

## The Global Spread of Misinformation Laws

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Between 2010 and 2022, 80 countries enacted new legislation or amended existing laws in an attempt to curb the spread of misinformation online. This sharp and global adoption of misinformation laws, however, cannot be explained by the sudden emergence of false or misleading information, as these problems have existed for a very long time. Rather, we argue that the global rise in misinformation laws is better explained by the simultaneous occurrence of four facilitating conditions: (1) the popularization of “fake news” by political and media elites, (2) Western influence over global security discourse and policymaking, (3) the desire for governments to control the flow of information, and (4) high-profile revelations around platform governance and harm. Our findings are drawn from a novel data set of legislation passed since 2010 across 177 countries and a systematic literature review of 57 articles.

*Keywords: misinformation, law and regulation, securitization theory, threat construction*

Since 2016, a growing body of scholarship has been identifying and analyzing social media misinformation campaigns around the world (Bradshaw, DiResta, & Miller, 2022; Bradshaw & Henle, 2021; Lukito et al., 2019; Woolley & Howard, 2018). Underlying these investigations has been the concern that misinformation poses a significant threat to national security, freedom of expression, public health, elections, and democratic legitimacy (Tenove, 2020; Wigell, 2021). Although misinformation has a long history in politics and society (Tworek, 2022), it has escalated to the top of many countries’ national security strategies. For example, former U.S. presidential candidate Elizabeth Warren said that disinformation “erode[s] our democracy” and called for a cybersecurity coordinator at the National Security Council to deal with the problem (Kim, 2020). Meanwhile, Canadian Prime Minister Justin Trudeau’s national security advisor

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Date submitted: 07-23-2023

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referred to disinformation as a “threat of a generation” (Nardi, 2023). Often stemming from these concerns, dozens of new laws designed to address misinformation have been legislated around the globe. What explains this quick and renewed focus on the threat of online misinformation?

Social scientists and civil society have analyzed some factors contributing to the rise of misinformation laws around the world, discussing various legal mechanisms and their implications for digital rights online (Baade, 2018; Funke & Flamini, 2018; Kirtley, 2020; LEXOTA, 2023). Another corpus of research has highlighted the role of securitization in the spread of misinformation laws around the world, where the framing of misinformation as a security issue has contributed to the adoption of extraordinary measures to combat these threats, be it to national security, public health, or democracy. Here, many scholars have adopted a country-level approach, analyzing specific case studies about the rise of misinformation laws, including Malaysia’s Fake News Act (Lim, 2020; Neo, 2021), Singapore’s Protection from Online Falsehoods and Manipulation Act (Aljunied, 2019; Neo, 2021), and Taiwan’s Social Order Maintenance Act (Tsui, 2020). Although these accounts are important for shedding light on the unique domestic or regional factors that enabled governments to pass misinformation laws, a narrow focus on single countries or single regions can miss the broader international environment in which misinformation laws have become salient. We complement this body of research by exploring the broader sociopolitical factors that contributed to the *rapid* adoption of misinformation laws *globally*.

Building a novel database of misinformation laws passed between 2010 and 2022, we show that the rise of misinformation laws is indeed rapid and global: during this period, at least 80 countries have passed new legislation designed to combat misinformation online, with 75 countries passing new laws since 2016. We further conducted a systematic literature review to identify common explanations that gave rise to these misinformation laws, identifying four facilitating conditions: (1) the popularization of “fake news” by political and media elites, (2) Western influence over global security discourse and policymaking, (3) the desire for governments to control the flow of information, and (4) high-profile revelations around platform governance and harm. Taken together, these four facilitating conditions made possible the global cascade of misinformation laws.

