The European Democracy Shield and Its Whole-of-Society Approach

From the Bottom-Up, but Short on Concrete Action

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On 12 November, the European Commission published the long-awaited European Democracy Shield (EDS). Announced as one of the Commission's flagship initiatives in its Political Guidelines 2024-2029, the EDS represents the third major initiative under the presidency of Ursula von der Leyen in the area of protecting democracy in the EU (after the European Democracy Action Plan and the Defence of Democracy Package). While the EDS's embrace of a bottom-up approach arguably marks a meaningful shift in how the Commission conceives democratic resilience, the initiative itself does little to translate this rhetoric into meaningful action. The EDS invites citizens and civil society to assume a central role in safeguarding European democracy, yet most of its measures – ranging from the new European Centre for Democratic Resilience (ECDR) to various soft-law outputs – leave key questions of implementation unresolved. If Member State cooperation on tackling information manipulation and interference remains voluntary, civil society involvement largely consultative, and several flagship initiatives end up being merely symbolic, so will the EDS's ambitious and inclusive language. Its participatory rhetoric should therefore be taken as a reflexive standard against which the Commission's future actions in implementing the initiatives announced in the EDS can be held.

In the following, I develop this argument through the lens of a prominent concept in the EDS: the call for a "whole-of-society approach" to defending democracy.

"Whole-of-society" approach as a novel development

Originating in International Relations, UNESCO defines a "whole-of-society" approach as one that "embraces both formal and informal institutions in seeking a generalized agreement across society about policy goals and the means to achieve them". While the concept has occasionally appeared in other EU policy areas (e.g. the EU's foreign and security policy), its growing use in the defence of democracy – also visible in recent Council Conclusions – is a novel and interesting development.

The concept of a "whole-of-society approach" provides a useful framework for an immanent critique of the EDS. On the one hand, it signals a welcome shift in how the Commission understands the agents and infrastructures of democratic resilience. On the other hand, the EDS's lack of legal and policy innovation raises doubts about whether this rhetoric will be matched with action. Moreover, the new "whole-of-society approach" stands at odds with a worrisome continuity in the Commission's thinking: the EDS still approaches democratic threats as primarily arising from outside European society.

The positive vision: citizens and civil society as central agents

The EDS declares that "[p]rotecting democracy and building the democratic resilience of citizens, societies and institutions is an urgent collective endeavour, which requires a whole-of-government and whole-of-society approach" (p. 2). Throughout the Communication, the protection and the promotion of European democracy are presented as two interdependent and

mutually reinforcing processes. Notably, the EDS considers European citizens to be the drivers of these processes, emphasising their central role in building democratic resilience from the bottom-up. Moreover, a subsection on "Strengthening democracy through whole-of-society actions" recognises that defending European democracy requires strengthening and connecting democratic infrastructures at all levels of the EU's multi-level polity. The Commission explicitly commits to "encourag[ing] and support[ing] grassroots initiatives that bring together people of different ages and backgrounds and strengthen local connections and inclusive public spaces [...]" (p. 25), via initiatives like the EU Network of Local Councillors, the New European Bauhaus, or the Commission's EUROPE DIRECT centres in cities and communes all over the EU.

Read in this light, the concept of a "whole-of-society approach" points to a shift in the EU's approach towards a more decentralised, bottom-up model of building democratic resilience. Given that many of the EU's past efforts in this area were of a rather top-down nature, this is a welcome development. Instead of framing European citizens as the passive beneficiaries of the EU's attempts at defending democracy, the EDS now positions them as its central agents. In this regard, the fact that the EDS was released together with the Commission's new Civil Society Strategy – which reiterates the importance of civil society in defending European democracy – is another encouraging, political sign.

Moreover, and in line with the European Democracy Action Plan and the Defence of Democracy Package, the EDS represents a further step in advancing beyond ex post, reactive EU approaches to democratic regression in Member States. The EDS recognises the need for complementing different forms of EU sanctions (such as financial conditionality and infringement actions) with a more preventive and holistic approach. Finally, the EDS and its "whole-of-society approach" speak to a new sense of institutional humility. Instead of ever-expanding its own toolbox, the Commission seems to be taking a step back, focusing instead on empowering and protecting frontline democracy defenders within civil society. Yet, this development can also be read as false modesty.

The first ambivalence: much talk & little action

Beyond its ambitious rhetoric, the substantive content of the EDS is notably thin. Its only real innovation is the establishment of a European Centre for Democratic Resilience (ECDR). The ECDR is meant to act as a hub that strengthens coordination, information-sharing and operational cooperation across the EU to improve the detection of and response to democratic threats, especially foreign interference and information manipulation. Beyond this, the EDS largely reiterates existing EU laws and initiatives, or announces soft-law outputs still to come – such as a Blueprint for countering disinformation, a competence framework for EU citizenship, Guidelines on citizenship education, or a Democracy guide for EU citizens. In this light, the EDS's call for a "whole-of-society approach" risks obscuring that the Commission itself is not delivering decisive action for defending European democracy.

