decisions to accept, reject, or revoke declarations must be based solely on compliance with the criteria set forth in Article 18(1), rather than on adherence to the VLOPs' own terms and conditions. All of these measures are aimed at institutionalizing the boundaries of the platforms' algorithmic power, as well as recognizing the distinct role of professional journalism within the digital information ecosystem.

At the same time, the provisions of Article 18 have sparked lively debates within the professional and expert communities. Some researchers and media sector representatives, including fact-checking organizations, express concern that granting a special status to media entities could potentially facilitate the dissemination of disinformation or be exploited for covert information operations, without providing a sufficient increase in transparency.⁷⁵ Others question the very concept of the so-called "media privilege" and criticize the definition of "media service providers" used in the EMFA, arguing that it is too narrow because it excludes various

⁷² European Commission. (2022, June). *Guidelines under Article 18 of the European Media Freedom Act (EMFA)*. Accessed on May 21, 2026, <https://digital-strategy.ec.europa.eu/en/library/guidelines-under-article-18-european-media-freedom-act-emfa>.

⁷³ Global Policy Watch. (2026, February). *European Commission Issues Guidelines on Article 18 of the European Media Freedom Act*. Accessed on May 21, 2026, <https://www.globalpolicywatch.com/2026/02/european-commission-issues-guidelines-on-article-18-of-the-european-media-freedom-act/>.

⁷⁴ Official Journal of the European Union. (2024, April). *Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act), Article 18*. Accessed on May 22, 2026, https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202401083.

⁷⁵ Cesarini P., De Gregorio G., Pollicino O. (2023). *The Media Privilege in the European Media Freedom Act* // MediaLaws. Accessed on May 22, 2026, https://www.medialaws.eu/wp-content/uploads/2023/09/EMFA_Rev-1.pdf.

alternative forms of journalistic activity from the scope of protection.⁷⁶

It should be noted that the consolidation of the EU regulatory architecture regarding digital platforms is accompanied by active resistance from the platform companies themselves, which leverage their financial and institutional resources to influence the regulatory agenda and mitigate potential restrictions. For instance, according to an Amnesty International report, in 2024 alone, Meta reported lobbying expenditures exceeding \$24 million⁷⁷. Furthermore, according to the LobbyFacts website — which aggregates data from the European Union Transparency Register, European Parliament records on accredited badge holders, and European Commission records on high-level meetings with lobbyists — Meta spented between €725,000 and €1.5 million on lobbying activities conducted through consulting firms and legal practitioners in 2024, in addition to its own direct lobbying expenditures.

Despite facing criticism, European platform regulation initiatives can be viewed as an attempt to establish institutional boundaries around the dominant power of platforms and to safeguard public-interest journalism within an algorithmically driven information environment. In a broader context, this represents an effort to restore the regulation of digital information and communication infrastructure to the domain of law and democratic accountability.

In states where independent media encounter political pressure, economic constraints, and a contraction of traditional distribution channels, dependency upon global digital platforms becomes exceptionally pronounced. Under these conditions, algorithmic decisions and opaque content moderation practices can exert a substantial influence on the visibility of public-interest journalistic content, audience accessibility, the sustainability of media organizations, and the overall safety of journalists.⁷⁸

It is precisely within this context that analyzing how independent media interact with digital platforms becomes increasingly critical, alongside examining how these organizations perceive their own dependence on an algorithmically governed platform infrastructure responsible for the distribution and visibility of information.

⁷⁶ European University Institute. (2025). *The media privilege is finally unfolding: now what? Discussing the implementation of Article 18 of the European Media Freedom Act*. Accessed on May 22, 2026, <https://www.eui.eu/events?id=577436>.

⁷⁷ Amnesty International. (2025). *BREAKING UP WITH BIG TECH: A Human Rights-Based Argument for Tackling Big Tech's Market Power*. Accessed on May 22, 2026, https://www.amnesty.fr/wp-content/uploads/2025/10/aL_-MmGNHVfTO09WRapport_Breaking_Up_With_Big_Tech.pdf#:~:text=Social%20media%20platforms%20shape%20what,next%20frontier%20of%20technological%20development.

⁷⁸ Organization for Security and Co-operation in Europe. (2025). *Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*. Vienna: OSCE. Accessed on May 22, 2026, https://rfom.osce.org/sites/default/files/f/documents/e/3/598525_1.pdf.

The Context of Kyrgyzstan

International organizations report a deterioration of operational conditions for independent media, including an escalation of legal and institutional risks associated with expressing critical viewpoints regarding the authorities, despite statutory guarantees for freedom of thought, opinion, and the dissemination of information under the Constitution of the Kyrgyz Republic.⁷⁹ In 2026, Kyrgyzstan was ranked 146th in the World Press Freedom Index compiled by Reporters Without Borders (RSF), placing the country within the category of nations characterized by a “very serious situation” concerning media freedom.⁸⁰

Kyrgyzstan's Position in the World Press Freedom Index (RSF)

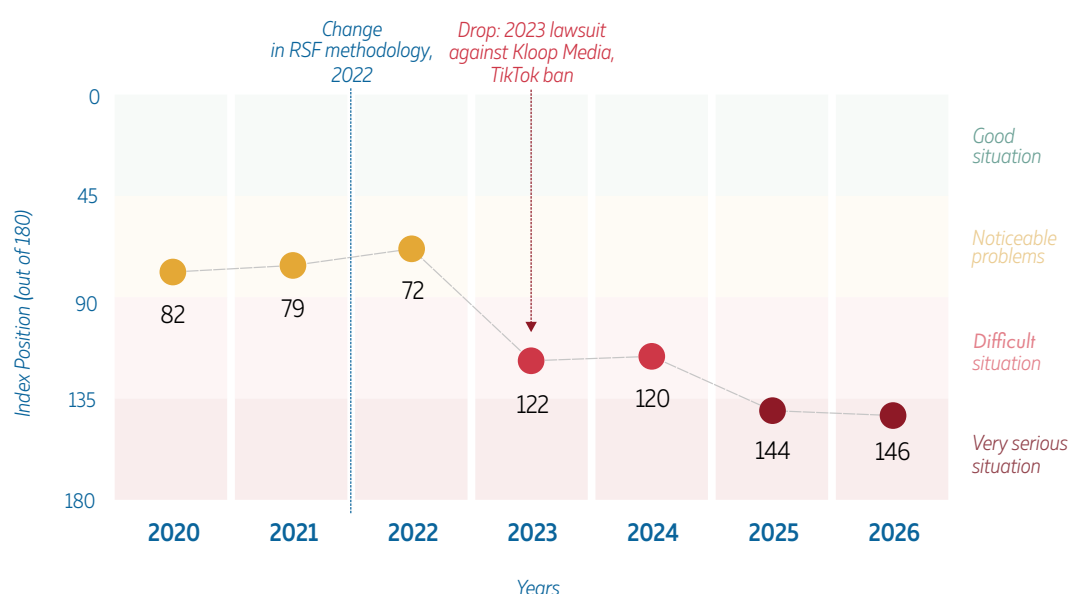


Figure 2. Dynamics of Kyrgyzstan's ranking in the World Press Freedom Index (RSF) from 2020 to 2026. In 2022, RSF modified its index calculation methodology.

Source: RSF World Press Freedom Index, 2020-2026.

This position in the rankings reflects a broader trend of intensifying pressure on journalists, activists, and social media users, driven in part by the sequential expansion and institutionalization of legislative constraints, where new restrictive measures are continually superimposed upon the existing regulatory framework. Consequently, a complex regulatory ecosystem is emerging, within which diverse legal instruments can be deployed simultaneously. Thus, in 2025, liability for defamation and insult was reintroduced. The enacted Law “On Amendments to the Code of the Kyrgyz Republic on Offenses” establishes liability for defamation and insult, explicitly encompassing publications in the media and on the internet, with fines stipulated at 20,000

⁷⁹ The Constitution of the Kyrgyz Republic. (Adopted by referendum (popular vote) on April 11, 2021). Accessed on May 22, 2026, <https://cbd.minjust.gov.kg/1-2/edition/1202952/ru>.

⁸⁰ Reporters Without Borders. *RSF World Press Freedom Index*. Accessed on May 22, 2026, <https://rsf.org/en/index>.

KGS for individuals and 65,000 KGS for legal entities.⁸¹ Crucially, the statute empowers law enforcement agencies (bodies of internal affairs) to initiate investigations without the consent of the aggrieved party — meaning an investigation can proceed even if no formal complaint has been filed. This creates substantial risks for individuals expressing critical viewpoints, particularly regarding public figures.

Additionally, a law prescribing liability for the dissemination of inaccurate (false) information entered into force, mirroring the fine structures of 20,000 KGS for individuals and 65,000 KGS for legal entities.⁸² However, the legislation fails to specify the precise nature of the inaccurate information that triggers liability, leaving it ambiguous whether it applies strictly to statements regarding specific individuals or to factual circumstances in general. This regulatory framework similarly provides authorized state bodies with the prerogative to intervene without the petition or explicit consent of the presumed injured party.

Beyond the introduction of new legislative constraints, trends restricting freedom of speech and media freedom are similarly manifest in law enforcement practices, particularly in the cases involving the Kloop Media Public Foundation (PF), which include the blocking of its website and the initiation of corporate liquidation proceedings. Utilizing the 2021 Law “On Protection from Inaccurate (False) Information”⁸³ — enacted in violation of the Constitution of the Kyrgyz Republic and granting the executive branch (the Ministry of Culture of the Kyrgyz Republic) broad powers to block internet resources without prior judicial review⁸⁴ — the Ministry of Culture issued a decision to block the website www.kloop.kg in 2023. This action was taken after the editorial board of PF “Kloop Media” refused to comply with the Ministry’s demand to remove an article titled “Politician Ravshan Dzheenbekov stated that he is being tortured in SIZO-1,” on the grounds that the material was based on a public statement published by a public figure on his personal Facebook page.⁸⁵ Although the court of first instance initially ruled the block unlawful, on June 3, 2024, the Bishkek City Court overturned this decision and dismissed the lawsuit, effectively validating the legality of the Ministry of Culture’s actions regarding the website ban.⁸⁶ Concurrently, in 2023, the prosecutor’s office initiated a lawsuit seeking the liquidation of PF “Kloop Media.” Despite the organization’s attempts to appeal the judicial decisions, the litigation was marked by significant procedural impediments, including the rejection of the appellate complaint on formalistic grounds, the denial of motions to reinstate missed filing deadlines, and the restriction of opportunities to have the appeals reviewed on their merits.⁸⁷ Following the formal liquidation of PF “Kloop Media,” further judicial appeals against the website blocking decision were discontinued.

81 Law of the Kyrgyz Republic “On Amendments to the Code of the Kyrgyz Republic on Offenses” dated January 27, 2025, No. 30. Accessed on May 22, 2026., <https://cbd.minjust.gov.kg/4-5478/edition/25920/ru>

82 Toktom. (2025). *Liability Introduced for the Dissemination of Inaccurate (False) Information*. Accessed on May 22, 2026, <https://online.toktom.kg/NewsTopic/7398>.

83 Media Policy Institute. (2021, June). *Analysis of the Draft Law of the Kyrgyz Republic “On Protection Against False and Inaccurate Information”*. Accessed on May 22, 2026, <https://media.kg/wp-content/uploads/2021/06/analiz-k-proektu-zakona-kr-o-zashhite-ot-lozhnoj-i-nedostovernoj-informaczii-analiz.pdf>.
Media Policy Institute. (2021, June). *ΠReconsideration of the Rejected Bill «On Protection Against False and Inaccurate Information» (“On Manipulation of Information”) is Possible No Earlier Than January 2022*. Accessed on May 22, 2026, <https://www.media.kg/wp-content/uploads/2021/07/povtorno-rassmotrenie-otklonnogo-zakonoproekta-o-zashhite-ot-lozhnoj-i-nedostovernoj-informaczii-o-manipulirovanii-informaczii-vozmozhno-ne-ranee-yanvarya-2022-goda.pdf>.

84 Law of the Kyrgyz Republic “On Protection Against Inaccurate (False) Information” dated August 23, 2021, No. 101. Accessed on May 22, 2026, <https://cbd.minjust.gov.kg/112282/edition/1083610/ru>.

85 24.kg. (2024, March). *Blocking of the “Kloop” Website: The Court Ruled the Ministry of Culture’s Decisions Invalid*. Accessed on May 22, 2026, https://24.kg/obschestvo/289325_blokirovka_sayta_kloop_sud_priznal_resheniya_minkulta_nedeystvitelnyimi/.

86 Kaktus.media. (2024, June). *City Court Rules the Decision to Block Kloop.kg Lawful*. Accessed on May 22, 2026, https://kaktus.media/doc/502638_gorsyd_poschital_reshenie_o_blokirovke_kloop_kg_zakonnym.html.

87 Media Policy Institute. (2025). *Lawsuits in 2024 Involving the “Media Policy Institute” Public Foundation*. Paragraph 26. Accessed on May 22, 2026, <https://media.kg/wp-content/uploads/2025/10/26-marta-25g-tablicza-sudebnyh-del-2024-g.pdf>.

On January 17, 2024, within the framework of a criminal case initiated under Part 3 of Article 278 of the Criminal Code of the Kyrgyz Republic, the simultaneous detentions of 11 journalists from the editorial boards of “Temirov Live”, “PolitKlinika”, and “Archa Media” occurred, marking one of the most extensive instances of media prosecution in recent years. Officially, a law enforcement press release stated that the basis for the criminal prosecution was a specific video material published on YouTube, which, according to the findings of state-appointed experts, contained “signs of discrediting the current leadership of the country, as well as calls for protest actions and mass riots.”⁸⁸ On October 10, 2024, by a decision of the Lenin District Court of Bishkek, four journalists were found guilty and sentenced to various terms of imprisonment: Mahabat Tazhibek kyzy was sentenced to six years of imprisonment; journalist and akyn-improviser (traditional improvisational poet) Azamat Ishenbekov was sentenced to five years of imprisonment; while journalists Ayke Beyshekeeva and Aktilek Kaparov were each sentenced to five years of imprisonment with a three-year probation period (and subsequently released in the courtroom). The remaining journalists were acquitted due to the absence of the elements of a crime in their actions.⁸⁹ Subsequently, Azamat Ishenbekov was pardoned by a presidential decree.⁹⁰ In March 2026, the Supreme Court of the Kyrgyz Republic, acting upon a motion filed by Mahabat Tazhibek kyzy’s defense attorneys requesting a review of the criminal case based on newly discovered circumstances, remanded the case to the court of first instance for a retrial. On March 23, 2026, the court of first instance reopened the legal proceedings and commuted Mahabat Tazhibek kyzy’s preventive measure to a written pledge not to leave the jurisdiction (house arrest/travel restrictions).

In the subsequent years, the application of criminal-law and procedural measures against representatives of independent media persisted. For instance, in 2025, staff members of the “Kloop Media” editorial board were detained, interrogated without access to legal counsel, and accused of participating in publications critical of the authorities.⁹¹ Subsequently, some of the detained editorial staff were indicted under Article 278, Part 3 of the Criminal Code of the Kyrgyz Republic (“Calls for active disobedience to the lawful demands of representatives of the authorities and for mass riots”) in connection with five video materials published by Bolot Temirov on the “Temirov Live” YouTube channel. Crucially, the “Kloop Media” employees themselves stated that they had no involvement with the specified materials, while B. Temirov denied any association with the former “Kloop Media” staff, noting that he produces all content independently. Six months later, the judicial review of the “Kloop” employees accused of “inciting mass riots” concluded; following the appeals process, they were sentenced to three years of probation.⁹² In this context, in February 2026, independent journalists petitioned the country’s leadership, expressing grave concern over the practice of applying Article 278, Part 3 of the Criminal Code of the Kyrgyz Republic and other statutory provisions against journalists and activists. They called for a comprehensive review of specific criminal cases, an audit of the validity of existing sentences, the cessation of prosecutions in the absence of legal grounds, and the consideration of rehabilita-

88 Kaktus.media. (2024, January). *What Is Wrong with the Criminal Case Against Temirov Live Journalists? Lawyer’s Commentary?* Accessed on May 22, 2026, <https://kaktus.media/494034>.

89 Kaktus.media. (2024, October). *The Court Has Issued a Verdict on the 11 Journalists: What They Said (video)*. Accessed on May 22, 2026, <https://kaktus.media/510895>.