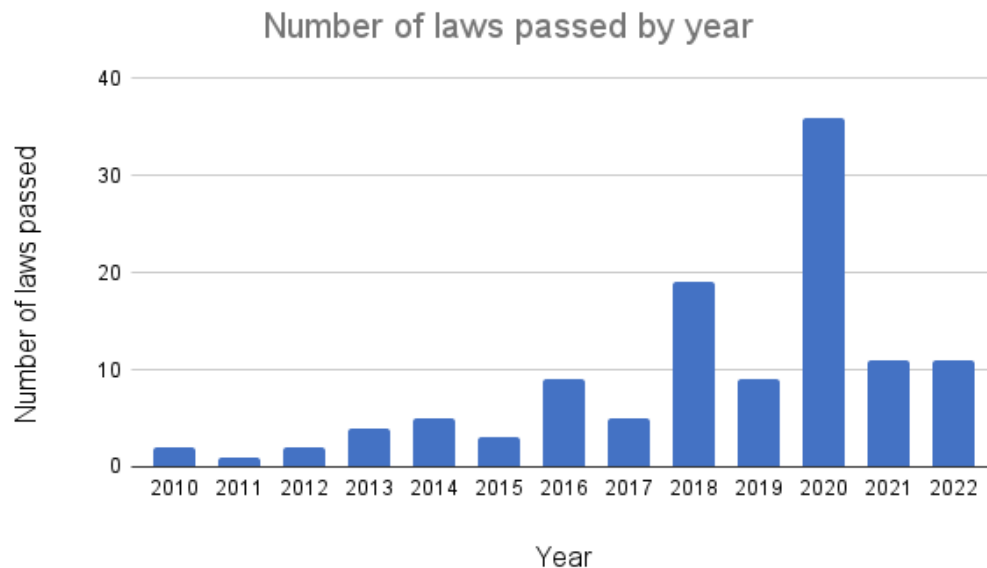
Our macro-level and global approach extends the literature on misinformation and securitization. Our findings highlight the important role that Western institutions play in shaping and legitimizing global responses to misinformation. Whereas most studies focus on individual country-level analyses of misinformation laws, our global and comparative approach complements this work by demonstrating the importance of international power dynamics in the framing of misinformation as a security threat and the subsequent diffusion of misinformation laws. As states look to further centralize information control—or rein in platform power—the threat of misinformation, real or imagined, provides a catalyst for increased regulation.

### **Misinformation and the Global Rise of Fake News Laws**

To empirically study the conditions that facilitated the rise of misinformation laws around the world, we created a globally comparable data set of misinformation laws. We focus our analysis on misinformation laws because they are examples of extraordinary measures, unlike other domestic policy responses that might include media literacy initiatives. Our data set was built in two parts: first by reviewing a collection of existing

databases about government responses to misinformation,<sup>1</sup> then by surfacing additional examples and data through a systematic content analysis of news media articles, think tank reports, academic articles, and legislative proposals for 177 countries and territories between 2010 and 2022. We queried three databases (Factiva, LexisNexis, and Google Search) using the following Boolean logic: "[COUNTRY NAME]" and ("fake news" or "misinformation" or "false information" or "disinformation" or "false news") and ("law\*" or "bill" or "legislation"). Our misinformation law data set can be found in the supplementary files for this study.

To combat the spread of misinformation, 80 countries passed new legislation or amended existing laws between 2010 and 2022. During this time, two countries (Bolivia and Malaysia) repealed their misinformation laws. From 2010 to 2015, only 16 countries passed legislation that explicitly mentioned sharing or publishing false or fake news. In contrast, between 2016 and 2022, 75 countries enacted or amended laws to target false and misleading information and content. During 2020, 17 countries passed COVID-19-specific misinformation laws.<sup>2</sup> Figure 1 shows the number of misinformation laws passed from 2010 to 2022.



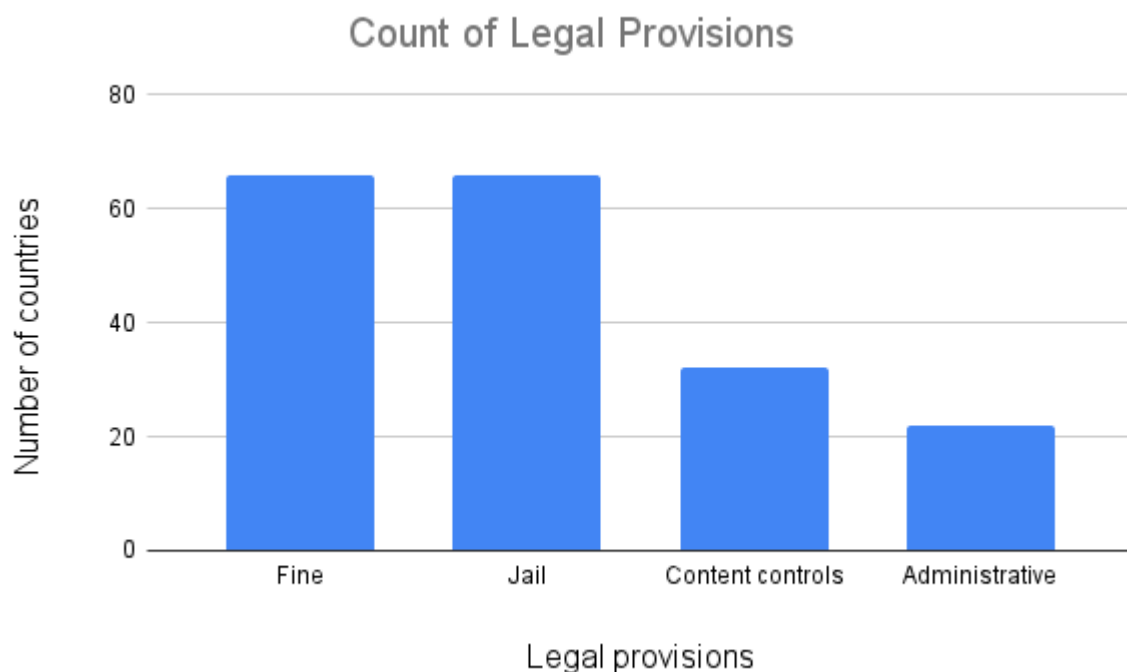
**Figure 1. Passing of fake news laws over time.**

