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Propaganda hydra

Russian propaganda always finds new holes in the armor of the restrictions they face in the EU

In March 2022, in response to Russia's full-scale invasion of Ukraine, the European Union imposed sanctions against Russian state-run propaganda outlets, notably RT and Sputnik. Subsequently, the list of sanctioned Russian media outlets expanded from the most well-known state-run outlets targeting international audiences to 'soft power' platforms (such as New Eastern Outlook or the SPAS television channel).

For its part, Russia began to adapt its information policy to the new conditions, to the point that its propaganda content is still present in the EU's information space. Research by the Centre for Democracy and Rule of Law has identified a number of mechanisms for circumventing sanctions restrictions. RT France (using France and Belgium as examples) remained accessible to European audiences through the use of alternative domains and mirror sites, as well as through the automatic reproduction of its content on aggregator sites. In addition, publications were distributed through Russian/pro-Russian networks and cited by other resources independent of the Russian Federation.

Telegram became another platform for 'rescue.' The lack of content moderation at the time turned the platform into a kind of 'safe haven' for Russian propaganda.

The rise and fall of a safe haven

The first wave of migration and growth in Russian propaganda activity on Telegram can be traced back to 2021. It was linked both to the tightening of domestic policy towards Russian content within individual EU countries and to moderation policies on other platforms: X (Twitter), Facebook, YouTube and so on. The second wave of activity by Russian propaganda resources on Telegram was recorded in early 2022. It was focused not only on maintaining their presence, but also on attracting a wider audience. The impetus for this wave was the EU sanctions imposed on RT and Sputnik. For example, the Institute for

Strategic Dialogue noted in its 2022 report that before the ban, the Twitter accounts of RT and Sputnik France actively promoted their Telegram channels (from 1 January to 28 February 2022, the word 'Telegram' was the most frequently used in posts by these accounts).

But from December 2024, Telegram started losing its status as a 'safe haven' for spreading propaganda content in EU countries, as the platform started blocking access to a bunch of Russian government resources for users in the EU.

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But the Russian propaganda infrastructure quickly adapted to the new conditions. A second study by the Centre for Democracy and Rule of Law on access to Telegram channels of Russian Federation resources subject to sanctions, as well as alternative ways of distributing their content in the EU (in particular, Poland) through this platform, revealed a wide range of tools to bypass sanctions. In particular, different language, regional and thematic versions of the same resource are only partially blocked and without any systematic approach. Sanctioned channels often use modified or non-identical names, which makes them difficult to identify and block. In addition, the anonymous article publishing service *Telegra.ph*, developed by Telegram, allows users to bypass the blocking of official domains. Content from a blocked channel can be easily distributed via the *Forward from* function to any other accessible channel, giving users virtually unlimited access to prohibited material. Propaganda content also migrates to alternative, unauthorised channels and is actively distributed through a wide network, from Russian embassies and pro-Russian organisations to local actors in EU countries. For Russian-speaking audiences abroad, regional Telegram channels such as Sputnik even suggest switching to the Max platform, where content can also be consumed without restrictions.

The situation with Telegram is complicated not only due to the aforementioned gaps, but also due to the issue of its regulatory status in

the EU. Telegram's vague data on its users in the EU makes it difficult to classify the platform as a VLOP (Very Large Online Platform) in accordance with the Digital Services Act (DSA). The lack of VLOP status reduces regulatory control and transparency of Telegram's activities.

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Without VLOP status, Telegram avoids the enhanced requirements of the Code of Practice on Disinformation and effective external audits. This makes it a convenient channel for distributing sanctioned content.

Another problem is Telegram's policy on disinformation. The platform insists that by registering reliable sources, users are automatically provided with access to accurate information. But in reality, this approach only allows the platform to function as a safe channel for manipulative content without any restrictions.

Thus, today, the Kremlin's main focus is not on resources, but on content. Direct access for Russian propaganda to audiences in the EU continues to be blocked — first websites, then social media platforms. Even Telegram has begun to restrict EU citizens' access to official Russian resources. But despite the blocking of the source, the content itself continues to spread throughout the European information space.

Current mechanisms are not enough

More than that, there's a growing danger from outside Russian and pro-Russian networks (like Pravda, InfoDefence, UKRLeaks, etc.), which translate and adapt materials from sanctioned Russian resources into the languages of EU countries. Such resources operate freely and transmit Kremlin messages to those who do not speak Russian.

Russia is also seeking access 'from within' other countries. Internal pro-Russian actors and resources are the most effective, as citizens' trust in internal sources of information is always higher.

Nevertheless, the question of how sanctions are implemented in each EU Member State remains relevant, both at the level of internet service providers and online platforms. For example, there is a significant difference in the accessibility of the RT France website between France and Belgium and between different internet service providers within these countries. Such variation in accessibility to sanctioned web resources indicates possible shortcomings in the implementation of sanctions at the state level and in their enforcement by internet service

providers.

Undoubtedly, the Russian Federation's adaptive information policy shows that sanctions restrictions are having an impact.

As a study on Telegram has shown, EU sanctions are currently in place against 27 Russian propaganda resources. But at least one of the Telegram channels from these resources is blocked for only 16 of them, while the Telegram channels of nine sanctioned resources remain accessible without technical restrictions.

Undoubtedly, the Russian Federation's adaptive information policy shows that sanctions restrictions are having an impact, as Russian propaganda and content must find new ways to circumvent the restrictions they face, which hinders the Russian Federation's efforts to promote its own agenda.

However, the existing mechanisms are not enough — sanctions must be part of a comprehensive policy. This should include consistent regulation and control over the implementation of restrictions at the level of providers and platforms, constant monitoring of internal information environments to identify channels for the distribution of Russian content and timely response to such manifestations, as well as increasing the level of media and information literacy among the population.

After all, this is primarily a matter of individual responsibility — both for those who create propaganda content and those who distribute and consume it. Gaps that are not closed create vulnerabilities within countries and societies. These threats should not be underestimated, as this is not only a matter of information security, but also of the sustainability of democracy itself in every European country.



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