While there is nothing wrong with prioritising the enforcement of existing EU laws and policies for defending democracy over the creation of new ones, the EDS still falls short in this regard. The Commission does not announce any significant steps for improving the enforcement of the Digital Services Act or the AI Act, for instance with a view to advancing algorithm transparency or the demonetisation of disinformation. Whether the announced additions of a (non-binding) DSA Incidents and crisis protocol, "Guidelines on the fair, transparent and responsible use of AI in electoral processes" or the already dysfunctional Code of Conduct on Disinformation will make a difference in this regard may be doubted. This picture of "much talk, little action" is further reinforced by the fact that Member States' participation in the new ECDR is merely voluntary.

The EDS's lack of assertive action to prevent disinformation has been perceived (here and here) as a worrisome sign of the Commission succumbing to foreign pressure, in particular from the US government. At the same time, and somewhat paradoxically,

the EDS and its rhetoric also exemplify the continuation of a problematic trend in the EU's approach to defending democracy: a disproportionate emphasis on external threats.

The second ambivalence: externalising democratic threats

A further tension arises from how the EDS identifies the threats it seeks to address. Despite its inclusive "whole-of-society" language, the initiative continues to frame the defence of democracy largely through an external-threat lens.

While undoubtedly important, presenting third-country actors as the primary drivers of democratic decay in the EU is reductive and risks obscuring other, homegrown causes. First, foreign interference and information manipulation require fertile political and social soil – which they find in the EU, inter alia, due to increasing socio-economic inequalities and frustration with the (lack of) political responsiveness of governments across Member States. Second, misinformation and attempts at election manipulation are also driven by political forces inside the EU. In the same vein, foreign campaigns often gain traction only because they are amplified internally.

By foregrounding external interference, the EDS sidelines the domestic dynamics that a genuine "whole-of-society approach" would also need to confront. Regrettably, it reproduces the false binary of a democratic EU "inside" that is being attacked by anti-democratic "outsiders", already visible in previous initiatives like the Defence of Democracy Package and its proposal for a Directive on the transparency of foreign interest representation (which I previously discussed on this blog). This weakens the EDS's own claim to mobilise society as a whole, since societal vulnerabilities are treated as entry points for foreign actors rather than as democratic problems that require political attention in their own right.

Making the rhetoric meaningful

While signalling a positive shift in the Commission's perception of how (and by whom) European democracy should be defended, the EDS also exemplifies a lack of political will to assertively enforce existing EU rules and a one-sided threat perception. In this light, and in the spirit of immanent critique, I suggest we take the Commission's call for a "whole-of-society approach" as a reflexive standard of accountability – one to which the Commission should be held (and hold itself) when concretising the different proposals and the overall course of action sketched in the EDS.

For example, the EDS remains vague on how exactly the new ECDR will operate. So far, it states that "(t)he Centre will primarily work as a dedicated hub for exchange and operational cooperation among EU institutions and Member States" (p. 4), with the possibility for civil society organisations and other non-institutional actors to contribute via a Stakeholder Platform. If the Commission is serious about its whole-of-society approach, this Stakeholder Platform must not become an ancillary or purely consultative body, but be equipped with a real say in the ECDR's agenda-setting, threat detection and enforcement processes. Similarly, the Commission must use its political weight to defend the ambitious funding proposed for democracy promotion – €9 billion under a new AgoraEU Programme – against predictable resistance in the negotiations of the next Multiannual Financial Framework. Finally, high-profile initiatives, such as a High-Level Event on Democracy or a European Citizens Panel on democratic resilience, must not remain merely symbolic exercises of what Cristina Lafont calls "democratic illusions". Especially the announced European Citizens Panel presents an opportunity for the Commission to move beyond its narrow and technocratic approach to participatory democracy. By giving the selected participants a genuine power to set the agenda of their own deliberations and ensure their connection to a broader European discourse, the Commission could prove that its calls for enhancing citizens' democratic agency are worth the paper on which the EDS is written.

In conclusion, while the EDS represents a missed opportunity to take concrete, timely action for defending and promoting European democracy here and now, its emphasis on a "whole-of-society approach" is a chance for the Commission to put its money where its mouth is further down the road – by shaping the new

ECDR and other initiatives announced in the EDS in a process of genuine co-creation with all democratically-minded actors across different parts of European society.

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