<sup>1</sup> Our work built on data sets built by LEXOTA (Laws on Expression Online: Tracker and Analysis; LEXOTA, 2023), Poynter (A guide to antimisinformation actions around the world; Funke & Flamini, 2018), and the Partnership for Countering Influence Operations at the Carnegie Endowment for International Peace (Yadav, Erdoğan, Siwakoti, Shapiro, & Wanless, 2021).

<sup>2</sup> Algeria, Azerbaijan, Bolivia, Bosnia and Herzegovina, Botswana, Eswatini, Hungary, Jordan, Lesotho, Mauritania, Namibia, Paraguay, Romania, South Africa, Tajikistan, United Arab Emirates, and Zimbabwe. For more details, see International Press Institute (n.d.).



publishing false information, and penalize social media companies along with their executives for failing to remove content deemed illegal from their platforms; (2) laws that specified fines or other monetary penalties, targeting individuals, company executives, media organizations, or social media platforms; (3) laws that specified content controls or forced corrections, which require publishers, social media platforms, Internet service providers, or users to remove the offending content or provide a mandatory correction; and (4) laws that specified new administrative requirements, such as transparency requirements, media licensing regimes, data localization practices, or mandated press councils. Figure 3 shows the breakdown of legal provisions across the misinformation laws in our data set.



**Figure 3. Breakdown of legal provisions across the misinformation laws enacted from 2010 to 2022. Note that the numbers will not add up to 80, as some countries have several laws and most laws contain multiple types of legal provisions.**

When comparing regime type<sup>3</sup> to the legal provisions in misinformation laws, electoral autocracies passed laws with the most provisions ( $N = 90$ ), followed by electoral democracies ( $N = 38$ ), closed autocracies ( $N = 48$ ), and, finally, liberal democracies, which passed the fewest misinformation laws in the 13-year period ( $N = 10$ ; see Table 1). For all regime types, jail sentences and fines were the

<sup>3</sup> Regime type was determined using the Regimes of the World Classification system for the year 2022 from the V-Dem data set, which categorizes regime types into four categories: closed autocracies, electoral autocracies, electoral democracies, and liberal democracies (Coppedge et al., 2023).

largest category of legal provisions. In liberal democracies and some Western countries like Canada and Australia, jail sentences and fines were imposed on executives of social media companies or individuals for knowingly interfering in a democratic process on behalf of a foreign government. In autocratic countries, jail sentences and fines often target individuals and journalists for spreading misinformation on social media, with few targeting social media company executives. Content controls were rarely used in democracies, compared with autocracies, and both democracies and autocracies rarely focused on administrative measures. Although there are differences across the types of laws, such as definitional clarity or enforcement practices, the focus of many misinformation laws on jail sentences or individual fines highlights the security-oriented approach rather than a user privacy or platform transparency response.

**Table 1. Types of Legal Provisions by Regime Type.**

Regime type	Jail sentences	Fines	Content control	Administrative measures
Closed Autocracies	16	16	10	6
Electoral Autocracies	29	32	18	11
Electoral Democracies	16	16	3	3
Liberal Democracies	5	2	1	2

### **The Complex and the Contingent Nature of Global Security**

Over the past few years, misinformation has evolved into a key strategic concept within the realm of security. Its widespread dissemination has given rise to security-focused discourses and new anxieties over the state of democracy and society (Monsees, 2020). Terms such as “cyber pearl harbor” and “infodemic” are commonly employed by mainstream media and other elite actors to characterize these challenges (United Nations, 2020; Vavra, 2021). This has fostered a politically charged environment, where many perceive the misinformation situation as a national security threat, leading to the securitization of misinformation and related policy landscapes.