90 Kaktus.media. (2025, April). *ПThe President Pardoned Activist Zarina Torokulova and Journalist Azamat Ishenbek Uulu*. Accessed on May 22, 2026, <https://kaktus.media/521454>.

91 Amnesty International. (2025, May). *The Detention of Kloop Media Staff Signals Intensifying Repression of Independent Journalism in Kyrgyzstan*. Accessed on May 22, 2026, <https://www.amnesty.org/ru/latest/news/2025/05/zaderzhanie-sotrudnikov-kloop-media-svidetelstvuet-ob-usilenii-repressii-protiv-nezavisimoy-zhurnalistiki-v-kyrgyzstane/>; Current Time. (2025, November). *Bishkek City Court Commutes Sentence of Two Former Kloop Employees in “Calls for Mass Riots” Case, Handing Down Three-Year Probationary Terms*. Accessed on May 22, 2026, <https://www.currenttime.tv/a/kloop-duulatov-aleksandrov/33605156.html>.

92 Deutsche Welle. (2025). *In Kyrgyzstan, Independent Media Staff Members Sentenced to Five Years*. Accessed on May 22, 2026, <https://www.dw.com/ru/sotrudniki-nezavisimogo-smi-kloop-v-kyrgyzstane-polucili-po-pat-let-kolonii/a-74033851>.

tion and compensation measures in cases where violations of citizens' rights are identified.⁹³

In the same year, the "April TV" television channel was shut down by a court ruling following a lawsuit initiated by the prosecutor's office. The prosecution asserted that the editorial board's activities violated the requirements of mass media legislation and the provisions of Article 96, Part 2 of the Civil Code of the Kyrgyz Republic, which prescribe the possibility of liquidating a legal entity by court order in cases of repeated legal infractions or when an entity systematically engages in activities that contradict its chartered objectives. To substantiate the lawsuit, it was further argued that the television channel's content was one-sided and could contribute to the destabilization of the socio-political situation, leading authorities to deem it as undermining the state's authority.⁹⁴ Editor-in-Chief Dmitry Lozhnikov emphasized that criticizing the authorities does not constitute a crime and remains one of the core functions of the mass media, notwithstanding the forced closure of the outlet.⁹⁵

Pressure on independent media and freedom of expression is further demonstrated by the application of extrajudicial blocking mechanisms against VLOPs, as well as the creation of precedents where a civil court declares media materials and the activities of media executives to be extremist. Specifically, in September 2023, the State Committee for National Security of the Kyrgyz Republic (GKNB) ordered internet service providers to restrict access to TikTok, making the platform the first social network to be subjected to extrajudicial censorship.⁹⁶ Previously, the primary targets of blocking orders had been media websites. The blocking of TikTok was executed on the basis of an extrajudicial decision issued by a GKNB official, in compliance with Article 21-1, Paragraph 5 of the Law "On Communications" in force at that time. This statutory provision was subsequently integrated into the Digital Code of the Kyrgyz Republic (Articles 13 - 14).⁹⁷ In 2025, acting upon a lawsuit filed by the prosecutor's office, a court of first instance utilized special proceedings to declare the activities of Bolot Temirov and Rinat Tukhvatshin, along with the information materials of the online outlets "Temirov Live", "Kloop Media", and "Ayt Ayt Dese", as extremist.⁹⁸ By doing so, the court applied a criminal-law evaluation to the actions of citizens, which exceeds the competence of a civil court, given that civil procedural legislation does not provide for the possibility of designating the activities of individuals as extremist under special proceedings.⁹⁹ On March 9, 2026, the Supreme Court of the Kyrgyz Republic left the cassation appeal without consideration.¹⁰⁰ Consequently, the materials of these publications are banned from dissemination, including via publication, reposting, or quoting with direct links. Even a repost, a "like,"

⁹³ *Independent Journalists of the Kyrgyz Republic Issued a Statement Demanding a Review of Judicial Decisions in the Cases of Journalists and Activists Due to Recent Personnel and Structural Changes Within the Security Agencies.* Accessed on May 22, 2026, <https://media.kg/news/nezavisimye-zhurnalisty-kr-vystupili-s-zayavleniem-o-peresmotre-sudebnyh-reshenij-po-dela-zhurnalistov-i-aktivistov-v-svyazi-s-poslednimi-kadrovymi-i-strukturnymi-izmeneniyami-v-sisteme-organov-bezop/>.

⁹⁴ 24.kg. (2025, July). *Bishkek's Oktyabrsky District Court Issues Decision to Liquidate "April TV".* Accessed on May 22, 2026, https://24.kg/proisshestiya/335757_oktyabrskiy_rysud_bishkeka_vynes_reshenie_olikvidatsii_apreltv/.

⁹⁵ 24.kg. (2025, April). *Editor-in-Chief of "April": We Will Continue to Work and Prove That We Are Right in Court.* Accessed on May 22, 2026, <https://24.kg/obschestvo/327194/>.

⁹⁶ Eurasianet. (2025, August). *As ban hangs over TikTok in U.S., Kyrgyzstan's block isn't going as planned.* Accessed on May 22, 2026, <https://eurasianet.org/as-ban-hangs-over-tiktok-in-us-kyrgyzstans-block-isnt-going-as-planned>.

⁹⁷ Digital Code of the Kyrgyz Republic dated July 31, 2025, No. 178. Accessed on May 22, 2026, <https://cbd.minjust.gov.kg/3-48/edition/35412/ru?lang=ru>.

⁹⁸ 24.kg. (2025, October). *In Kyrgyzstan, Temirov Live and Kloop Media Designated as Extremist Organizations.* Accessed on May 22, 2026, https://24.kg/proisshestiya/348739_vkyrgyzstane_Temirov_Live_ikloop_media_priznanyi_ekstremistskimi/.

⁹⁹ 24.kg. (2025, October). *Lawyer Believes Grounds Exist to Overturn Ruling on Temirov Live and Kloop.* Accessed on May 22, 2026, https://24.kg/obschestvo/349255_advokat_schitaet_cho_est_osnovaniya_dlya_otmenyi_resheniya_poTemirov_Live_ikloop/.

¹⁰⁰ Kaktus.media. (2026, March). *The Supreme Court of the Kyrgyz Republic Reviewed the Appeal of the Kloop Media Outlet Against Extremism Charges.* Accessed on May 22, 2026, https://kaktus.media/doc/542029_verhovnyy_syd_kr_rassmotrel_apelliaciu_izdaniya_kloop_po_obvineniyu_v_ekstremizme.html.

or a hyperlink to the original source can be legally construed as dissemination if access to the material is maintained, which significantly amplifies the effect of self-censorship.

Consequently, independent media in Kyrgyzstan function within a state of dual dependency:

- On the algorithmic infrastructure of global platforms;
- On the national legal and law enforcement environment, which is characterized by the expansion of state control mechanisms.

The compounding impact of these dependencies negatively affects the financial sustainability of independent outlets. On one hand, if global platform algorithms restrict content visibility, or if media organizations are forced to curtail coverage of specific topics due to regulatory pressure, their readership and viewership decline. This, in turn, directly compromises advertising contracts and partnerships that are fundamentally contingent upon audience reach and engagement metrics. On the other hand, independent media faced significant financial losses in 2023: while no formal ban on advertising placements was enacted by state authorities, administrative methods were deployed to restrict independent outlets from accessing the advertising budgets of the largest state-owned enterprises.¹⁰¹ Furthermore, shifts in the advertising market were driven by non-political factors: in recent years, advertisers have increasingly bypassed traditional outlets to work directly with platforms and digital influencers. As a result, independent media are losing critical advertising revenues and remain heavily reliant on grants.¹⁰² However, access to grant funding is also contracting following the 2024 amendments to the Law on Non-Commercial Organizations (the “Foreign Representatives” Law). According to expert assessments, this framework threatens to diminish funding for civil society and independent media,¹⁰³ a trend compounded by the termination of grant programs by American development donors in 2025.¹⁰⁴ Finally, profound structural pressure is generated by the risk of asset forfeiture, specifically the freezing of independent media bank accounts¹⁰⁵ as a provisional measure in judicial proceedings, which severely undermines the economic viability of editorial operations.

At the intersection of these levels emerges the central research question: how do editorial boards perceive their digital dependency, what strategies do they formulate in response to algorithmic pressures, and is the development of institutional agency possible under conditions of such profound structural vulnerability?

¹⁰¹ 24.kg. (2023, August). *Sadyr Japarov Explains Why Certain Media Outlets Criticize Him*. Accessed on May 22, 2026, https://24.kg/vlast/272876_sadyr_japarov_rasskazal_pochemu_ego_kritikuyut_nekotoryie_smi/.

¹⁰² IREX. (2024). *Vibrant Information Barometer: Kyrgyzstan 2024*. Accessed on May 22, 2026, https://www.irex.org/sites/default/files/VIBE_2024_Kyrgyzstan.pdf.

¹⁰³ Radio Free Europe/Radio Liberty. (2024, April). *Law Targeting Foreign-Funded NGOs Sends Chill Through Kyrgyz Civil Society*. Accessed on May 22, 2026, <https://www.rferl.org/a/kyrgyzstan-foreign-agents-chill/32893000.html>.

¹⁰⁴ Times of Central Asia. *Shifting Priorities: The Demise of USAID and Media Funding in Central Asia*. Accessed on May 22, 2026, <https://timesca.com/shifting-priorities-the-demise-of-usaid-and-media-funding-in-central-asia/>.

¹⁰⁵ Azattyk Asia. (2023, July). *City Court Overturned the Decision to Close “Azattyk” Following the Ministry of Culture’s Lawsuit*. Accessed on May 22, 2026, <https://www.azattyqasia.org/a/32500372.html>.

Methodology

For this study, a qualitative research method was selected, as it allows for an in-depth examination of the experiences and perceptions of independent media outlets in their interactions with digital platforms. The primary objective of the research is to understand how the editorial boards of independent media in Kyrgyzstan perceive their engagement with digital platforms, what internal decisions and strategies are formulated during this process, and how these editorial teams evaluate their autonomy and agency within this interaction.

The study is structured around the following core analytical blocks:

1. Internal Editorial Decision-Making: Examining the decision-making processes within editorial boards regarding content production and the utilization of digital platforms.
2. Experiences of Blocking and Appeal Procedures: Investigating the underlying reasons why editorial boards face platform sanctions and restrictions, and analyzing how they navigate procedures to have these sanctions overturned.
3. Algorithmic Adaptation and the Boundaries of Platform Influence: Analyzing how editorial teams delineate between strategic adaptation and the direct influence of algorithms on editorial choices.
4. The Psychological Perception of Dependency: Understanding how editorial teams experience their structural dependency on platforms and how this impacts their perception of their professional work.
5. Strategic Sustainability: Investigating approaches to planning, risk mitigation, and the adaptation of operational strategies across various platforms.
6. Inter-Media Collaboration: Analyzing joint practices, collective actions, and the exchange of professional expertise among different editorial boards navigating platform environments.
7. Editorial Agency: Assessing the degree of institutional autonomy possessed by editorial boards and their capacity to assert and defend their own decisions when operating on digital platforms.

Sampling

A preliminary review of the literature, combined with the authors' professional experience within the media sector of Kyrgyzstan, indicates that digital platforms have become the core infrastructure for media operations. This centrality necessitates a systematic analysis of how they interact with various types of media producers. Within the scope of this study, non-state media outlets are of particular interest, as they operate under conditions of heightened pressure and systemic vulnerability, including the imminent threat of criminal prosecution. Furthermore, these outlets are frequently targeted by coordinated online attacks, including targeted harassment campaigns orchestrated by so-called "troll factories." Under these compounding conditions, engagement with digital platforms takes on critical significance, as these platforms simultaneously serve as the primary space for content distribution and an environment of overt pressure against it.

The sampling design comprised two core components: a focus group and a targeted survey (incorporating interviewing elements). The selection criteria included: engagement with public-interest topics; regular coverage of current news events; active utilization of digital platforms for content promotion; and documented experience with online attacks or other forms of structural pressure.

All focus group participants received an oral explanation of the research objectives and the rationale for recording the discussion, after which they provided verbal informed consent for the recording to be used exclusively for research purposes. The focus group discussions commenced with an overview of the study's goals and a clarification that participants retained the right to decline to answer individual questions or to withdraw from participation entirely at any stage. All participant names were anonymized, and any information within the transcripts and quotations that could potentially identify the respondents was excluded.

The survey was conducted via Google Forms and included both closed-ended and open-ended questions. The open-ended questions allowed respondents to articulate their thoughts in detail, which imparted the characteristics of a qualitative interview to the survey and enabled the collection of deeper data regarding the interaction between the media and digital platforms. Personal data of the participants was not collected; therefore, it is impossible to identify individual responses.

Seven representatives from non-state media outlets were invited to participate in the focus group, including editors and key staff members from online newsrooms as well as educational and outreach media projects. The inclusion of participants holding diverse professional roles made it possible to account for both editorial and managerial practices in their engagement with digital platforms.

A total of 16 respondents participated in the survey (which incorporated interviewing elements). The sample comprised 16 non-state, multi-format, public-interest media projects — including officially registered mass media outlets¹⁰⁶ — that maintain active social media accounts and regularly publish news, feature articles, analytical pieces, and video content. Geographically, the sample was represented by Bishkek-based and several regional non-state media projects whose editorial policies are oriented toward adherence to internationally recognized professional and ethical standards of journalism, as well as the coverage of local and socially significant issues, including politics, social problems, human rights, environmental issues, and corruption. It should be noted that a limited number of regional media outlets participated in the survey, as the overall number of non-state media projects has significantly declined recently. Furthermore, the survey did not encompass personal media projects — wherein individual creators or standalone teams manage accounts on digital platforms such as YouTube, TikTok, and Instagram — given that the activity of individual authors tends to be more fragmented, which would complicate the generalization of data. Nevertheless, their experience, particularly that of Kyrgyz-language creators, is of great interest and could serve as the subject of a separate study in the future.

All media outlets included in the sample utilize a multi-platform strategy for content distribution. The most frequently cited platforms are Instagram and YouTube (utilized by all 16 editorial boards), followed by Facebook and TikTok (used by 13 outlets), and Telegram (used by 10 outlets). Threads and X were mentioned only in isolated instances.

¹⁰⁶ According to the Council of Europe Committee of Ministers Recommendation CM/Rec(2011)7 to member states on a new notion of media, which encompasses “all actors involved in the production and dissemination, to potentially large numbers of people, of content (for example, information, analysis, comment, opinion, education, culture, art and entertainment in textual, audio, visual, audiovisual or other form) and applications which are designed to facilitate interactive mass communication (for example, social networks) or other content-based large-scale interactive activities (for example, online games), while retaining (in all these cases) editorial control or oversight over the content.” Refworld. (2011). *Recommendation CM/Rec(2011)7 of the Committee of Ministers to member states on a new notion of media*. Accessed on May 22, 2026, <https://www.refworld.org/ru/legal/resolution/coeministers/2011/ru/137823>.

The sample also reflects the organizational diversity of the editorial boards:

- 6 editorial boards maintain a staff of 5 to 10 employees;
- 4 editorial boards have 10 to 20 employees;
- 4 editorial boards operate with fewer than 5 employees;
- 2 editorial boards employ more than 20 staff members.

The vast majority of the outlets (11 out of 16) possess more than five years of operational experience with digital platforms, while the remaining 5 have been working with them for a period of three to five years.

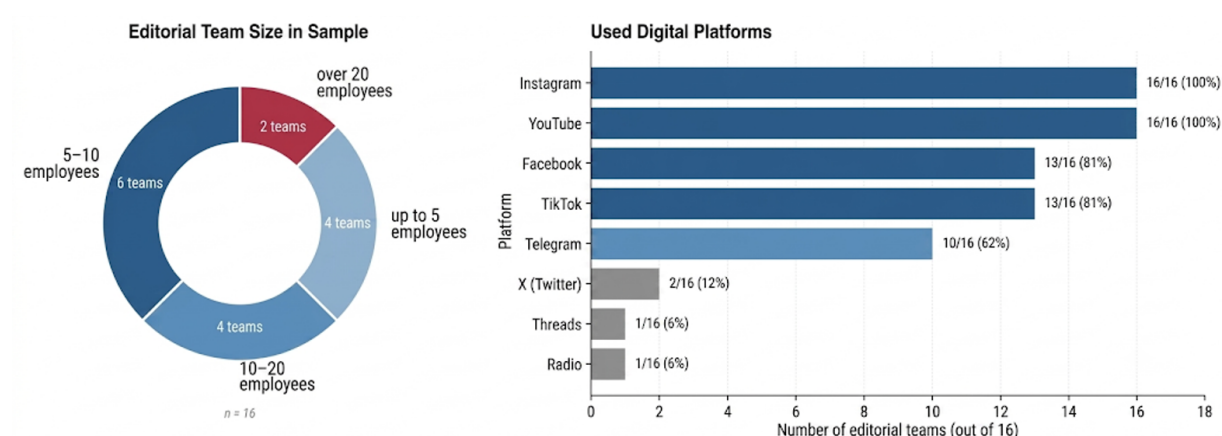


Figure 3. **Sample Composition: Distribution of Editorial Boards by Staff Size and Utilized Digital Platforms** (*n* = 16).