According to the Copenhagen School’s theory of securitization, as articulated by Buzan, Waever, and de Wilde (1998), security is a socially constructed concept. The securitization lens emphasizes the active process of identifying and framing certain issues as threats, highlighting that perceptions of threats are subjective rather than purely objective. This illustrates the socially constructed nature of security concerns. The process of securitization typically involves a securitizing actor (often an actor with institutional clout and a following audience, such as the state) rhetorically transforming an issue or event into a security threat through “speech acts.” This discursive framing serves as a mechanism for the securitizing actor to justify the implementation of extraordinary measures. Additionally, it convinces the audience of the need to protect a specific referent object—typically national security and survival—creating a state of exceptionality (Balzacq, 2010; Buzan et al., 1998). Essentially, securitization theory argues that something is a security problem when the elite declares it to be so—a phenomenon observed in the evolving misinformation landscape in recent years (Buzan et al., 1998).

Seen in this light, what is or is not a threat is not something that is natural or inherent but a contested concept contingent on multiple factors, such as *who* is performing the speech act, *what* they are

saying, and in what *contexts* is the process occurring in. Scholars have employed the securitization lens to examine a diverse range of issues, including traditional security issues such as the War on Terror, as well as new digital challenges (Gershkoff & Kushner, 2005; Hansen & Nissenbaum, 2009; Lacy & Prince, 2018).

Similarly, misinformation can also be understood as a *constructed threat*. Here, the securitization process involves an actor (the state) rhetorically transforming an issue (misinformation spread on social media) into a threat (national security, public health, and democracy) that warrants exceptional actions (new misinformation laws). This is not to say that there are no effects or harms of misinformation but rather that its elevation to the level of a security issue is socially constructed. After all, misinformation and foreign influence are not new concepts, but it is only recently that these topics have moved from “everyday” politics to “exceptional politics” (Buzan et al., 1998, p. 23). We argue that what is unique about the securitization of misinformation is that the movement from everyday politics to exceptional politics has occurred both rapidly and globally. In this study, we explore what explains this global adoption of misinformation laws, and the variables that contributed to the widespread securitization of misinformation.

To address critiques that securitization theory focuses too heavily on discourse alone (Balzacq & Guzzini, 2015; Stritzel, 2007), we draw from contemporary debates over how threats are constructed to include not just the rhetorical strategies used but the *contexts* and *social conditions* that made this construction possible. Borrowing from Holger Stritzel’s (2007) critique of the original formulation of securitization theory, we therefore take an empirical approach to the study of threat construction, moving beyond discourse analysis to identify the “facilitating conditions” and outcomes of the securitization process.

### **Constructing the Threat of Misinformation Globally**

What are the conditions that helped facilitate the securitization of misinformation at a rapid and global pace? To answer this question, we conducted a systematic literature review of scholarship explaining the emergence and effects of misinformation laws. We surfaced articles, books, and reports by querying ProQuest, JSTOR, SAGE, and HeinOnline Law Library for content published between 2010 and 2022 with the following search parameters: (“fake news” or “misinformation” or “false information” or “disinformation” or “false news”) and (“law\*” or “bill” or “legislation”). From there, we narrowed it down to articles that used empirical evidence to explain why and how misinformation laws were passed and their effects. Our literature review does not include sources that were primarily focused on policy recommendations, commentary, or opinion pieces. In addition, although our literature review included only English-language sources, we were able to include articles from a diverse set of authors, disciplinary backgrounds, and geographies. We found 57 articles and texts, reviewing and coding each resource based on the following: author, title, type of source, publication outlet, research question or objective, region or country, and the coded facilitating conditions (see supplementary files for the data set and coding). We then employed an abductive approach to coding the sources, starting with a set of conditions drawn from theories of securitization, misinformation scholarship, and international relations. As we included more sources in the literature review, we iteratively developed our conceptual framing. Once we had settled on a final set of conditions, we did another round of coding on the entire set of sources (57). This was conducted by all three authors. This allowed us to find common themes and explanations for the passing of misinformation laws across multiple country- or regional-specific case studies. In addition, we went back to our data set and reviewed press statements and

reports from politicians, government agencies, rights organizations, and media coverage throughout this time period, which are used as illustrative examples in the sections below.

We identified four conditions that facilitated the rapid uptake and global adoption of misinformation laws: (1) the popularization of “fake news” by political and media elites, (2) Western influence over global security discourse and policymaking, (3) the desire for governments to control the flow of information, and (4) high-profile revelations around real-world platform governance and harm (see Table 2). Taken together, these four facilitating conditions helped contribute to the construction of misinformation as a threat globally. Once misinformation was effectively framed as a security threat, extraordinary measures in the form of novel legislation were justified and subsequently passed. It is important to recognize that this process is not a smooth or linear one. Rather, the four conditions overlapped with one another temporally and at times reinforced each other.

**Table 2. Summary of Meta-Analysis.**

Popularization of Misinformation by Political and Media Elites	15
Western Influence Over Global Security Discourse and Policymaking	9
State Desire to Control Information	25
High-Profile Revelations About Platform Harm	26

**Note:** Summary of coding from review of 57 meta-analysis articles. The total number does not equal 57 because multiple conditions were coded in several articles.

### ***The Popularization of “Fake News” by Political and Media Elites***

The first condition, derived from our meta-analysis, that gave rise to the securitization of misinformation was popularization of the term “fake news” by political and media elites. Although “fake news” was originally coined by journalist Craig Silverman to describe media that was made to look like real news but contained false and misleading information (POLITICO, 2017), the term has since evolved to lack definitional clarity, particularly as it relates to the substance of the claim, its impact, and the intent of the person who shared it (Bernecker, Flowerree, & Grundmann, 2021; Tandoc, Lim, & Ling, 2018). On one hand, there were a series of high-profile examples of false and misleading statements and manipulated media being spread primarily on social media, and these claims were sometimes referred to as fake news (Bennett & Livingston, 2018). On the other hand, the term “fake news” was also used as a rhetorical device to denounce certain messages and denigrate mainstream media, journalists, and critical voices (Monsees, 2021). In our meta-analysis, scholars often referenced the role of populist, strong-arm, or illiberal leaders in adopting these rhetorical strategies, including U.S. President Donald Trump, former Philippine President Rodrigo Duterte, Hungary’s Viktor Orbán, Turkish President Recep Tayyip Erdoğan, former Prime Minister of Cambodia Hun Sen, Myanmar State Security Official U Kyaw San Hla, and Venezuelan President Nicolás Maduro (Kirtley, 2020; Neo, 2022).

As a rhetorical device, “fake news” was easy to employ and far easier for the public to understand than terms like “disinformation” or “malinformation,” particularly in countries where English is not the primary language. Scholarship has described how the quipiness of the term “fake news” has an ability to provoke intense skepticism, contributing to its virality and outstripping academic alternatives in popular



discourse (Tandoc et al., 2018). Unlike “misinformation” or “disinformation,” which tend to be preferred by academics and some mainstream journalists, “fake news” is immediately catchy and relatable, as most individuals have encountered false information online (Barthel, Mitchell, & Holcomb, 2016).

In addition, “fake news” allowed political leaders to strategically frame oppositional media as a threat, be it to national security, public order, or public health. Framing is a powerful rhetorical tool that politicians use to shape political conflict (Entman, 2003), and the framing of independent media and critical voices reflects long-standing conflicts about media bias that populist politicians have successfully leveraged to generate support (Meeks, 2020). In 2018, more than 20 political leaders used the term “fake news” to “accuse reporters of spreading lies or as a way to discredit journalism they do not like” and to justify the passing of new legislation designed to address “fake news” (Lees, 2018, p. 88). For example, when former Malaysian Prime Minister Najib Razak was accused of corruption, he frequently dismissed these claims and critics as “fake news” (Lahiri, 2018). Similarly, Hungary’s Viktor Orbán called criticism of his COVID-19 law by political opponents and the European Union “fake news” (Radio Free Europe, 2020).

In effect, the use of “fake news” became a crucial component of the securitizing actors’ speech act, allowing leaders to identify a threat (e.g., independent media, oppositional voices, and critics) and link it to a referent object in need of protection (e.g., elections, the truth, public safety, national security). Importantly, its popularization across both elite and common audiences also coincided with the other facilitating conditions discussed below, particularly the growing attention to the harms of social media and the ongoing desire for states to control information. Thus, we can view the popularization of the term “fake news” and its use by political and media elites, whether to disparage critical voices or as a descriptor of false information, as one of the facilitating conditions that contributed to the global securitization of misinformation.

### ***Western Influence Over Global Security Discourse and Policymaking***

The second key condition that gave rise to the securitization of misinformation is the outsized influence Western institutions have on global security discourse and policymaking. Although misinformation has long affected all countries, the targeting of the United States and other Western countries pushed “fake news,” misinformation, and foreign interference into the global spotlight. For example, following several high-profile examples of foreign interference, several Western governments established working groups and special committees to assess the challenges of foreign interference and make recommendations to limit harms (Kalniete, 2023). Many scholars have described biases in international organizations, academia, and newsrooms that often ignore the history, ongoing struggles, and lived experiences of those in the Global South (Aujla-Sidhu, 2022; Jivraj, 2020; Meyers & Leide, 2020). Similarly, scholars in misinformation studies have described how a disproportionate amount of attention has been paid to Western states from the media and research community (Lai & Tang, 2022; Wasserman & Madrid-Morales, 2022). These biases and the outsized influence of Western institutions on global security discourse around misinformation propelled it to the top of other countries’ national security agendas. Thus, it is not just *what* is being said but *who* is saying it.