Consequently, the selected sampling strategy ensures informational richness, relevance, and analytical depth through the inclusion of participants with verified experience in navigating interactions with digital platforms under conditions of heightened pressure. This enables a comprehensive, multi-dimensional analysis of the specific dynamics characterizing the engagement of Kyrgyzstan's independent media with digital platforms at both the strategic and operational levels.

BLOCK 01

INTERNAL EDITORIAL DECISION-MAKING

This block aims to analyze how editorial boards respond to the risks associated with operating on digital platforms, how they make decisions regarding content creation and publication, and the specific ways in which experiences of content blocking and platform sanctions influence editorial choices.

PERSONNEL RESPONSIBLE FOR PLATFORM RISKS

The focus group discussion revealed that in most editorial boards, responsibilities associated with managing social media platform risks are concentrated among staff members directly involved in account management. Most frequently, these are SMM (Social Media Marketing) specialists who manage social media feeds, monitor reach metrics, track algorithm changes, and possess practical, empirical knowledge of “what goes viral” versus what might trigger a platform ban or block. Notably, at one of the participating television channels, a camera operator/video editor was designated as the individual responsible for social media platforms. Concurrently, editorial decisions regarding content distribution are handled as a “collective mind” across several newsrooms, involving various combinations of the editor, SMM specialist, advertising department staff, and camera operator/video editor. In contrast, one media outlet participating in the focus group concentrates editorial decision-making solely within the purview of the editor-in-chief, while another delegates this authority to the SMM specialist, whose role has evolved beyond technical execution to actively influencing editorial policy. Furthermore, one editorial board noted that in unresolved or highly contentious situations, the “heavy artillery” — the editor-in-chief — is brought in, though typically as a crisis management intervention rather than part of a systemic operational workflow.

“The SMM specialist sometimes dictates what we should put out. Because after all, he is the one sitting on the platforms, and knows what hits the mark. He throws [ideas] our way, saying, ‘Maybe you should do it like this?’ And our editors react to that.”

“Editors might consult with video editors, with SMM specialists. Like, ‘Should we post this?’ And they are like, ‘No, that will get us banned.’ It is that kind of collective mind.”

“The SMM specialist decides on his own; I have completely trusted him now, so he decides what to publish and what not to publish.”

“The absolute final word on content with us lies with the editor-in-chief. And he is also responsible for ensuring that there are no issues with the social media platforms.”

The survey data confirms the heterogeneous nature of role and function distribution across the sampled organizations. Specifically, 37.5% of the editorial boards reported that they do not have a dedicated specialist responsible for assessing risks associated with operating on digital platforms. Another 43.8% indicated the existence of such a role (with the most frequent response being the editor and/or SMM specialist), while 18.8% noted that these corresponding functions are performed only partially.

Presence of an employee responsible for risk assessment when working with platforms

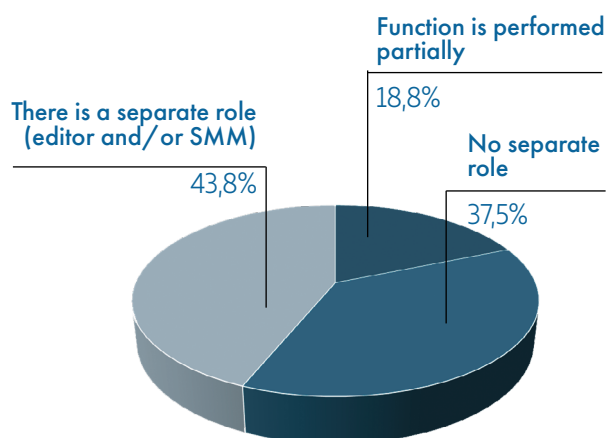


Figure 4. **Availability of a Dedicated Staff Member Responsible for Platform Risk Assessment**

(n = 16).

RULES FOR OPERATING ON DIGITAL PLATFORMS

The focus group discussion also demonstrated that in editorial boards that had previously experienced strikes, bans, or prolonged shadow bans, specialized digital security protocols began to emerge.

"There were strikes, and after that, we developed rules for digital behavior and specified what content we do not publish. [...] A digital security protocol was established."

"We were forced to codify security protocols. We have a division of labor regarding who works with which platforms. And we have obligations, meaning accountability. Previously, we had a single person responsible. And as I mentioned, we ran into problems when that individual was inactive, but now we clearly know who is responsible for what."

In other editorial boards, despite having experienced bans in the past, decisions regarding what to publish on social networks are made intuitively, without any formalized rules.

"Everything is based on intuition. There are no written rules."

ANALYSIS OF BLOCK 1

A comparison of the focus group and survey data indicates that every surveyed editorial board has a dedicated staff member or function dedicated to interacting with social networks. In some newsrooms, this role is explicitly assigned to SMM specialists, while in the majority, a principle of collective decision-making governs social media publishing and the appeal process. On one hand, this demonstrates that editorial boards are gradually developing their own formats for interacting with platforms — namely, internal risk management practices. However, it is evident that this function is not yet clearly institutionalized. On the other hand, the existence of such a function indicates that newsroom structures are shifting; in several instances, the role of SMM specialists has expanded beyond the technical distribution of content and is beginning to influence broader editorial decisions. Concurrently, it is crucial to recognize that these rules of engagement with digital platforms are not formed theoretically, but rather emerge as a direct response to concrete, lived experiences, which themselves are constantly evolving.

BLOCK 02

EXPERIENCE WITH CONTENT BLOCKING AND APPEAL PROCEDURES

This block aims to determine whether editorial boards have encountered platform sanctions and to identify the measures they have taken to overturn decisions they perceived as unjust.

The focus group discussion revealed that all participants had experienced various forms of sanctions, including account blocks, strikes, shadow bans, and content removal.

"Our pages get reported, mostly by trolls. [...] We engaged three large international organizations to resolve our issue. [...] Within six months, we managed to resolve the matter [regarding the Facebook page block], and then they [Meta] issued an apology. [...] Even so, despite the apology, we did not get out of the shadow ban. That is, we only emerged from the shadow ban a year later.»

"We had an experience with a block on Facebook. [We] also kept writing, writing, and writing. In the end, it turned out that Meta required us to remove all account administrators."

"TikTok is just so sensitive; it either drops [the video] into drafts or simply restricts views when certain scenes are present. It could be footage of fights or if something isn't blurred enough."

"Regarding a strike on YouTube, we also appealed and wrote letters several times, but YouTube never replied — it was a copyright strike."

"Right now, we have two pages [...] one Kyrgyz-language and one Russian-language, and it [TikTok] is starting to remove [content] due to duplication."

"And the second frequent issue is YouTube. Despite taking music from the library, it gets blocked. In most cases, this cannot be restored, so we just re-upload it and change the music. But even after re-uploading, the view count remains very low."

In instances of severe sanctions, focus group participants contacted platform support services, noting that platform response times to their appeals varied from a few hours (TikTok, in isolated cases) to several months (Facebook, YouTube). Following these appeals, editorial boards either received no response at all, received one with a delay of up to six months, or received a formal apology. Furthermore, even in cases of successful appeals — where the platform acknowledged its initial decision as an error and formally lifted the restrictions — reach metrics sometimes failed to recover.

"TikTok basically resolves issues within one business day. On YouTube, yes, it took longer. Sometimes they might not even reply at all."

"Our Instagram page was hijacked. And it took them six months to react. They don't react immediately at all. Which is why writing to them makes no sense whatsoever."

"We write [to YouTube] immediately; sometimes they understand right away and lift everything. That time we wrote, they didn't react. Then we were supposed to be unblocked somewhere around mid-December, but they unblocked us in November. But even so, our views were never restored."

"We contacted Google directly so they could help us somehow, but there was no follow-up response from Google. That is to say, it was out of our hands, out of our newsroom's control."

The survey further revealed that attempts to appeal platform decisions require substantial resources. Specifically, 18.8% of the editorial boards noted that they resort to appeal procedures occasionally, but find it to be a serious burden that demands significant time and human resources. Another 18.8% stated that they do so rarely and only in exceptional cases, while 12.5% of respondents indicated that they allocate resources to appeals regularly, representing a noticeable strain. Conversely, another 12.5% reported that they expend no resources on appeals at all, or do so occasionally without facing a significant burden. Additionally, 6.3% of respondents stated that they had not encountered such situations within the past year and a half, but noted that if they were to face them, they lack the resources to pursue such procedures. Finally, 6.3% indicated that they had not encountered any need to appeal platform decisions they deemed unfair, and another 6.3% found it difficult to answer.

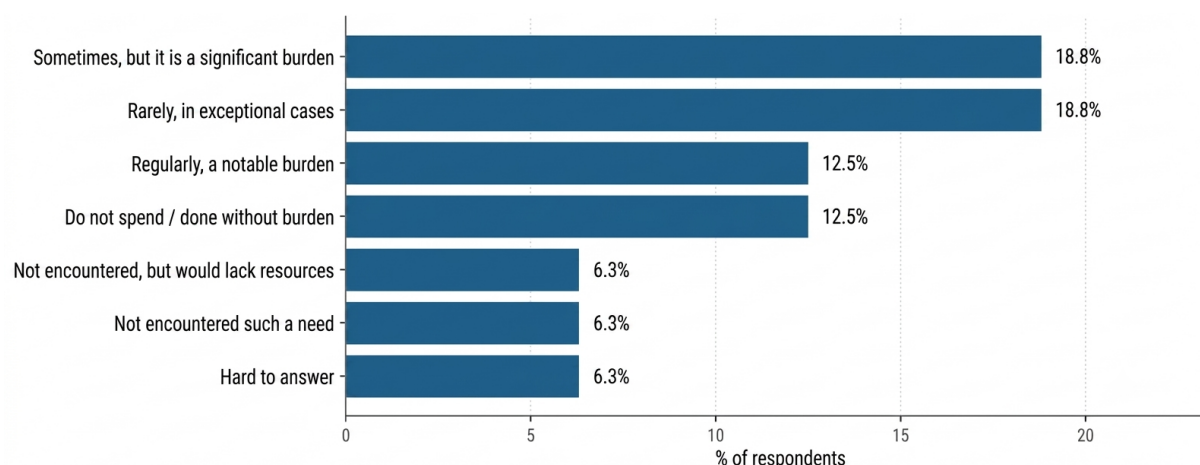


Figure 5. **Resource Expenditure of Editorial Boards on Appealing Platform Decisions** (n = 16).

Thus, a significant portion of the editorial boards (approximately half) resort to platform decision appeal procedures to some extent. For a notable share of these organizations, this process entails substantial investments of time and human resources, which can create an additional burden on editorial workflows.

According to participants, the only effective ways to resolve a blocking issue are through personal contacts within Meta or by involving international organizations and embassies in the process.

"As it turns out, you can only solve this problem if you have an acquaintance at Meta. That is literally the only option. And you have to reach these acquaintances through the acquaintances of acquaintances."

"We resolved this issue with you [the Media Policy Institute]. We practically engaged three massive, major international organizations to solve our problem. Even the embassies."

ANALYSIS OF BLOCK 2

Based on the data gathered from the focus group and survey, it can be concluded that the majority of editorial boards have encountered platform sanctions they perceived as unjust, and approximately half of them resorted to appeal attempts. The experience of appealing is perceived by respondents as lengthy, unpredictable, and frequently futile. In certain cases, the issue of unfair sanctions is resolved not through formalized platform support mechanisms, but rather via non-institutional channels — such as personal contacts or the involvement of international organizations to mediate between the media outlet and the platforms. Confronted with opaque platform moderation rules and unequal access to appeal procedures, media newsrooms are beginning to adapt to platform regulations.

BLOCK 03

ALGORITHMIC ADAPTATION AND THE LIMITS OF PLATFORM INFLUENCE

This block aims to understand how editorial boards adapt to the rules of automated algorithmic moderation, what tactics they employ to bypass these algorithms, and how this process affects editorial policy. Additionally, this block seeks to determine where, from the perspective of the media outlets, the boundary lies between adjusting to algorithms and outright platform interference in editorial policy.

ADAPTATION OF EDITORIAL PRACTICES

Numerous examples of prolonged and, in several cases, unanswered attempts to appeal blocks that media outlets deemed unfair have forced editorial boards to adapt their content to the new digital reality. According to focus group participants, upon receiving warnings about potential platform rule violations, they generally prefer to adjust the content or refrain from publishing it altogether.

"In TikTok, when we upload, a warning pops up right away. If we see a warning, we prefer not to publish that content to avoid getting a strike."

"And it is the exact same thing on Instagram. That is, if we see [issues] regarding copyright or, for example, violence at the upload stage [...], we try to blur it. If even that does not help, we do not publish it."

"In general, we realize that [the content] will most likely not make it, so we just delete [the material] [...] and re-upload it with modified music."

"We haven't had bans, just a deleted post. We were like, okay, we'll do everything properly next time, or we'll try to appeal it. But overall, because the entire newsroom is inherently geared toward social media anyway, everyone already senses when something might go wrong with a video, and we try to act preemptively."

Survey responses indicated that just over half of the editorial boards (56.3%) had not encountered situations where they preemptively chose to refrain from publishing specific topics to avoid risking potential platform sanctions. Concurrently, 31.3% of the survey respondents noted that they occasionally resort to this practice, while 12.5% stated that they do so on a regular basis. Among those who had faced the necessity of refraining from publication, 43.8% of the respondents explained their choices as follows:

"Platform algorithms are a positive tool because they help us understand our audience better. However, they frequently artificially promote certain topics, thereby effectively dictating to newsrooms which issues to cover and which to ignore."

"Meta curtails media reach, arguing that it wants to minimize negativity on its platforms and instead encourage people to communicate with one another. This restricts the growth of media pages and forces us to censor content."

In response to an open-ended question regarding whether they had ever been forced to alter their editorial policy, 32.5% of the newsroom representatives provided detailed descriptions of instances where they adapted content to platform policies, noting that they had to modify specific content elements "preemptively" to avoid triggering sanctions.

"For instance, following the tightening of Meta's policy regarding violent content, the SMM department decided on its own to replace letters in certain words."¹⁰⁷

"We refrain from publishing content that contains footage of violence or blood, or features children, as well as placing medical advertisements."

However, the majority of respondents (62.5%) indicated that their editorial policy had not formally changed:

"Specifically, we have not had to change our editorial policy. And there have been no instances where Instagram or TikTok deleted our content on their own. But there are moments when we act preemptively. Always, before releasing a piece – even at the topic selection stage – we consider the potential consequences of controversial issues every single time."

It is probable that, at this stage, practices such as editing, deleting, or refraining from publishing materials to comply with algorithms are viewed as situational adjustments rather than a fundamental revision of editorial principles. Additionally, this perception may be influenced by the fact that a portion of the editorial boards does not face platform sanctions directly. For instance, in the section *Experience with Content Blocking and Appeal Procedures*, about a third of the respondents indicated that they had not experienced such cases within the past year and a half, or had never faced the need to appeal platform decisions at all.

Nevertheless, despite the fact that editorial boards state their formal policies remain unchanged, their responses indicate that platform algorithms are, in fact, driving a transformation in editorial decisions regarding content selection. Furthermore, an analysis of the responses in this section reveals that adaptation often manifests as a set of preemptive actions aimed not only at avoiding sanctions, but also at adjusting to the sheer unpredictability of algorithms.

TACTICS FOR BYPASSING ALGORITHMS

According to focus group participants, one such measure is the practice of avoiding specific words to evade platform sanctions. Participants noted that such requirements do not exist in the official rules of the platforms; rather, this knowledge was acquired via word of mouth. As a result, certain socially significant topics are covered using coded language or "live" exclusively on websites. For instance, one focus group participant noted that news regarding youth suicide is published solely on their website. Similarly, the topic of "animal cruelty" has also become taboo on digital platforms. Among the words that newsrooms avoid most frequently, respondents specifically mentioned "suicide", "violence", "rape", and "weapons".