Calls to legislate misinformation in the Global South quickly followed the Western securitization discourse and the normative power of European countries in global governance. In our meta-analysis and

review of misinformation laws, we found many governments and politicians frequently citing Western-specific concerns and policy proposals. For example, before passing its own misinformation law, Singapore cited Russian foreign interference during the U.S. 2016 presidential election as evidence of the threat of false information and justification for passing the Protection from Online Falsehoods and Manipulation Act (Parliamentary Select Committee on Deliberate Online Falsehoods, 2018). Similarly, when Kyrgyzstan passed their law "On Manipulating Information," they cited the U.K. White Paper on Online Harms, the French Law on the Manipulation of False Information, and the German Act to Improve Enforcement of the Law on Social Networks (NetzDG; Article 19, 2020). Over the years, Turkish government officials have also drawn parallels between Turkey's misinformation laws and NetzDG in Germany (Vetch, 2023), and when the directorate of communications passed Turkey's social media regulation, they stated that similar laws "already exist and are being implemented in many parts of the world, especially in developed countries" (T.C. İletişim Başkanlığı, 2022). The importance of Western influence on the spread of misinformation laws is further exemplified when Fadhlullah Suhaimi Abdul Malek, a senior official with the Malaysian Communications and Multimedia Commission, stated that "When the American president made 'fake news' into a buzzword, the world woke up" (Beech, 2018, para. 16).

Moreover, many of these laws reflect the same Western framing of "fake news" as a threat to democracy. For example, in the run-up to the general election in 2018, the Malaysian government passed the Anti-Fake News Act, a law that ostensibly was supposed to protect citizens and the election from false information. Not only did they cite France, Germany, and the United Kingdom in proposals related to the country's Anti-Fake News Act, claiming "Malaysia is not alone in its view" (Neo, 2022, p. 1932), they also justified the misinformation law as a means of protecting the election from "fake news." Before it being passed, proregime media outlets frequently ran headlines such as "Fake news surging in GE14" and "Opposition Pro-Fake News" (Lim, 2020). As liberal democracies, Western states carry legitimacy when it comes to elections and the democratic process. Combined with the popularization of "fake news" by political and media elites, Western influence on policymaking and security discourse gave top cover to governments interested in expanding information controls.

### ***State Desire to Control Information***

The third key condition that gave rise to the securitization of misinformation is state desire to control information. Governments have long used technical and legal measures to control information and remove content deemed undesirable or threatening to their power (Deibert, Palfrey, Rohozinski, & Zittrain, 2008). These strategies range from complete Internet shutdowns (Diaz-Hernandez, Nunes, & Cheng, 2021; Freyburg & Garbe, 2018) to selective banning of specific mobile apps or websites (Ruan, Knockel, & Ng, 2016; Wright, 2014) to arrests of individuals when technical means are unavailable or impractical (Getz, 2022). More recently, misinformation laws have become a mechanism for information controls.

State desire to control information was the second-largest facilitating condition identified in our meta-analysis. For example, scholars described how fake news laws enable direct censorship of news reporting by ordering content to be taken down (Carson & Gibbons, 2023) and that the application of fake news laws disproportionately targets journalists, civil society actors, political figures, and social media platforms (Teo, 2021). Moyakine and Tabachnik (2021) also discuss how, through misinformation regulation, Moscow has tried

to “strengthen control over the information flow in the Russian segment of cyberspace and . . . to preserve the stability of the current regime” (Moyakine & Tabachnik, 2021, p. 2). False information therefore becomes an opportunity for governments interested in centralizing control of the Internet and public discourse that exist largely on private technology platforms (Anansaringkarn & Neo, 2021).

All states have, to varying degrees, an interest in controlling the flow of information online. For liberal democracies, laws are often built on democratic principles such as free and fair elections, freedom of expression, and transparency, as ensuring accurate information reaches their citizens is important to achieving an informed polity. Protecting the integrity of the democratic process, including the means for deliberation and information sharing, is therefore often tied to national security and state sovereignty (Farrell & Schneider, 2018). Freedom of expression does not have to be in contention with online regulations. Many countries pass regulations that place limits on speech to varying degrees, as these regulations can support freedom of expression, particularly among marginalized groups (Citron & Penney, 2019).

For illiberal states, the control of information is often paramount to maintaining regime strength, often by preventing political opponents from challenging the status quo or misleading citizens through censorship, disinformation, or biased narratives that favor the incumbent (Deibert, 2015; Earl, Maher, & Pan, 2022). However, even authoritarian states must be able to justify information controls (Vuori, 2008). This is especially true for competitive authoritarian regimes, where democratic processes, even if superficially, must be followed (Levitsky & Way, 2002). Over time, a system of governance relying exclusively on force will prove to be untenable, as excessive oppression may ultimately backfire against those in power. Consequently, governments are compelled to seek justification for their extraordinary actions, frequently employing security concerns as a compelling basis for legitimization (Vuori, 2008).

Scholars of the media and communication studies have frequently described how legislation can be used to encourage self-censorship and further consolidate state power (MacKinnon, 2012; Pearce & Kendzior, 2012), and misinformation has provided a novel justification for all states looking to exert more control over the information ecosystem. When “fake news” became popularized by political and media elites and the media, and when Western actors lent legitimacy to misinformation as a security threat, an opportunity to exert greater control over the information ecosystem via misinformation laws arose. In reference to Singapore’s Protection from Online Falsehoods and Manipulation Act (POFMA), media scholar Cherian George called it “an example of legislative opportunism, riding on the global alarm about so-called fake news” (George, 2019, para. 5). Indeed, Singapore’s POFMA is used to exert greater influence over the information space by targeting activists and opposition political figures (Carson & Fallon, 2021). This is a phenomenon happening on a global scale as the Center for the Protection of Journalists describes how fake news legislation has become an increasingly popular tactic for governments around the world, resulting in a noticeable rise in the number of journalists imprisoned on charges of fake news (Beiser, 2018).

### ***High-Profile Revelations About Platform Harm***

The fourth and largest facilitating condition identified in our meta-analysis is high-profile revelations about platform harm and the role of companies in facilitating and amplifying misinformation and foreign interference. Although social media platforms were never truly “wild west” completely free from

government regulation and oversight, privatized governance has long been the norm (DeNardis, 2014; Mueller, 2010). However, the speed and scale at which technology companies have expanded have left policymakers behind on key issues where government intervention or oversight might have been necessary. Following several high-profile revelations about the harms caused by misinformation and foreign interference on digital platforms, regulators have increasingly prioritized addressing this issue.

Our meta-analysis found that misinformation laws frequently described the role of platforms in both making visible and amplifying the harms of misinformation. For example, scholars described how a significant growth in Internet penetration and social media connectivity has brought the impact of fake information to the next level (Lee, 2022) or how the broader systemic issues of surveillance capitalism and attention economics can exacerbate the “fake news problem” (Bakir & McStay, 2018). These concerns have simultaneously facilitated regulatory action against platforms. For example, Rodrigues and Xu (2020) describe how “the proliferation of fake news . . . have ensured that the debate about government regulation of social media platforms continues (p. 126).”

Although politicians and governments may pass misinformation laws for censorship, their justifications are nonetheless based on a kernel of truth: social media platforms have enabled misinformation to spread and, in many cases, caused real-world harm. For example, in the realm of public health, researchers have found that the proliferation of social media misinformation about vaccines causing harm or injury is one of the main causes of vaccine hesitancy (Betsch et al., 2012; Dubé, Vivion, & MacDonald, 2015), and research has found significant evidence of how misinformation has led to lower vaccine intentions and uptake across multiple diseases (Gisondi et al., 2022; Ortiz, Smith, & Coyne-Beasley, 2019). Thus, the demonstrable public health consequences of misinformation about vaccines have provided a substantive rationale for the passage of misinformation laws, even if concerns persist about potential overreach or abuse of such regulations.

That the issue of misinformation and “fake news” is relatable to the general public is an important factor for the securitization process. Far from being a passive actor, the audience is often an active agent, playing a fundamental role in transforming a topic into a threat (Côté, 2016). The process is intersubjective, in that both the audience and securitizing actor affect the outcomes and each other during the process of securitization. In effect, speech acts are meaningful only if there is a responsive audience amenable to the securitizing actor’s narrative. Thus, the fact that the harm caused by social media is recognizable and relatable to the general public enables the likelihood that misinformation will be framed as a security threat. In the United States, for example, approximately two-thirds of adults say falsified news stories are spreading confusion, and 23% admit to having shared fake news (Barthel et al., 2016). Revelations of platform harm also reinforce the first condition about the popularization of “fake news” by elites by providing an already receptive audience.