"Someone started doing it, and we were like, oh, maybe we should do it too, let's just do it just in case [...]. It's not in the algorithms, and it's not mentioned when you talk to support. But we introduce these things. Just in case."

¹⁰⁷ To avoid post blocking, reduced reach, or shadowbans for using prohibited words on social media, users intentionally violate spelling norms by omitting letters or replacing them with numbers and symbols, such as "p_dophilia", "r*pe", or "P@l3st1ne".

"We do write about violence; it is just that we [...] code certain words."

"We have completely stopped using words like weapons, firearms, or suicide. In Instagram, in this country, nobody ends their life. Do you think it is because fewer children are killing themselves now? They only kill themselves on the website."

"But we, in fact, do the exact same thing, naturally. However, we do not know how effective it is. For all we know, we could have posted it as is, and nothing would have happened."

Among other techniques for bypassing algorithms, newsrooms noted replacing letters in words (using asterisks or spaces), word coding, "bleeping out" words in videos, and refraining from using photos and videos altogether. Interestingly, editorial boards operating in the Kyrgyz language have not yet faced the issue of word replacement, due to the fact that Meta "does not yet recognize the Kyrgyz language."

"In videos, we try to bleep out words, or if there are subtitles, we put an asterisk or change something there. TikTok is much stricter."

"We have more deletions on TikTok. In the very beginning, 5 or 6 pieces of content were deleted [...] because we didn't code words like "blood," "violence," or "murder," but then we figured it out, and now there are fewer [deletions]."

"We tried, for instance, producing a piece using artificial intelligence about death and femicide. Overall, it performed well."

"Because all of our content is in Kyrgyz, we have probably encountered fewer cases of this nature."

The focus group discussion also demonstrated that some editorial boards have established written rules regarding the use of specific words and topics. In most cases, these rules are grounded in personal experience working with the platforms (i.e., previous sanctions).

"We have checklists for video editors based on experience. When we got hit with sanctions, we realized it's better not to do things that way. Mostly, to be honest, it is related to violence."

At the same time, certain focus group participants noted that they had published sensitive content without any restrictions and had not encountered sanctions, underscoring the fact that platform rules are often applied inconsistently.

"As it turns out, we are completely carefree and careless. We don't think about being banned at all, and we don't take any precautions whatsoever. Because we definitely had two pieces specifically about suicide, and we just put "suicide" right out there. [...] On YouTube, on TikTok, and on Instagram. Apparently, we just got lucky."

The survey data confirms the widespread prevalence of word avoidance practices. When asked how often their newsroom avoids publishing specific words, 31.3% of the editorial boards responded that they do so very frequently (e.g., words like "war," "violence," "suicide"), 31.3% do so rarely, 18.8% sometimes, 12.5% frequently, and only 6.3% never. In their open-ended responses, some newsrooms noted that word avoidance makes it difficult to cover certain issues:

"Anything related to gender-based violence. For instance, TikTok bans words like "rape," "murder," "suicide," and so on. Yet without these words, it is extremely difficult to cover gender-based violence in Kyrgyzstan. The same applies to anything involving content about children."

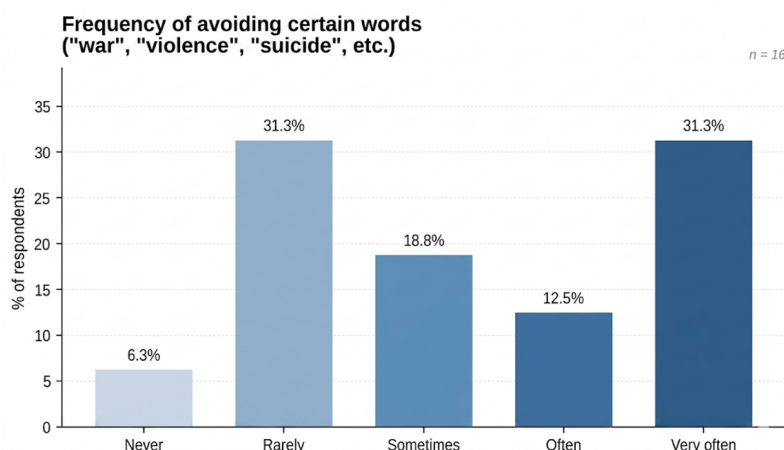


Figure 6. Frequency of Specific Word Avoidance Across Editorial Boards (n = 16).

The survey data also demonstrated that socially significant topics are the most vulnerable to algorithmic restrictions. In particular¹⁰⁸:

- Politics and elections – 75%;
- Social issues and human rights – 43.8%;
- Corruption – 37.5%;
- Economy and business – 18.8%;
- Incidents and emergencies – 6.3%.

Separately, 6.3% of the respondents highlighted restrictions regarding health-related topics (for example, breast cancer and other women's health issues), which algorithms interpret as violations of rules concerning nudity.

Concurrently, 6.3% of the respondents indicated that they had not experienced such restrictions in their practice.

The survey also helped determine how frequently editorial boards resort to various techniques to bypass algorithmic restrictions or filters (e.g., rephrasing words, using synonyms or euphemisms): half of the respondents (50%) confirmed that they employ special techniques regularly, 37.5% answered that they use them occasionally, 12.5% rarely, and 6.3% do not use them at all.

¹⁰⁸ When answering this question, respondents could select multiple options.

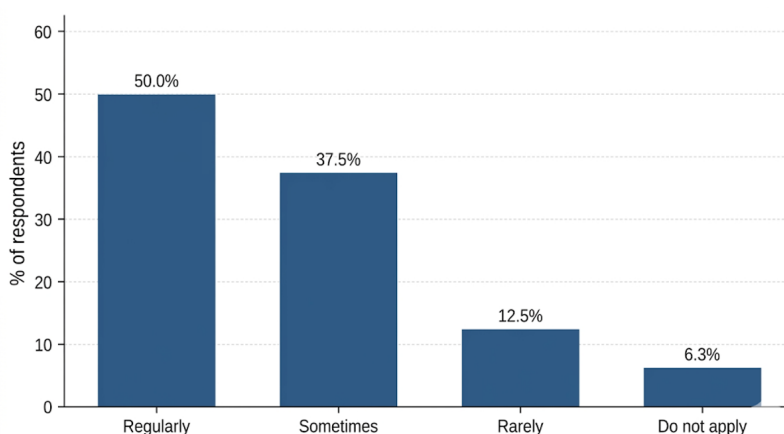


Figure 7. Utilization of Techniques to Bypass Algorithmic Restrictions (n = 16).

"A portion of the content (for instance, regarding violence, suicide, murder, etc.) is not published on any platform due to the risk of deletion. Instead, it is published on Telegram, for example, because there is no risk of deletion there, but this limits the views."

At the same time, respondents rated the effectiveness of these techniques for retaining audiences or avoiding sanctions as only partial: 62.5% believe they help partially, 25% feel they are very helpful, and 12.5% state that the effect is weak.

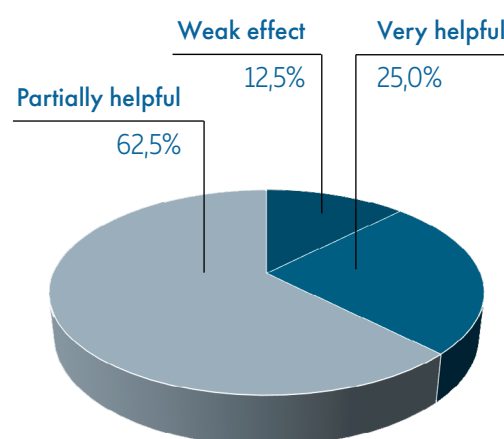


Figure 8. Assessment of the Effectiveness of Techniques for Bypassing Algorithms (n = 16).

THE IMPACT OF ALGORITHMS ON CONTENT QUALITY

Focus group participants highlighted a trend toward simplifying content, altering its format, and reducing its length to appease algorithms and maximize reach. For a subset of the participants, this shift toward viral and "sensationalist" content is perceived negatively, as it contradicts the original mission of the media to "transform the audience."

"Our mission used to be to transform the audience; now, the audience is transforming us."
"In some areas, there is self-censorship; in others, conversely, it helps us improve; and in some places [...] it is content created purely for the algorithms. We know it will go viral: along the lines of some crocodile in Australia wandering somewhere. Well, it is yellow journalism, objectively speaking."

"We simplify, yes, because while you have to source truly compelling content, you also know that people won't watch it in its original form."

"We produce proper, high-quality material – we do real work. Then we look, and see that we've stalled. So we roll out something a bit sensationalist. Even though our pieces shouldn't be like that, we occasionally include them just to keep everything running."

"We censor ourselves because of what is prohibited. That is, the SMM manager tells us that you can't have violence on TikTok, you can't have fights on TikTok, you can't have blood on TikTok, and all that. And we really do not post anything of the sort there. He also tells us that something 'won't take off' on Instagram. [...] We genuinely refrain from doing it because they might either block us, or it would just be a waste of time, effort, and money to make something that won't perform well."

Another group of participants views these modifications as a response to shifting audience preferences. Participants also pointed out positive aspects of algorithmic influence, such as reducing the length of materials to enhance content clarity, eliminating pirated content, and protecting children's rights.

"Social media platforms adapt to algorithms and the audience. They don't just come up with this out of nowhere. It turns out that audiences do not watch videos longer than 90 seconds. Therefore, we try to take this into consideration as well. It feels like a mutual relationship."

"We have completely eradicated piracy on Facebook and YouTube."

When asked whether they believe their newsroom's dependence on digital platforms affects the quality of the content produced, 50% of the survey respondents answered that it "has no impact," 25% stated that it "reduces quality," and 12.5% noted that the quality of their materials has improved. Furthermore, 6.3% remarked that in the pursuit of audience attention, they are forced to produce short-form video content without sacrificing quality, which is "extremely difficult." Another 6.3% responded that they have to adapt to the algorithms, formats, and rules of social networks, but that this is simply "the reality of life."

The described processes of content simplification and the integration of viral formats indicate that editorial boards are aligning themselves with an algorithmic logic oriented toward engagement and clickability. Editorial decisions shifting toward algorithmic logic reflect a transformation of the traditional media role of agenda-setting, as the agenda now serves not only the public interest but also the interests of the platforms. As evidenced by the study's findings, the editorial attitude toward algorithmic influence remains ambivalent: some newsrooms express dissent regarding this situation, while others interpret content simplification as an adaptation to audience demands. Such a perception of algorithmic requirements as neutral or even positive — rather than restrictive — may indicate either the normalization of algorithmic pressure or could be linked, among other factors, to a lack of direct experience with arbitrary platform sanctions among certain newsrooms.¹⁰⁹

¹⁰⁹ This section contains data on blockings and appeals experiences.

PERCEPTION OF ALGORITHMS

When asked whether newsrooms believe that platform algorithms are impossible to predict or alter — and that there is therefore no use in resisting platform decisions — respondents demonstrated an ambiguous stance:

- 43.8% — believe that it is sometimes impossible;
- 18.8% — believe that it is frequently impossible;
- 18.8% — gave a negative response, believing that algorithms can indeed be predicted or altered;
- 18.8% — believe that predicting or altering algorithms is possible, but rarely so.

The fact that a significant portion of respondents highlighted a low level of platform predictability confirms that editorial boards operate within an atmosphere of uncertainty, where algorithms are perceived as having limited vulnerability to external influence. This, in turn, points to an acknowledgment of the structural asymmetry that exists between the media and platforms.

During the survey, editorial boards were also asked to evaluate the statement that “Platforms are private businesses, which means they have the right to establish any rules they see fit, and the media must simply adapt.” The respondents’ answers revealed a dual attitude toward this assertion, with the majority of respondents (62.6%) expressing disagreement:

- 43.8% — of respondents somewhat disagree with this statement;
- 31.3% — somewhat agree;
- 18.8% — completely disagree;
- 6.3% — completely agree.

Platforms are a private business, media should simply adapt

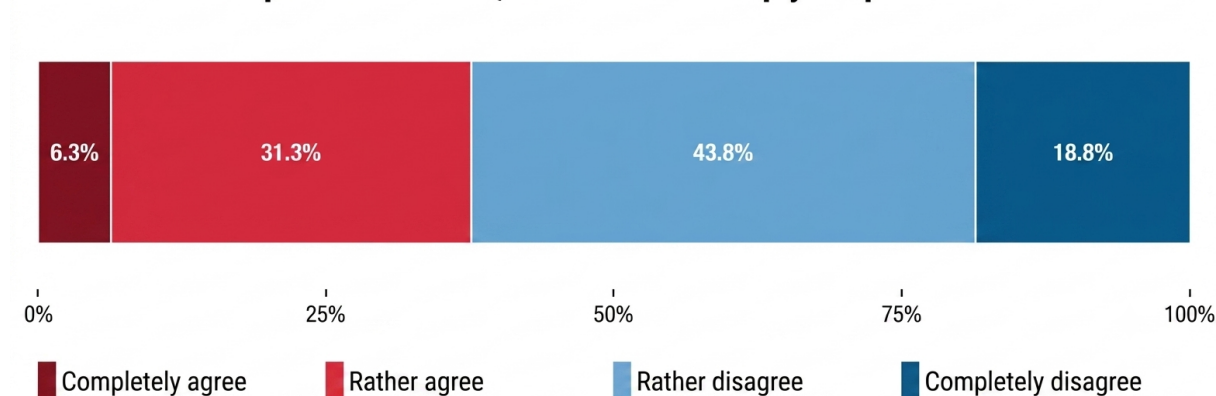


Figure 9. Editorial Attitude Toward the Statement on the Right of Platforms to Establish Any Rules
(n = 16).

Thus, among those editorial boards that have faced platform sanctions and the necessity of content adaptation, a significant portion disagrees with the current principles of platform functioning. The lack of support among a substantial share of respondents for the idea of absolute autonomy for digital platforms demonstrates a lingering normative expectation of their accountability.

ADAPTATION VS INFLUENCE

The line between adapting to algorithms and interference in editorial operations is drawn at content rather than format. This was the conclusion reached by the focus group participants, who clearly indicated that interference constitutes instances where a platform bans the coverage of socially significant issues (such as accidents or emergencies), if a platform were to influence an editorial stance (such as banning coverage on freedom of speech), or if it repeatedly blocked a media outlet's account.

"Blocking an account – I believe that already constitutes interference on the part of the corporation."

"Take an emergency or incident – from a journalistic standpoint, that is socially significant content. Does it fall under Meta's bans? Yes and no. Does Meta accurately detect all content? Not always. It's Russian roulette. Now that is a serious problem."

"We had a ban on Instagram live streams for a year and a half. We were shadowbanned for six months because of a press release from the Ministry of Labor regarding a signed memorandum with some Russian migration service about some migrant training. We were hit with sanctions because Zuckerberg believes that was human trafficking propaganda."

"And an account ban can be unfair, yet the losses are very severe. And that, I believe, is completely over the line."

"It seems to me that for us, adapting to platforms does not affect our editorial policy in any way, because we only change the format. We do not change the content."

A subset of the focus group participants noted that they do not feel platform censorship because they operate in accordance with ethical standards that are identical to platform rules.

"...we have an entire code of ethics, standards, and an editorial policy, and we do not deviate from them. We do not feel that global platforms censor us because community guidelines are, in essence, the same."

Similarly, survey participants delineated the difference between adapting the format (altering post length or optimizing headlines for social media) and actual pressure or the imposition of platform policy (account suspensions, post removals without explanation, strikes against legitimate content)::

"Due to social media algorithms, we often have to abandon certain topics that do not achieve high reach, even though I believe they would be highly beneficial to our audience."

"We have to adapt to clickable headlines."

When assessing the causes of algorithmic restrictions, 37.5% of the survey participants noted that the restrictions are aimed at “silencing” individual publications, while another 37.5% found it difficult to evaluate their objectives. A quarter of those surveyed (25%) perceive the restrictions as accidental algorithmic errors, whereas 18.8% believe that the restrictions may be intended to diminish the influence of the newsroom or the media outlet as a whole.

According to respondents, the most effective measures to minimize the impact of algorithmic restrictions on local content are:¹¹⁰

- Rephrasing and adapting content to meet algorithmic requirements – 56.3% (9 out of 16);
- Utilizing alternative platforms and distribution channels – 50% (8 out of 16);
- Training newsrooms in digital literacy and algorithmic strategies – 43.8% (7 out of 16);
- Platform compliance with the principle of “due prominence” — guaranteed visibility of socially significant content on platforms – 25% (4 out of 16).

The analysis shows that the distinction between adaptation and interference is theoretical rather than practical in nature. It is precisely through the modification of format (word coding, abandoning certain distribution channels, etc.) that specific topics drop out of public discourse or receive less coverage. Crucially, in the estimation of editorial boards, it is socially significant topics that exhibit the greatest vulnerability to algorithmic restrictions. This further indicates that platform influence affects not only the format of content but also the very substance of news materials.

ANALYSIS OF BLOCK 3

The research data clearly demonstrates that the boundary between “adaptation” and “interference” is deeply blurred. Although newsrooms claim to modify only the format of their published content, practices such as omitting specific words, avoiding certain subjects to evade sanctions, or introducing viral content into the newsfeed nevertheless signal a covert platform influence over editorial policy. This dynamic directly impacts discourse formation on social media, where users may be deprived of access to socially important information (such as the topic of youth suicide). Furthermore, it is noteworthy that decisions regarding whether to publish specific content are made prior to the imposition of any actual sanctions, guided instead by the anticipation of potential restrictions and the “economics of reach.” The latter can also be classified as a tool of algorithmic influence. The underlying causes of algorithmic restrictions are not always transparent to the media. The constant pressure to adapt and make preemptive decisions likely affects not only the content itself but also the psychological well-being of newsrooms, generating a distinct level of stress. Among those respondents who have encountered platform sanctions and the subsequent need for content adaptation, a significant portion disagrees with the current operational principles of digital platforms. The lack of support among a substantial share of respondents for the idea of absolute platform autonomy underscores a lingering normative expectation of their accountability.

¹¹⁰ When answering this question, respondents could select multiple options.

BLOCK 04

PSYCHOLOGICAL PERCEPTION OF DEPENDENCE

This block analyzes the psychological impact of digital platforms on editorial operations, focusing on the level of stress generated by platform dependence and its associated risks

SOURCES OF STRESS

Focus group discussions revealed that the opacity of platform moderation mechanisms serves as a primary source of stress, with institutional interactions frequently structured around trial and error. In certain instances, failing to receive a response to their appeals, editorial boards are forced to accept platform decisions as a given and simply wait for the sanctions to expire.

"Massive troll attacks [...] and severe sanctions like [...] entering a shadowban, account blocks, and hacking attempts. So yes, it is stressful regardless. Those are the two main vectors."

"Our video editor always experiences stress because he works directly with YouTube. Copyright issues trigger the highest number of strikes [...]. That is a major source of stress for us. We are forced to delete content from the channel or restrict access to it."

"Yes, it happened—our page was hijacked. I spent 45 minutes talking to a Meta representative, but I never understood what he got from me, nor did I understand what I got from him. Then he just vanished, and that was it. The page was never recovered."

At the same time, for a portion of the newsrooms, platform-related risks are secondary compared to the risks associated with potential violations of local legislation.¹¹¹ Specifically, participants noted that coordinated attacks by trolls and fake accounts can lead to a sharp surge in the comment sections beneath publications. Some of these comments can be highly sensitive and may be interpreted by authorities as "incitement to interethnic discord." Thus, platform risks and political risks become deeply intertwined.

"The greater stress stems from local legislation. Not platform sanctions."

"You upload something, forget about it, then open it by chance – and World War III is already playing out there. And you think: damn, what are we going to get hit for? So you start hiding the comments. Hit by whom? By the platform? By the authorities?"

"The fakes start attacking. [...] and our SMM manager immediately goes into a coma. The SMM manager faces a dilemma: what to do – respond or just block them..."

"Every journalist responsible for content has moderator-level access; they clean up the comments themselves, but sometimes we just can't keep up. That is, when there are over a thousand comments, a person physically lacks the time to look through every single one. That is a major source of stress for us."

"To a greater extent, the stress is linked to legislative compliance."

Additional sources of stress for a number of newsrooms include the lack of reach growth, a lack of interest from advertisers, and subscriber unfollows. Even with stable revenues, the absence of audience growth is perceived as a vulnerability.

¹¹¹ When interpreting the results, it is necessary to consider the political context of the past year, characterized by the persecution of journalists, which influences the assessments of the focus group participants.

"Our stress comes from the fact that we have no reach. People just don't watch us on social media at all. Because of this, advertisers don't want to come to us."

"Interacting with platforms ranks about 35th on our line of stressors, but the metrics pressure us anyway."

"If we look at these problems, then [...] the pressure of metrics is one, and the second is that the dependence on platforms is real."

"Regarding YouTube, there is the same issue where certain content is demonetized because YouTube screens it while you are uploading, saying everything is fine. But after the upload, YouTube goes, 'well, this one won't be monetized.' You just can't guess ahead of time."

The survey data revealed a similar pattern.¹¹² The most severe source of stress for respondents turned out to be the unpredictability and sudden mutability of algorithms (81.3%; 13 out of 16). The second most significant source of stress cited by respondents was public attacks, trolling, and mass reporting (62.5%; 10 out of 16). Furthermore, survey participants pointed to a perceived injustice in platform decisions regarding removals and restrictions (37.5%; 6 out of 16), alongside the pressure of metrics¹¹³ and the necessity of continuous content production (37.5%; 6 out of 16). Additional sources of tension include dependence on one or two key platforms (31.3%; 5 out of 16) and prolonged wait times or a complete lack of response from support services (18.8%; 3 out of 16).

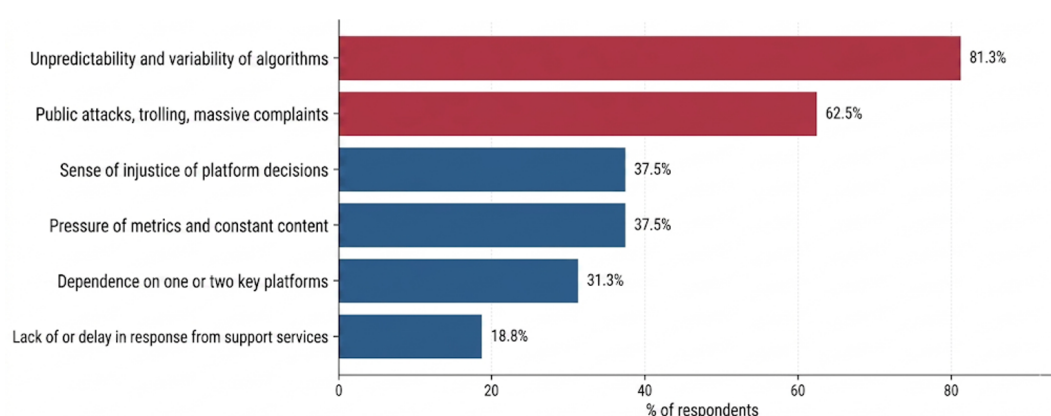


Figure 10. Sources of Stress in Editorial Operations (n = 16, multiple responses allowed).

During the survey, respondents identified coordinated mass reporting that can trigger sanctions as the most significant operational risk (56.3%), followed by erroneous restrictions or content removals (25%), and sharp, unexplained shifts in reach (18.8%).

Thus, it can be noted that all editorial boards encounter one source of stress or another. For a portion of the newsrooms, this stress possesses a political and legal character, whereas for others, it is induced by algorithmic uncertainty and potential economic repercussions, including a decline in revenue.

¹¹² When answering this question, respondents could select multiple options.

¹¹³ Metrics are numerical indicators of SMM performance, measured in figures to evaluate strategic success and audience engagement

PERCEPTION OF ACCOUNT LOSS RISK

The risk of losing an account on a core platform — one of the potential consequences of severe sanctions — is perceived by newsrooms as both high and uncontrollable. In the view of several participants, this risk is primarily linked to constantly shifting algorithms rather than editorial errors, which further intensifies the level of stress.

"The risks are high. Because these are third-party platforms, and they do whatever they want there. And they are constantly changing the algorithms, and we can't even keep up. We can barely master one thing before new algorithms appear."

"With Facebook, you can still manage it somehow. Put up some protection. But TikTok is completely different. TikTok is a total dark forest. The Chinese algorithm."

"Everything is written so broadly there, and you just don't know what might get you targeted next time, or what exactly you should avoid doing. Every single time, you feel a sense of dread."

A similar pattern emerged from the survey data. When asked about the level of stress that the risk of account loss causes within their newsroom, 75% of respondents stated that it induces a significant level of stress, while 18.8% reported a moderate level, and 6.3% experienced negligible stress.

At the same time, survey responses regarding the perceived probability of account loss demonstrate a broader spectrum of perception: 25% of respondents assessed the risk as minimal (noting there are strikes for unclear reasons, making blocking possible); 25% found it difficult to provide an assessment; 18.8% described the risk as low (indicating that while isolated strikes occur, there is no serious risk of loss); 18.8% viewed the risk as moderate. Only 12.4% evaluated the risk as high because their account had already been subjected to a ban in the past.

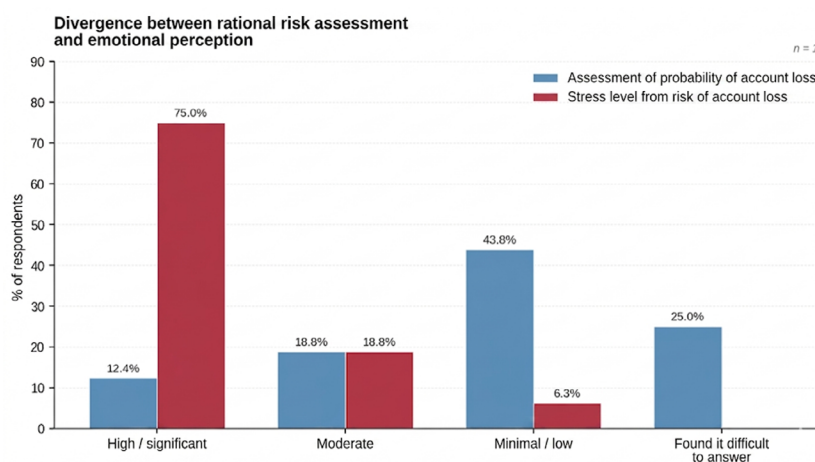


Figure 11. **Discrepancy Between the Rational Assessment of Account Loss Probability and the Emotional Perception of the Associated Stress** (n = 16).

The findings may indicate a discrepancy between the assessment of account loss probability and its emotional perception (the level of stress it induces). While a significant portion of survey respondents evaluates the probability of account loss as low, the focus group responses demonstrate a more vivid perception of risk. According to several studies,¹¹⁴ collective discussion within a focus group format can amplify emotional experiences. In this regard, it can be hypothesized that the focus group format allowed participants to discuss the issue in greater detail, share experiences, and evaluate the risk as higher based on the ongoing discussion. Thus, the variance in assessment can be attributed to the different data collection formats.

The survey data also indicated that in the event of account loss, the factors¹¹⁵ causing the greatest stress for newsrooms would be the risk of losing their core audience (62.5%; 10 out of 16), the lack of transparent mechanisms for appealing platform decisions (56.3%; 9 out of 16), and unclear sanctioning procedures (50%; 8 out of 16). A substantial portion of respondents also pointed to the issue of automated moderation, which fails to consider editorial arguments (37.5%; 6 out of 16), as well as a decline in reach and its subsequent impact on revenue (31.1%; 5 out of 16). Additionally, the risks of accumulating strikes leading to subsequent account suspension (25%; 4 out of 16) and the need to reallocate resources toward appeals and content restoration (25%; 4 out of 16) were noted.

ANALYSIS OF BLOCK 4

The responses obtained within this section demonstrate that the psychological perception of dependence manifests on multiple levels. First, there is an intertwining of platform risks and domestic political risks, which mutually amplify one another in the daily operations of newsrooms. Second, a major factor exacerbating stress and the feeling of vulnerability is the opacity and arbitrary application of algorithms and moderation mechanisms. The lack of clear explanations for sanctions and the inefficiency of appeal procedures force newsrooms to make decisions under conditions of acute uncertainty, which diminishes the media's sense of control over the digital environment. The discrepancy between the emotional perception of account loss risk and the rational assessment of its probability further indicates that the high level of stress is tied not merely to the fact of account loss itself, but to its long-term consequences, which can severely impact media operations. This underscores the heterogeneous nature of how threats associated with platform dependence are perceived.

114 Guest G., Namey E., Taylor J., Eley N., McKenna K. (2017). *Comparing focus groups and individual interviews: findings from a randomized study* // International Journal of Social Research Methodology, 693–708.

115 When answering this question, respondents could select multiple options.

BLOCK 05

STRATEGIC RESILIENCE

The objective of this block is to ascertain the contingency plans of editorial boards in the event of losing key platforms, as well as the resilience of newsrooms should their primary account be banned.

LEVEL OF PLATFORM DEPENDENCE

Focus group discussions revealed that the majority of newsrooms perceive their dependence on digital platforms as exceptionally high. This is particularly characteristic of media outlets that lack their own standalone websites and operate entirely within social networks. Judging by the responses, maintaining accounts across multiple platforms does not diminish overall dependence, nor does it mitigate operational risks.

"Given that we don't have a website, our dependence on global platforms is 100%. And given that we have four platforms, that means a 25% dependence on each. If, say, one stops working, we still broadcast on the other three. Each of these platforms is important to us. And they truly have their own loyal audiences that watch, value us, and so on."

"If corporations were to block Instagram or TikTok, it would be a severe blow to us. [...] We depend on them very heavily."

"There is a dependence on Instagram. Instagram is what brings in the bulk of our advertising revenue, and God forbid something happens to that page—it's over."

"To be honest, you tend to view bans on TikTok and YouTube a bit more casually, because those are not revenue-generating platforms for us."

"But we still depend on this [platforms] because, frankly speaking, we are currently surviving on it, and donors look specifically at views and brand recognition—meaning the visibility of our newsroom."

The survey data confirms this perception: 68.8% of respondents accept the phenomenon of platform dependence as a normalized part of the digital environment and a necessary condition for editorial operations. Meanwhile, 18.8% evaluate it as an unfair and restrictive factor for media sustainability, while 12.5% point to its continuous intensification over time.

"Given that many platforms are already monopolies (Meta, Google), we are completely dependent on their decisions, which means they can violate our rights at any moment."

"Regarding Google and its AI — it now generates summarized information rather than directing users to specific articles or pages of a publication. Consequently, the audience simply does not reach the publication's pages on these platforms."

The heterogeneity of the responses indicates the absence of a unified interpretive framework for platform dependence among newsrooms, which in itself reflects its ambiguous and multidimensional nature.

RISKS OF MAINTAINING PLATFORM DEPENDENCE

The survey results also demonstrated that editorial boards are acutely aware of the risks inherent in the current model of platform interaction. When asked what risks they foresee for independent media if dependence on digital platforms persists in its current form, respondents identified the intensification of dependence on platform rules and algorithms as the most critical risk — 81.3% (13 out of 16).

Comparable in significance were the risk of account blocks — 75% (12 out of 16) and the loss of direct contact with the audience — 62.5% (10 out of 16). Half of the respondents (50.0% or 8 out of 16) noted an increase in self-censorship linked to the necessity of adapting to algorithms and evading sanctions (e.g., avoiding certain topics and phrases). Additionally, a decline in traffic to proprietary websites and decreased advertising revenue were noted by 25% (4 out of 16), along with constraints on creative and editorial freedom — 25% (4 out of 16).