### **Moving Beyond Security Paradigms in Misinformation Rhetoric and Policy**

The global securitization of misinformation and the resulting surge of misinformation legislation can be attributed to four key facilitating conditions: the popularization of fake news by media and political elites, Western influence over global discourse on security and policymaking, state desire to control information,

and high-profile revelations about platform harm. It is important to recognize that explaining a complex global phenomenon like this is challenging, as the various conditions interact in mutually reinforcing and dynamic ways. However, by examining laws passed in 80 countries and current scholarship at a domestic and international level, we can elucidate why and how this event unfolded on a global scale. Although there are likely other important factors at play, our analysis highlights how these four critical conditions enabled the securitization of misinformation and the subsequent spread of misinformation legislation worldwide.

Although the facilitating conditions we identify above are specific to misinformation, there are four broader lessons that can be gleaned from our analysis. First, threat construction and its resulting government responses are not always confined to the country of origin, but rather can spread across borders and communities as each state adapts preexisting narratives and policy solutions for their own needs and audiences. This is not unique to misinformation laws. Within international relations and comparative politics, myriad studies have shown how policy diffusion, legislative diffusion, and norm entrepreneurship can turn a domestic or regional phenomenon into an international one (Dobbin, Simmons, & Garrett, 2007; Keck & Sikkink, 1998). In addition, it is likely there is a degree of authoritarian learning, whereby leaders in illiberal states are able to hold on to power in part because of their ability to learn from their external peers and collaborate (Hall & Ambrosio, 2017; von Soest, 2015). Scholars of threat construction as well as policy diffusion should therefore pay close attention to the intentional and unintentional ways that domestic and international dynamics can shape the outcome of how a problem is defined and managed.

Second, it is not just *what* is being said, but *who* is saying it. Scholarship has emphasized the role of hegemony in shaping international order (Nexon & Neumann, 2018), as well as the meanings and identities that are affixed to important issues (Wojcowski, 2018). We should therefore be wary of how the international system of states and its hierarchical, though dynamic, nature can affect the diffusion and prominence of certain narratives and policies. Western countries have influenced the global securitization of misinformation because of their standing in the world order, while their status as liberal democracies has lent legitimacy to their concerns over the effects of misinformation on elections and security. However, this may not always be the case, as great power competition is reshaping international influence. Who leaders and policymakers listen to and learn from will therefore also change (Acharya, 2017).

Third, although there are real harms from social media, exclusively framing misinformation as a security issue has narrowed the conceptual framework as well as the subsequent research agendas, how we measure impact, and proposed solutions. Critical disinformation scholars have highlighted how the misinformation landscape should be measured and understood in conversation with the unique histories, cultures, and identities that shape how and why misinformation is created and spread. For example, Kuo, Marwick, Cameron, and Weigel (2021) suggest that mis- and disinformation can also be considered a means of reinforcing and reproducing White identity, heteronormativity, and class privilege in the United States. The securitization of misinformation can also obscure or neglect many of the other reasons people share misinformation, such as a lack of trust in mainstream media (Hameleers, Brosius, & de Vreese, 2022), polarization and partisan identity (Osmundsen, Petersen, Bor, Bechmann, & Petersen, 2021), or simply because they are not paying attention to the facts (Pennycook et al., 2021). As a result, other policy mechanisms for building both short- and long-term resiliency to misinformation might be overlooked. Most of the misinformation-related laws we identified focused on restricting the supply side

of false and misleading information, rather than on accountability, transparency, or the economics incentivizing the spread of misinformation.

Finally, the spread of misinformation on social media will not be the last security issue that elicits a global response. Taking a more reflexive approach, we should ask what the effects of speaking security are and what the ethics are of doing so (Floyd, 2019). This approach to misinformation research may allow us to engage in a more critical analysis of the consequences of Western-led discourse around misinformation for the rest of the world, as well as the role of civil society in countering the securitization and adoption of misinformation laws. Currently, misinformation research is predominantly focused on Western countries and English-language content. This not only skews what gets researched and deemed important, but it creates an unfair hierarchy of privileged “experts” that marginalizes minorities based on race, gender, sexuality, and nationality (Ong & Negra, 2020, p. 558). This narrow perspective can also miss the unique manifestations of misinformation across different languages and geographies, and the distinct ways that the production and consumption of news and information are constrained through limited resources, media repression, Internet access, and digital literacy (Mare, Mabweazara, & Moyo, 2019). As Udupa and colleagues (2021) emphasize, we must take “seriously the cultural variation of speech acts, the normative orders bundled around them, and the historical conditions that underpin them” (p. 9). Consequently, the global battle against misinformation demands a more inclusive and context-aware approach, acknowledging the diverse challenges that arise in different parts of the world (Acharya, 2014).

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