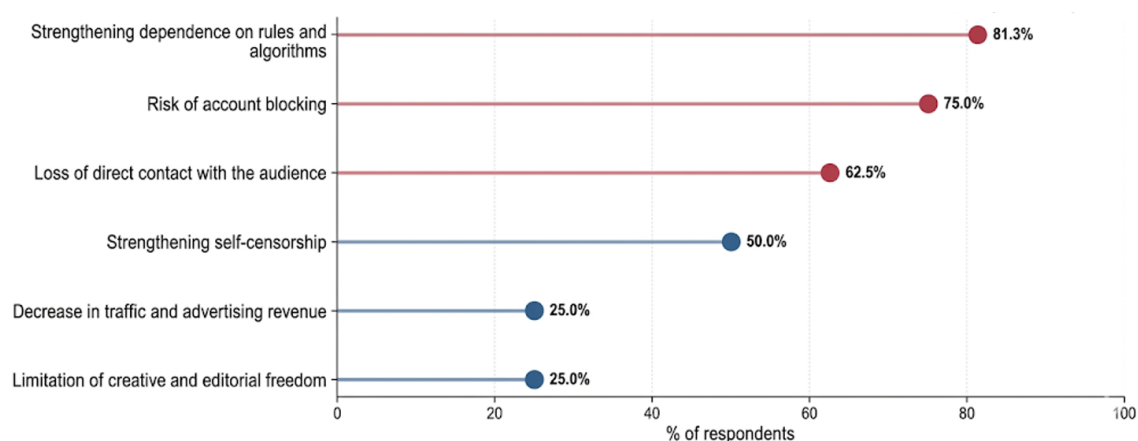


Figure 12. Risks of Maintaining the Current Model of Platform Dependence
(n = 16, multiple responses allowed)

PLAN B IN THE EVENT OF AN ACCOUNT BAN

The majority of focus group participants reported a lack of a formal “Plan B” in the event of an account ban. While participants intuitively understand which steps must be taken during a crisis (appealing the decision, resolving the issue via personal contacts at Meta, or creating a new account), these actions do not constitute a well-defined crisis management plan.¹¹⁶ Creating a new account is perceived as a necessary but not very effective measure, as newsrooms lose both their audience and their source of monetization — a reality that underscores the dependence and vulnerability of media outlets vis-à-vis digital platforms.

“There is no written plan, but we conditionally know which steps need to be executed. That means appealing the decision, and if that doesn't help, then ultimately creating a new account.”

¹¹⁶ To act effectively and promptly in the event of an account ban, it is essential to study the appeal procedures for algorithmic decisions, maintain contact with organizations that collaborate with platforms (such as Access Now), and create a backup account.

"We don't have a written plan either – we want to develop one – but in principle, there is an understanding in our heads. First is the appeal, and most likely, involving acquaintances at Meta so they can help. If that doesn't work out, then we will be creating a new account."

"Naturally, we have a plan to cut costs and downsize our staff by 30%."

"As it turns out, we don't have this kind of plan. In general, we sort of know in our heads that we will keep moving forward and so on, but there is no concrete plan."

The survey results demonstrated limited preparedness among newsrooms for a potential ban on key platforms. The majority of respondents (68.8%) reported having only a partial action plan, whereas only 18.8% possess a clear, fully developed plan. Meanwhile, 12.4% of the digital newsrooms do not have any plan in place. Furthermore, respondents emphasized that the plan remains undeveloped due to a deficit of human resources and time constraints.

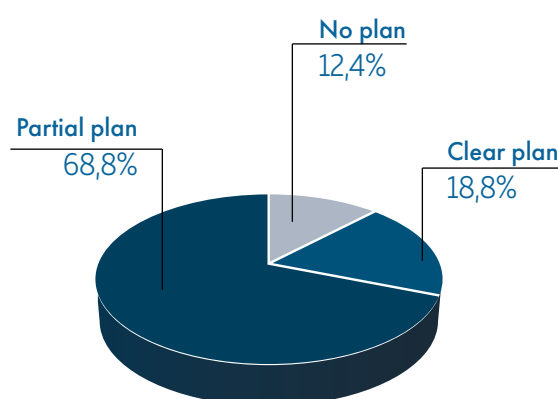


Figure 13. **Preparedness of an Action Plan in the Event of a Key Platform Ban** (n = 16).

The focus group discussions revealed that in the event of a primary platform ban, existing diversification would allow newsrooms to sustain operations on alternative resources for a period ranging from one to several months. However, this transition is viewed merely as a short-term survival strategy, as it is inherently tied to a reduction in profitability and a decline in reach.

"At our current expenditure rate, we would survive for one month. But of course, it would make sense to cut costs immediately rather than waiting."

"We will continue to exist regardless because, when it comes to funding, we have diverse sources. Generally speaking, if it is not on this digital platform, it will be on another."

Survey responses regarding how long newsrooms could function without their key platform demonstrated a high degree of uncertainty. The largest share of respondents (37.5%) found it difficult to assess their resilience, which in itself underscores the absence of clear contingency scenarios. Among those capable of evaluating their sustainability, 25% believe they could continue operating for more than a month, whereas 18.8% could sustain operations for only a few days. An additional 12.4% specified a timeframe of one month, and 6.3% estimated a duration of two to three weeks.

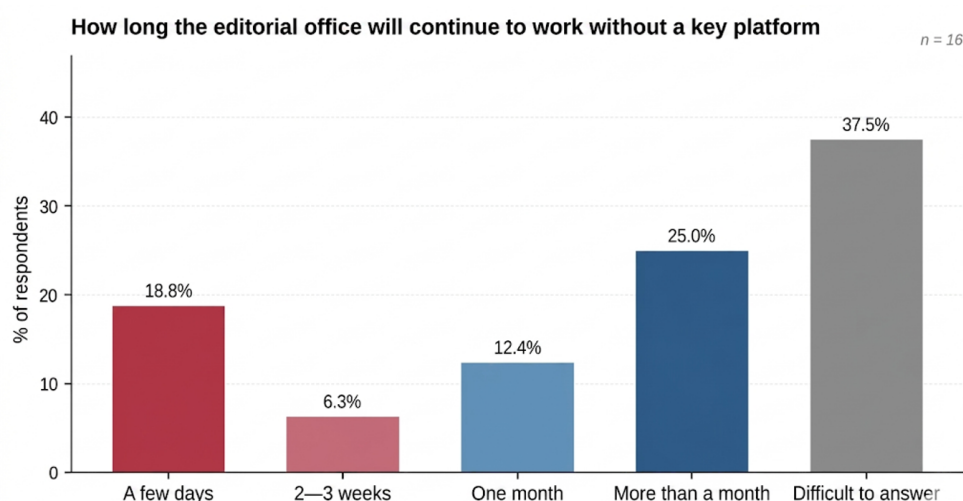


Figure 14. Projected Duration of Editorial Operations Without a Key Platform
(*n* = 16).

ANALYSIS OF BLOCK 5

The gathered data indicates that the strategic resilience of newsrooms is fundamentally predicated on reactive adaptation rather than systematic risk management. The responses obtained within this section point to a high, conscious dependence on digital platforms and a low level of institutional preparedness for crisis situations, including account recovery procedures. While multi-platform diversification may serve as a mitigating factor during an account ban — extending a newsroom’s survival by several months — it does not constitute a sustainable solution to the underlying problem. Instead of strategic approaches to risk management, most editorial boards rely on an intuitive understanding of potential countermeasures. On one hand, this reliance may stem from resource constraints and a lack of specialized competencies, as noted by the newsrooms themselves. On the other hand, the relatively low assessment of account loss probability (43.8% of respondents evaluate it as minimal or low—see *Perceptions of Account Loss Risk*) diminishes the motivation to develop structured risk-response strategies.

Notably, when evaluating risks associated with long-term platform dependence, newsrooms identify the risk of an account ban as one of the most critical threats (75%). At first glance, this outcome contradicts the aforementioned low assessment of personal account loss probability. Nevertheless, these datasets complement each other: they indicate that newsrooms recognize the vulnerability of the broader media ecosystem to digital platforms, yet they fail to project this threat onto their own situations, particularly in the absence of prior experience with severe sanctions.

BLOCK 06

INTERACTION WITH OTHER MEDIA OUTLETS

The objective of this block is to evaluate the feasibility of establishing media coalitions and alliances to lobby for collective interests with digital platforms, as well as to understand the existing peer-to-peer knowledge-sharing processes among newsrooms.

INTER-MEDIA COOPERATION

Focus group discussions revealed that a formal, structured dialogue regarding platform-induced pressure does not exist among editorial boards. This lack of discussion is attributed to a deficit of time and resources, alongside a reluctance to “reveal operational vulnerabilities.” Inter-editorial contact regarding bans occurs primarily at the level of technical specialists, serving as an ad-hoc troubleshooting mechanism to lift restrictions. Conversely, informal meetings among media editors are predominantly dedicated to monetization strategies, reach expansion, and other commercial objectives. Account bans are perceived as isolated, individual challenges. This dynamic, in turn, contributes to the normalization of platform-driven pressure.

“No one discusses it anywhere. On the contrary, people worry they might accidentally reveal their secrets.”

“During meetings, we focus on brainstorming new formats – what we can implement so we don’t end up at the back of the train.”

“We don’t discuss major structural problems. However, regarding reach and formats, we began discussing these with [XX] at the end of last year; we have been filming and collaborating for three months now, discussing how to better engage the audience and what formats we can test.”

When asked whether they exchange experiences with other newsrooms on how to navigate sanctions or platform issues, the majority of survey respondents (62.5%) noted that such knowledge sharing occurs rarely, 31.3% stated it happens occasionally, and only 6.3% indicated that they never interact with other newsrooms on these matters.

In instances where knowledge sharing does take place, it focuses on resolving highly specific operational issues: account bans and hacks, the underlying causes of sanctions, declines in reach, shadowbans, algorithmic shifts, and the technical aspects of platform interaction, including extracting a response from customer support. Concurrently, the lack of regular information exchange is attributed to time and resource constraints or “healthy competition.”

COLLECTIVE MECHANISMS AS A KNOWLEDGE-SHARING PLATFORM

Focus group dynamics demonstrated divided perspectives among participants: a portion expressed support for a potential collective mechanism to interact with platforms, whereas others remained skeptical regarding the tangible efficacy of such an initiative. In the skeptics’ view, local alliances are unlikely to exert substantial leverage over the decisions of global digital monopolies. Furthermore, it was posited that such a mechanism might achieve greater efficacy if it integrated not only media outlets but also international organizations capable of exerting systemic pressure on platforms.

“For instance, it is one thing for a single outlet to write an appeal, but it is completely different if genuinely registered media outlets write together. They won’t just ignore that.”

"[Meta] is such an unwieldy mechanism. You can get through to absolutely anyone except these social networks. [...] So we decide to create an alliance. So what? It makes no difference to Meta; they couldn't care less."

"I think it makes sense purely for knowledge sharing. If someone encounters an issue, they can share their problems; however, for an actual dialogue with the platform, a collective mechanism is irrelevant. You have the state on one side, and then just some users on the other. It feels like we are simply powerless."

"It would be a good idea if it were established at a Central Asian regional level – meaning focusing on quality rather than just scale. Because, it seems to me, very few people know about Kyrgyzstan [...] but if you say 'Central Asia,' they might actually pay attention [...]. Moreover, Uzbekistan and Kazakhstan currently have greater leverage to break through these kinds of issues."

Participants displayed a more positive disposition toward the concept of a collective mechanism if it functioned as a platform for psychological support, peer-to-peer learning, and the exchange of operational insights regarding algorithmic performance.

"This coalition would likely serve as mutual psychological support in cases where certain events occur related to algorithms or platforms."

"I think there is a necessity for this, because it doesn't commit you to anything anyway, but in a best-case scenario, it still facilitates information exchange."

Despite the limited level of current inter-editorial interaction detailed in the Inter-Media Cooperation subsection, the survey results point to a clear demand for collective frameworks for dialogue with platforms. Half of the respondents (50%) are prepared to consider participating in such formats, an additional 43.8% expressed direct interest, and only 6.2% opposed the idea.

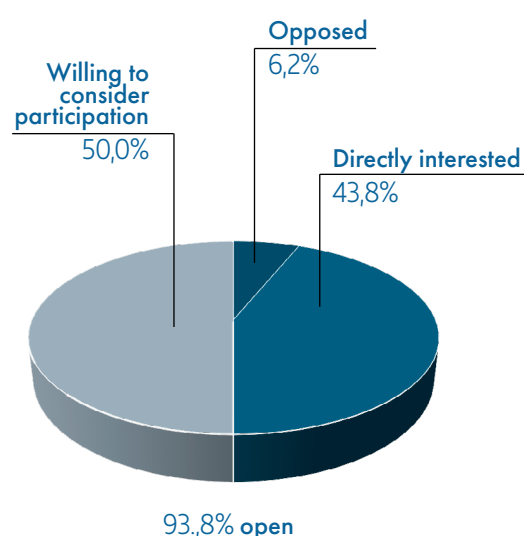


Figure 15. **Willingness of Newsrooms to Participate in a Collective Framework for Dialogue with Platforms** (n = 16)

"It is essential to convey certain things that customer support is unaware of and handles poorly. And it is always better to be just a few handshakes closer to Zuckerberg."

"I think such discussions are useful because they allow us to learn about the experiences and approaches of other newsrooms."

"The probability that platforms will engage in an effective dialogue is extremely low. However, alliances can be useful for knowledge sharing."

Participants view these frameworks as mechanisms for lobbying for their interests and communicating with platform support services, which could help achieve more transparent decisions from the platforms. Respondents also emphasized the significance of a collective mechanism for protecting the interests of regional media outlets and elevating local issues to a higher level.

"A collective dialogue (an alliance or coalition) provides an opportunity to unite media voices, amplifies leverage over platforms, and helps achieve transparent and fair decisions."

"Jointly, we can file a complaint and actually get a response."

"Perhaps within such a dialogue, it would be possible to negotiate more mutually beneficial terms."

ANALYSIS OF BLOCK 6

The focus group and survey results reveal a complete absence of formal interaction mechanisms among media outlets regarding platform-induced pressure. This deficit is driven by constraints on time and resources, a competitive environment, and a reluctance to expose operational vulnerabilities to industry peers. Collectively, these factors reinforce the perception that bans and sanctions are isolated, individual challenges rather than a shared industry issue.

Despite skepticism regarding the practical efficacy of a collective mechanism, there is an evident demand for structured discussions of these problems and mutual support. However, their ultimate success hinges on the ability of editorial boards to reframe blocking issues as a systemic threat affecting all media without exception, rather than isolated newsrooms, alongside a willingness to stop viewing platform penalties through the lens of audience competition.

BLOCK 07

EDITORIAL AGENCY

This block examines the degree of control that media outlets possess over the digital environment in which they operate, and aims to understand how newsrooms view the issue of platform regulation.

MEDIA-PLATFORM INTERACTION

Focus group discussions demonstrated that the capacity of editorial boards to influence the decisions of digital platforms is profoundly limited. While participants cited isolated examples of unfair decisions being reversed (e.g., the lifting of specific bans), these instances were not perceived as systemic practice.

This sentiment is corroborated by the survey results: half of the respondents (50%) noted that their newsroom has virtually no ability to influence platform rules, an additional 31.2% indicated limited capacity for influence, and 18.8% stated that such capacity is entirely non-existent.

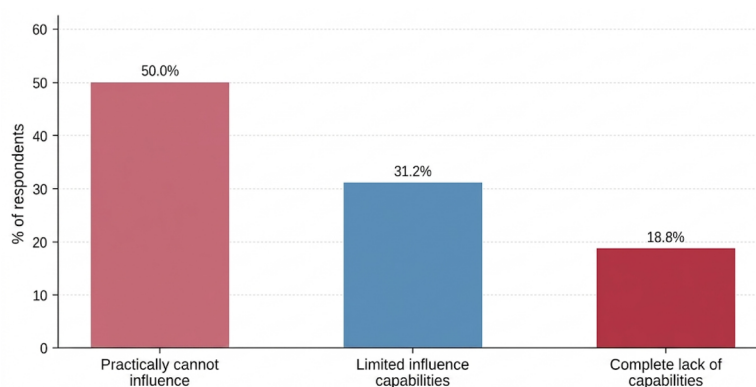


Figure 16. Editorial offices ability to influence platform rules and decisions (n = 16).

Responses to the open-ended questions in the survey indicate that this perception of helplessness is driven by several distinct factors:

- The limited resources of regional media outlets and the power asymmetry between global platforms and newsrooms, particularly those operating in smaller countries;
- A fundamental lack of understanding by global platforms regarding the local context of Kyrgyzstan (including language, political nuances, etc.);
- The utter opacity of content moderation decisions made by platforms;
- The absence of direct channels of communication with platform moderators.

"As a result, media interaction with platforms is a matter of reaction and adaptation rather than actual influence."

PERCEPTION OF PLATFORM REGULATION

Focus group participants were unanimously opposed to platform regulation, particularly if the state acts as the regulator. State regulation is perceived as a direct threat to media outlets because it is associated with increased pressure and surveillance. Specifically, participants noted that under state regulation, platforms would be required to open local representative offices. In the view of media representatives, this would allow authorities to interfere more aggressively in their operations. Furthermore, participants emphasized that passing local legislation is an ineffective tool, as such laws carry no weight or significance for transnational corporations.

"I don't trust anyone; I am generally against any form of regulation."

"Regulation by anyone is probably highly detrimental to independent media in any scenario, and that includes regulation by the state."

"We probably can't even draft or develop our own laws — they wouldn't be able to influence anything anyway."

"In that scenario, the state forces them to open a local representative office. And that is already a risk, so to speak. Having a physical presence here creates an additional liability, plus it provides another tool for pressure."

The drivers behind this perception are heavily linked to the current political context. According to the participants, within an environment characterized by a weak judiciary and arbitrary law enforcement, regulation is viewed as a tool directed "against us." In a context where the work of journalists is monitored "practically every second" "from the air and the ground," any form of state-driven regulation is perceived as a threat. This sentiment is compounded by a lack of trust in platforms as commercial entities pursuing "their own agendas."

"We are already over-regulated. We live in an authoritarian country with an unfair judiciary, arbitrary legal interpretations, and unjust law enforcement practices. This means we know exactly how it will be weaponized against us."

"That is to say, we might let people into our accounts now, and they might help us today, but after a while, they could just turn around and use that information against us. So, there is genuinely no trust."

"We understand that at the end of the day, these digital platforms are owned by businessmen, and they pursue their own goals. Therefore, it's not as if we trust them 100%."

Consequently, a situation emerges where media outlets — despite their acute awareness of their own vulnerability vis-à-vis platforms — do not see a safe regulator to whom they could entrust the protection of their interests. This further entrenches the newsrooms' orientation toward mere adaptation and likely exacerbates the existing power asymmetry.

WHAT COULD RESTORE A SENSE OF CONTROL

Against this backdrop, focus group participants and survey respondents agree that restoring editorial agency depends not on external regulation, but on a shift in the practices of the platforms themselves. This includes predictable algorithm updates, transparent decision-making mechanisms regarding bans and sanctions, the possibility of "direct interaction" with support services, enhanced platform efforts to counter fake reporting and troll attacks, and functional appeal mechanisms for penalties.

The deficit of these elements and the general opacity of platform actions breed a sense of helplessness, stress, and total dependence on platform decisions.

Some participants also voiced the need to introduce a “gradation” of accounts, which would create a special category for verified media accounts governed by more proactive troubleshooting protocols.

“The opportunity for genuine direct interaction – which, of course, won’t actually happen with the platform. I mean communicating with a human being, just like on WhatsApp.”

“Predictability, and a stronger effort by the platform to counter fraudulent reports, unsubstantiated complaints, and troll factories, so that duplicate accounts get banned.”

“More transparent terms of service – meaning clearer, predictable algorithm updates [...] transparent sanctions and sanctioning mechanisms.”

“Well, it seems to me that if there were a functional appeal process – meaning one where you don’t have to go through several circles of hell, but where it can be done normally – that would change things.”

“Perhaps if they made some sort of exception, a gradation of accounts – meaning when you have a [...] media account, different rules and different capabilities apply to it.”

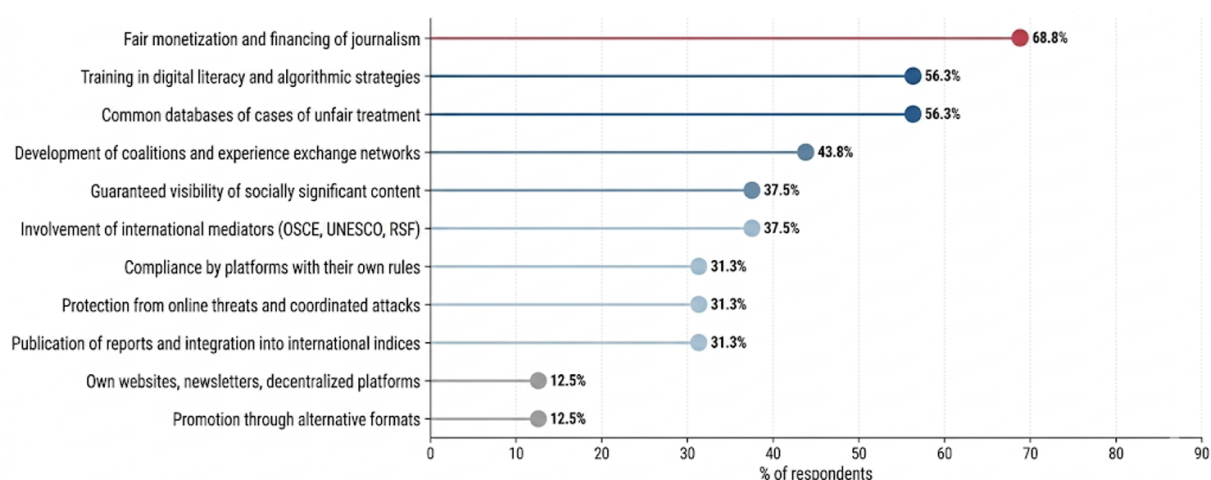


Figure 17. **Factors Capable of Restoring a Sense of Control Among Newsrooms**
(n = 16, multiple responses allowed).

The survey results complement this picture, demonstrating that a sense of control is also directly tied to factors such as¹¹⁷:

- Fair monetization and financing for journalism (68.8%);
- Training newsrooms in digital literacy and algorithmic strategies (56.3%);
- Creating shared databases documenting instances of unfair treatment by platforms (56.3%);
- Developing coalitions and networks for knowledge sharing (43.8%);
- Involving international intermediaries (such as the OSCE, UNESCO, RSF, etc.) (37.5%).

¹¹⁷ When answering this question, respondents could select multiple options.

The following factors were also highlighted as important:

- Guaranteed visibility for socially significant content (37.5%);
- Compliance by platforms with their own rules alongside the availability of effective appeal mechanisms (31.3%);
- Protection against online threats and coordinated attacks (31.3%);
- Publishing reports and integrating data into international media freedom indices (31.3%);
- Utilizing proprietary websites, newsletters, mirror sites, and decentralized platforms (12.5%);
- Promoting content through alternative formats (12.5%).

PERCEPTION OF INTERNATIONAL REGULATORY MECHANISMS

The assessment regarding the applicability of international approaches to platform regulation (specifically models implemented within the European Union) revealed a sense of cautious optimism.

More than half of the respondents (56.3%) believe that such approaches could be adapted in Kyrgyzstan. At the same time, 31.3% note that despite the transparency and fairness of these models, their practical implementation within the local context remains problematic.

An equal share of respondents (6.3% each) either consider such approaches fundamentally inapplicable or found it difficult to answer, while 12.5% express distrust toward local regulatory initiatives, pointing to the restricted authority of national bodies vis-à-vis global platforms.

Thus, international regulatory models are perceived as potentially more effective and fair; however, their adaptation necessitates careful consideration of the domestic political context, including the level of public trust in state institution.

ANALYSIS OF BLOCK 7

The focus group and survey results demonstrate that the sense of editorial agency among newsrooms in their interactions with digital platforms is remarkably low. Participants lack the capacity to influence platform policies and consequently view their relationships with platforms as fundamentally asymmetric. Under these conditions, the primary operational strategy becomes adaptation to platform rules rather than any attempt to alter them.

The focus group and survey also revealed deep-seated distrust toward any form of platform regulation, particularly when the state assumes the role of the regulator. This perception of regulation as a direct threat is explicitly linked to the current political context in Kyrgyzstan. Furthermore, participant responses indicate that a sense of control can be restored to newsrooms not through external regulation, but via structural changes in how platforms operate — such as algorithmic predictability, transparency, and functional appeal mechanisms for platform decisions.

Discussion

The research findings allow us to view the digital dependence of newsrooms as a regime of structural vulnerability. This regime is shaped at the intersection of algorithmic management, institutional uncertainty, and the limited agency of media outlets. Taken together, the data across all thematic blocks indicate that the interaction between newsrooms and digital platforms does not develop as a formalized system of rules. Instead, it evolves as a continuously adapting practice rooted in personal and inconsistent experiences with sanctions, informal conflict resolution mechanisms, and the forecasting of algorithmic decisions — often guided by word-of-mouth.

First, at the organizational level, newsrooms are gradually institutionalizing the platform interaction function, yet it remains hybrid and under-defined. It simultaneously encompasses technical, editorial, and strategic dimensions, signaling a blurring of the traditional divide between content distribution and content production. Furthermore, the rules governing platform interaction are not shaped by a stable regulatory framework, but rather as a reaction to a volatile and situational experience within the platform ecosystem.

Second, the experience of sanctions and appeal procedures demonstrates a persistent asymmetry in access to due process. Appeal procedures are perceived as protracted, opaque, and unpredictable, with their efficacy frequently contingent upon informal factors, such as personal contacts or the mediation of external actors. This points to a partial de-institutionalization of media defense mechanisms in the digital environment, where formal procedures are supplemented or replaced by informal channels of communication.

Third, the identified practices of algorithmic adaptation demonstrate that platform influence extends far beyond direct sanctions. Newsrooms preemptively adjust content, avoid potentially risky topics, and adapt to perceived algorithmic requirements, thereby establishing a model of “anticipatory behavior.” This implies that platform influence manifests not only through direct moderation but also through the anticipation of sanctions. This anticipation becomes an independent factor in editorial policy, which not only shapes public discourse but also reinforces self-censorship tendencies.

Fourth, the perception of platform dependence is characterized by a combination of high-risk awareness and a limited sense of control. The intertwining of platform-related and domestic political risks amplifies the overall uncertainty and stress under which newsrooms operate. Meanwhile, the discrepancy between emotional and rational risk assessments indicates a heterogeneity in threat perception: while threats are recognized as systemic, their specific probability regarding a newsroom's own organization is often underestimated — a phenomenon that can be interpreted as a form of cognitive self-defense.

Fifth, newsrooms' response strategies are predominantly adaptive. This reflects not a lack of strategic planning, but rather the conditions of high uncertainty and resource constraints under which media outlets operate. In this environment, while a multi-platform approach serves as a strategy for risk diversification and resilience building, it also demands substantial organizational and time resources due to varying formats and the need to maintain engagement across different platforms.

Sixth, the absence of horizontal coordination mechanisms among newsrooms reinforces the individualization of experiences regarding platform pressure. Blocks and sanctions are perceived as isolated problems of individual newsrooms rather than as a systemic phenomenon. Although there is a demand for collective response frameworks, they are perceived as largely ineffective due to the fragmented nature of the media environment and the lack of institutionalized coordination mechanisms.

Finally, the research results demonstrate a low level of newsroom agency in relations with platforms. Newsrooms perceive their interaction with digital platforms as asymmetric and highly resistant to influence, which reinforces a strategy of adaptation over a strategy of transforming the rules. The demand for regulation is primarily directed toward platforms — specifically regarding increased transparency, predictability, and effective appeal mechanisms — juxtaposed with a low level of trust in state-led forms of regulation.

In conclusion, the study demonstrates that the digital dependence of newsrooms is established as a sustained regime of structural vulnerability. This regime is predicated on algorithmic uncertainty and the institutional power asymmetry of digital platforms, within which media agency remains limited and predominantly adaptive.

Recommendations

RECOMMENDATIONS TO THE JOGORKU KENESH OF THE KYRGYZ REPUBLIC

- To initiate a comprehensive review of the legislation of the Kyrgyz Republic in the sphere of regulating freedom of expression and information — including the laws of the Kyrgyz Republic on freedom of speech and freedom of the media — with the objective of bringing it into full compliance with the international human rights obligations of the Kyrgyz Republic.
- To consider revising the Law of the Kyrgyz Republic “On Protection against Inaccurate (False) Information” in light of its impact on freedom of expression, media operations, and legal certainty, including the possibility of its repeal or substantial redrafting to introduce judicial guarantees for the protection of rights.
- To amend Articles 13 and 14 of the Digital Code of the Kyrgyz Republic, which govern the procedure for restricting access to internet resources and digital platforms, by establishing a mandatory judicial procedure for decision-making, alongside strict criteria for the legality, necessity, and proportionality of such restrictions.
- To conduct a parliamentary evaluation of enforcement practices regarding Articles 330 and 278 (3) of the Criminal Code of the Kyrgyz Republic concerning their impact on the exercise of the constitutional right to freedom of expression and public criticism by journalists, bloggers, and social media users, including cases of criminal liability for digital speech and the risks of restricting freedom of speech through overbroad interpretations of these statutes.
- To establish a standing advisory mechanism under the Jogorku Kenesh of the Kyrgyz Republic, integrating representatives from the media, civil society, academia, and digital technology experts, to assess the impact of domestic legislation on freedom of expression and media pluralism.
- In the context of the potential regulation of very large online platforms, the Jogorku Kenesh should proceed from the necessity of ensuring institutional guarantees for the protection of rights in the digital environment. This includes the independence of any authorized bodies involved in regulation, the presence of effective mechanisms for external public and parliamentary oversight over their activities, the transparency of decision-making procedures, as well as a guaranteed possibility of judicial review of such decisions to prevent arbitrary or disproportionate restrictions on rights in the digital environment.
- To explore the legislative institutionalization of mandatory socio-economic impact assessments prior to enacting decisions that restrict access to digital platforms and online services, including evaluations of their impact on user rights, employment, entrepreneurship, the creative economy, and overall access to information.
- To ensure the proper application of existing legislation of the Kyrgyz Republic regarding mandatory parliamentary hearings on draft regulatory legal acts that impact the constitutional rights and freedoms of citizens — including legislation governing non-profit organizations and the mass media — and to consider extending this practice to the regulation of emerging digital technologies and the online environment to enhance transparency and public participation in the legislative process.

- To incorporate legal guarantees within national legislation ensuring non-discriminatory access for small, regional, and independent media outlets to state support measures in the fields of information and digital policy, utilizing transparent resource allocation procedures grounded in clear, objective criteria.

RECOMMENDATIONS TO THE CABINET OF MINISTERS OF THE KYRGYZ REPUBLIC

- To ensure the implementation of constitutional guarantees regarding freedom of expression, freedom of the media, and the right of access to information when formulating and executing state policy in the informational and digital spheres, including subordinate and administrative regulation.
- To review the practice of employing extrajudicial mechanisms to restrict access to information in the digital environment, ensuring that priority is given to judicial review as the primary form of authorizing restrictive measures, or establishing a mandatory channel for independent and effective judicial appeal of such decisions.
- To strictly prevent the application of criminal and administrative measures that could lead to the unsubstantiated restriction of the right to freedom of expression, including public criticism, journalistic activities, and participation in public discourse, and to conduct an analysis of enforcement practices under relevant statutes for risks of arbitrary application.
- It is recommended to restore the section dedicated to freedom of expression and freedom of assembly within the Human Rights Action Plan for 2025–2027, in light of its omission from the current edition, in order to maintain continuity in human rights policy and fulfill the international obligations of the Kyrgyz Republic. Following this, it is recommended to ensure the implementation of Clause 99 of the Human Rights Action Plan for 2022–2024 (approved by Order of the Cabinet of Ministers of the Kyrgyz Republic dated November 28, 2022, No. 655-r), which mandates the preparation of proposals to amend the Criminal Code of the Kyrgyz Republic, including the recalibration of Article 330 to clarify the elements of the offense and align it with the recommendations of the UN Universal Periodic Review.
- To conduct a comprehensive audit of subordinate legislation and departmental procedures within the information and communications sectors to verify their compliance with constitutional guarantees of human rights and freedoms, as well as the international obligations of the Kyrgyz Republic.
- To ensure a comprehensive impact assessment of law enforcement practices regarding legislation that impacts freedom of expression, access to information, and media operations, including an analysis of its influence on media pluralism, the legal certainty of statutes, and the sustainability of citizens' digital rights.
- To develop a national training program for civil servants and the legislature addressing the operations of digital platforms, algorithmic recommendation systems, content moderation, and users' digital rights.
- To mandate preliminary impact assessments for draft regulatory and administrative decisions in the areas of digital platforms and cybersecurity concerning their effects on citizens' rights and freedoms, specifically freedom of expression and access to information.
- To ensure the establishment and functioning of permanent communication forums, alongside the institutionalization of transparent mechanisms for cross-sectoral interaction among state agencies, digital platforms, mass media, and civil society organizations regarding digital governance.

- To ensure equal, transparent, and non-discriminatory access for media outlets to state advertising resources and the advertising budgets of state-owned enterprises, including the establishment of clear allocation criteria and rigorous accountability procedures.
- To design and deploy sustainability measures to support independent, regional, and small-scale media outlets, including the advancement of their institutional and digital capacity.
- To develop national programs aimed at increasing public digital and media literacy, including educating citizens on the core operating principles of digital platforms, algorithmic moderation, data privacy mechanisms, and user rights in the digital sphere.
- To establish support mechanisms for the creation of educational and instructional content tailored for children and adolescents in both the Kyrgyz and Russian languages, specifically focusing on language learning, science, technology, digital literacy, and computer programming.
- To design support measures for accessible extracurricular educational, creative, and athletic programs for children and adolescents as an active intervention tool to mitigate problematic and excessive digital content consumption.
- To develop inter-agency programs centered on advancing critical thinking, digital literacy, and media competence among children, adolescents, and parents, incorporating active participation from the Ministry of Culture, Information, Sports and Youth Policy, the Ministry of Education and Science, the media community, and civil society organizations.
- To conduct robust research into the digital practices of minor users— encompassing content consumption patterns, digital behavior, and online risks — in order to formulate evidence-based policy in the sphere of child online protection.
- To expand programs that foster the safe and conscious use of digital platforms, including parental control tools, age-appropriate content labeling, and user education regarding the customization of algorithmic recommendations.
- To systematically account for the socio-economic value of digital platforms to small businesses, content creators, and independent media when deciding whether to enact measures that restrict access to platforms and digital services.

RECOMMENDATIONS TO THE MEDIA

- To develop and institutionalize internal guidelines within the newsroom for social media operations (TikTok, Instagram, Facebook, etc.), explicitly outlining standard operating procedures to avoid content suppression and steps to take in the event of a ban.
- To appoint a designated staff member responsible for publishing content across platforms, monitoring algorithmic sanctions, managing the appeal process, and troubleshooting critical incidents.
- To deploy a comprehensive crisis-management plan in the event of an account suspension, establishing immediate protocols for the first 24–72 hours, the specific steps for filing appeals, audience notification strategies, traffic redirection to alternative hubs, and the redistribution of internal staff duties during a crisis.
- To mitigate financial dependence on social media channels by aggressively diversifying revenue streams,

which includes expanding standalone websites, messaging apps, and subscription models that operate independently of global platform algorithms.

- To maintain pre-configured backup channels on identical platforms, alongside proprietary websites, email newsletters, and alternative distribution outlets.
- To establish an informal or semi-formal peer network for knowledge sharing regarding platform mechanics, designed to facilitate mutual assistance, rapid communication regarding policy updates, case-study analysis, and psychological support.
- To rigorously document all instances of content takedowns, copyright/community strikes, shadowbans, fraudulent complaints, and successful or failed appeals, thereby converting individual experiences into cumulative institutional knowledge.
- To prioritize the psychological resilience of staff members, particularly those working on the front lines of comment moderation, complaint handling, user trolling, and account sanctions.
- To conduct regular public awareness campaigns for parents and minor users, explaining practical methodologies for managing algorithmic recommendations, configuring account privacy settings, enforcing screen-time limits, and utilizing parental control mechanisms.
- To produce specialized educational content on digital and media literacy tailored for diverse target groups, including parents, adolescents, and young social media consumers.
- To develop partnerships with educational institutions, academic researchers, and civil society organizations to develop localized, specialized media literacy formats optimized for youth audiences.

RECOMMENDATION TO CIVIL SOCIETY

- To conduct systematic monitoring of legislation and enforcement practices in the fields of freedom of expression, access to information, and media operations, including the documentation of instances involving potential restrictions on the rights of journalists, bloggers, and social media users.
- To develop independent mechanisms for documenting cases of pressure on the media and civil activists, including the systematic collection of data on law enforcement procedures and cases related to the dissemination of information and expression of opinion, including under criminal law, offense legislation, and civil lawsuits for the protection of honor and dignity.
- To actively participate in public, expert, and parliamentary debates concerning draft regulatory frameworks within the information sector, digital environment, and online content management, including the preparation of independent legal evaluations and policy briefs.
- To champion standards of freedom of expression and media pluralism through strategic public communication, educational initiatives, and expert forums targeted at diverse social demographics and regional communities.
- To foster coalition-building and strategic alliances among non-profit organizations, media outlets, private enterprise, the technology sector, and academia to formulate consensus-based positions on pivotal issues of digital governance, freedom of expression, and media freedom.
- To facilitate multi-stakeholder dialogue connecting digital platforms, state authorities, the media com-

munity, and end-users on matters concerning localized content moderation, linguistic specificities, and platform appeal protocols.

- To provide strategic legal counsel and expert defense support to journalists, bloggers, and social media users facing administrative or criminal prosecution linked to their professional activities or expression of opinion.
- To conduct independent research on the impact of digital monopolies, examining how algorithmic content distribution mechanisms and advertising market dynamics affect the sustainability of independent media and public access to information.
- To execute comprehensive behavioral studies on the digital footprints of minors, adolescents, and parents, capturing risk perceptions, content consumption habits, and the baseline comprehension levels of platform recommendation engines.
- To design and implement public awareness initiatives regarding reporting mechanisms for illegal content, standard procedures for challenging platform actions, and the risks associated with the proliferation of disinformation within the digital ecosystem.
- To implement specialized literacy programs for parents and educators, aimed at demystifying the operational architectures of social platforms, recommendation algorithms, and fundamental digital security tools.
- To generate alternative, high-quality public-interest content and data analytics, serving to mitigate information asymmetry and elevate operational transparency in digital policy processes.
- To scale public media and digital literacy frameworks, with a core focus on user understanding of platform functions, user rights, and baseline information security tenets.
- To actively engage with international networks and global civil society coalitions dedicated to freedom of expression, digital rights, and journalist protection, thereby optimizing knowledge sharing and scaling local advocacy leverage.
- To mobilize dedicated legal teams and policy consultants to establish a specialized expert pool, capable of providing rapid-response intervention and strategic support to media outlets during complex content moderation and compliance disputes.

RECOMMENDATIONS TO DONORS AND INTERNATIONAL ORGANIZATIONS SUPPORTING THE MEDIA

- To provide practical support to newsrooms in developing internal guidelines for social media operations, including a clear distribution of roles and responsibilities among staff members involved in content publishing, moderation, monitoring sanctions, and filing appeals related to content bans.
- To organize training workshops and practical sessions for newsrooms on preventing professional burn-out and mitigating stress levels associated with platform pressure, online trolling, and the perpetual risk of account bans.
- To support training initiatives for newsrooms focused on diversifying revenue streams in order to reduce their financial dependence on audience reach, advertising revenue, and monetization models native to social platforms.

- To facilitate the creation or support of existing forums¹¹⁸ for knowledge sharing among editors and representatives of various media outlets, where participants can analyze changes in platform policies, share successful and unsuccessful case studies of appealing bans, design collective strategies, and offer peer-to-peer professional support.
- To support the development of baseline crisis-management protocols tailored for scenarios involving account bans, content takedowns, or prolonged algorithmic suppression of reach.
- To facilitate the systematic collection and documentation of cases involving platform bans and sanctions to leverage this data in future advocacy campaigns and structured dialogues with digital platforms.
- To elevate to the international level the critical need for more transparent moderation rules, comprehensive explanations of platform sanctions, effective appeal frameworks, and specialized protocols for verified media accounts.
- To explore the possibility of acting as intermediaries in communication between independent media outlets and digital platforms regarding the most complex and recurring instances of content and account bans.
- To support the development and implementation of measures to counter risks associated with the proliferation of deepfakes and synthetic content as one of the priority areas of digital security.
- To promote the development of sustainable mechanisms for cooperation between government agencies, digital platforms, mass media, and civil society organizations on countering disinformation, look-alike accounts, fraudulent schemes, copyright infringements, and other forms of digital harm.
- To support media and digital literacy programs for representatives of government press offices, including issues of information verification and countering disinformation and deepfakes.
- To support initiatives aimed at increasing the visibility of journalistic content and information of public interest in the digital environment, including the development of transparent and non-discriminatory mechanisms for identifying and prioritizing verified media sources on digital platforms, provided there are guarantees for media freedom, transparent moderation procedures, and effective mechanisms for appealing platform decisions.
- To support long-term media literacy and critical thinking initiatives tailored not only for youth but also for parents, educators, and regional communities.
- To support comprehensive research into the digital practices of minor users and the broader impact of platform recommendation algorithms on access to information and media consumption habits.
- To promote the advancement of expert dialogue among state authorities, digital platforms, and civil society organizations concerning digital governance and the protection of user rights.
- To support initiatives aimed at developing localized expertise in matters of algorithmic moderation, platform governance, and digital rights.

118 The Coalition for Content Moderation and Freedom of Expression in the Kyrgyz Republic “Aykyn Sanarit” was officially established on April 10, 2026, in Bishkek through the signing of the relevant Declaration, guided by the outcomes of the 2025–2026 consultation process within the framework of the UNESCO project “Social Media for Peace” (Social Media 4 Peace), funded by the European Union. The Coalition is an independent, multistakeholder platform that brings together representatives of civil society, the media, and the expert and academic communities. It operates as a self-regulated forum without legal entity status and aims to promote a safe, sustainable, and open digital environment in the Kyrgyz Republic. Its activities cover content moderation, digital safety, freedom of expression, and the responsible use of artificial intelligence. UNESCO. (2026, April). *The “Aykyn Sanarit” Coalition in Kyrgyzstan to Counter Online Hate Speech and Misinformation*. Accessed on May 22, 2026, <https://www.unesco.org/ru/articles/koaliciya-aykyn-sanarip-v-kyrgyzstane-budet-protivodeystvovat-yazyku-nenavisti-i-dezinformacii-v>.

RECOMMENDATIONS TO DIGITAL PLATFORMS

- To establish a distinct category for verified media accounts and ensure it provides access to expedited communication with the technical support system, alongside accelerated procedures for appealing sanctions and reviewing complaints regarding fake and troll attacks.
- To develop mechanisms that enhance the visibility of socially significant content, including through dedicated labels on their platforms or tools that allow media outlets to direct audiences to their proprietary websites without experiencing a reduction in reach.
- To ensure the predictability and transparency of algorithmic decisions, in part by providing regular, accessible, and comprehensive updates to media organizations regarding algorithmic modifications.
- To ensure fair and transparent monetization frameworks, including conditions under which monetization adjustments in neighboring states (such as the Russian Federation) do not result in an automatic reduction of revenue or reach for Kyrgyz media outlets.
- To recalibrate targeting algorithms to ensure they apply equitably to Kyrgyz-language content and prevent the automatic redirection of users into the “Russian-language segment,” thereby avoiding the marginalization of the Kyrgyz language.
- To conduct regular webinars and consultations for media professionals in both the Russian and Kyrgyz languages — specifically targeting small and regional newsrooms — focusing on methodologies for optimizing content monetization on digital platforms, as well as on platform rules, with a particular emphasis on appeal procedures.
- To ensure the transparency of platform-driven decisions by publishing localized impact reports assessing how operational changes affect small and regional markets, thereby enabling media outlets to systematically plan their content strategy and revenue models.

Appendix 1

During a training workshop conducted in late March and early April 2026 by the Public Foundation “Media Policy Institute” under a UNESCO project¹¹⁹ — dedicated to freedom of expression, content moderation, and collective approaches to digital platform regulation with the participation of media and NGO experts — participants outlined a complex set of digital and economic constraints affecting their sustainability and audience access.

A core challenge identified by participants was their dependence on the algorithms of social platforms, which effectively dictate traffic distribution and content visibility. As a result, migrating audiences from platforms (specifically YouTube) to media outlets’ proprietary websites has become increasingly difficult. According to several experts, this occurs because algorithms tend to suppress the reach of posts that contain external links. Ultimately, this diminishes the role of standalone media websites, intensifies reliance on social networks as primary distribution channels, and leads to a partial loss of editorial autonomy over content dissemination. Consequently, core traffic remains concentrated within the platforms, while proprietary media websites are gradually relegated to a primarily archival function.

The issue of content monetization on YouTube was raised as a distinct concern during the workshop. In 2022, following the outbreak of the full-scale war in Ukraine, an official statement from YouTube announced the suspension of all advertising on the platform and via Google for users inside Russia. Furthermore, the company disabled all monetization-related features for Russian users, including merch sales, channel memberships, Super Chats, and Super Stickers. As a result, Russian creators temporarily lost the ability to generate revenue from ad impressions and other paid features on the platform.¹²⁰

Although the company explicitly noted in its statement that these changes would not affect users and creators in other countries, some workshop participants stated that these shifts did impact certain creators and media outlets in Kyrgyzstan. In expert discussions, participants observed a prevailing perception that, within the logic of the platform economy and monetization, Kyrgyzstan is treated by global platforms as part of a broader post-Soviet or “Russian” digital market. In their view, this outlook negatively affects the allocation of advertising opportunities and access to monetization tools.

119 Д A two-day training in Bishkek and Osh dedicated to freedom of expression, content moderation, and collective approaches to the regulation of digital platforms, featuring the participation of media and NGO experts within the framework of the UNESCO project “Social Media for Peace” (Social Media 4 Peace), funded by the European Union. Media Policy Institute. (2026, April). Accessed on May 22, 2026., <https://media.kg/news/v-bishkeke-i-oshe-proshli-treningi-po-teme-svoboda-vyrazheniya-moderatsiya-kontenta-i-kollektivnye-podhody-k-regulirovaniyu-cifrovyyh-platform/>.

120 YouTube. (2026). Updates to YouTube Terms of Service and Community Guidelines. Accessed on May 22, 2026., https://support.google.com/youtube/answer/10008196?sjid=7786540589472754564-EU#tos,cg_cg_2025,cg_cg_2024,cg_cg_2023,cg_cg_2022,cg_cg_2021,cg_cg_2020,ypp,ypp_2025,ypp_2024,ypp_2023,ypp_2022,ypp_2021,ypp_2020,afg,copyright,product_feature,product_feature_2025,product_feature_2024,product_feature_2023,product_feature_2022,product_feature_2021,product_feature_2020.

Given the absence of local platform representation, limited support channels, and hindered access to clarifications from the platform itself, the subjective perceptions of the workshop participants take on significant weight. Moreover, this perception aligns with the targeting principles of the Google Ads system, where advertising is distributed primarily based on users' language parameters, thereby reinforcing language-based segmentation within the digital advertising space.¹²¹ Concurrently, platform support services maintain that ad targeting factors in the user's geographic location (including via IP addresses), meaning users in different countries see different advertisements—a mechanism designed, in the platform's logic, to increase ad relevance for specific audiences.¹²²

In this context, it is crucial to examine how linguistic and regional segmentation manifests not only in advertising mechanisms but also in the algorithms that determine content distribution and visibility on the platform. A report by WIRED, based on a study¹²³ that simulated user behavior on YouTube, demonstrated that even when users specifically selected Kyrgyz-language content, the recommendation system consistently and predominantly suggested Russian-language videos. This trend is particularly pronounced in the children's and mass entertainment segments, where the Kyrgyz language is systematically underrepresented in search results and recommendations. This structure of recommendations effectively builds a digital environment where the Russian language becomes the default within the region's platform ecosystem, while the Kyrgyz language remains peripheral and less algorithmically boosted.

Consequently, under the influence of these algorithms, the actual distribution of content and audiences drives a deep asymmetry in linguistic visibility within the platform environment. As a result, Kyrgyz-language content becomes less visible and algorithmically less distributed compared to the Russian-language segment. This imbalance, in turn, skews the allocation of views, ad impressions, and monetization opportunities in favor of the dominant linguistic segment.

¹²¹ *How to Exclude Ads from Specific Geographic Locations*. Accessed on May 22, 2026, <https://support.google.com/google-ads/answer/1722040>.

¹²² *Do Users in Different Countries See the Same Ads?* Accessed on May 22, 2026. <https://support.google.com/adSense/answer/9720>

¹²³ WIRED. (2026, May). *This Indigenous Language Survived Russian Occupation. Can It Survive YouTube?* Accessed on May 22, 2026, <https://www.wired.com/story/youtube-promote-russian-language-kyrgyzstan/>.

Acknowledgments

The authors wish to express their sincere gratitude to the team of the **Public Foundation “Media Policy Institute,”** specifically **M. Gainazarova, A. Isaeva, and A. Eshenalieva,** for their invaluable contribution to the preparation of this report.

