China's Global Media Footprint

Democratic Responses to Expanding Authoritarian Influence

by Sarah Cook





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ABOUT THE SHARP POWER AND DEMOCRATIC RESILIENCE SERIES

As globalization deepens integration between democracies and autocracies, the compromising effects of sharp power—which impairs free expression, neutralizes independent institutions, and distorts the political environment—have grown apparent across crucial sectors of open societies. The Sharp Power and Democratic Resilience series is an effort to systematically analyze the ways in which leading authoritarian regimes seek to manipulate the political landscape and censor independent expression within democratic settings, and to highlight potential civil society responses.

This initiative examines emerging issues in four crucial arenas relating to the integrity and vibrancy of democratic systems:

- Challenges to free expression and the integrity of the media and information space
- · Threats to intellectual inquiry
- Contestation over the principles that govern technology
- Leverage of state-driven capital for political and often corrosive purposes

The present era of authoritarian resurgence is taking place during a protracted global democratic downturn that has degraded the confidence of democracies. The leading authoritarians are challenging democracy at the level of ideas, principles, and standards, but only one side seems to be seriously competing in the contest.

Global interdependence has presented complications distinct from those of the Cold War era, which did not afford authoritarian regimes so many opportunities for action within democracies. At home, Beijing, Moscow, and others have used twentyfirst-century tools and tactics to reinvigorate censorship and manipulate the media and other independent institutions. Beyond their borders, they utilize educational and cultural initiatives, media outlets, think tanks, private sector initiatives, and other channels of engagement to influence the public sphere for their own purposes, refining their techniques along the way. Such actions increasingly shape intellectual inquiry and the integrity of the media space, as well as affect emerging technologies and the development of norms. Meanwhile, autocrats have utilized their largely hybrid state-capitalist systems to embed themselves in the commerce and economies of democracies in ways that were hardly conceivable in the past.

The new environment requires going beyond the necessary but insufficient tools of legislation, regulation, or other governmental solutions. Democracies possess a critical advantage that authoritarian systems do not—the creativity and solidarity of vibrant civil societies that can help safeguard institutions and reinforce democratic values. Thus, the papers in this series aim to contextualize the nature of sharp power, inventory key authoritarian efforts and domains, and illuminate ideas for nongovernmental action that are essential to strengthening democratic resilience.



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EXECUTIVE SUMMARY

Over the past decade, the Chinese Communist Party (CCP) has overseen a dramatic expansion of efforts to shape media content around the world, affecting every region and multiple languages. Leveraging propaganda, disinformation, censorship, and influence over key nodes in the information flow, these efforts go beyond simply "telling China's story." Their sharper edge often undermines democratic norms, erodes national sovereignty, weakens the financial sustainability of independent media, and violates local laws. No country is immune: the targets include poor and institutionally fragile states as well as wealthy democratic powers.

Beijing has insinuated its content, economic leverage, and influence into foreign media markets in many subtle ways—for example, through content-sharing agreements and media partnerships that result in vast amounts of Chinese state media content dominating portions of the news, or through stifling independent coverage that is critical of the People's Republic of China (PRC). But the CCP's success has also been aided by weaknesses within democratic and semi-democratic countries. The key Chinese state-linked efforts to manipulate foreign information environments have grown such that hundreds of millions of news consumers around the world routinely view, read, or listen to information created or influenced by the CCP, often without knowing its origins.

As China's leadership refines its strategy and expands its media influence efforts to new countries, a more coordinated and comprehensive response is needed. This report documents how nongovernmental actors have contributed to a growing accumulation of activities aimed at countering Beijing's media influence and protecting democratic institutions. An acknowledgment and understanding of the challenges that the Chinese party-state and related actors pose to media freedom globally—not only by China experts, but by the full array of nongovernmental actors engaged in the media, news, and technology sectors—must be central to this response.

One of the greatest needs is for **the "CCP factor" to be mainstreamed** into nongovernmental work related to protecting media and internet freedom. Such a strategy should build on existing initiatives and include, among others, the following elements:

- **Investigation and research:** Academic institutions, think tanks, research entities, and donors should continue existing work and ensure resources are available to monitor and expose CCP media influence activities in a credible, professional, and sustained way in the coming years.
- Action by media outlets: Local media should improve their awareness of the potential journalistic and political pitfalls of accepting Chinese state or proxy investment, paid supplements, and coproduction deals.
- **Civil society advocacy and responses:** International and local press freedom groups should consider whether and how to incorporate a CCP media influence dimension into current or future projects, with support from donors. Such initiatives could support internal capacity building, journalism trainings and education, media literacy, policy advocacy, and information sharing and coordination.
- **Technology sector response:** Technology firms should seek further opportunities to work with researchers and civil society in identifying emerging threats and problematic accounts tied to the Chinese party-state. They must also ensure that independent voices, activists, and content producers who are critical of the Chinese government have a clear avenue for appeal if they encounter problems on the companies' platforms.

The Chinese Communist Party (CCP) and People's Republic of China (PRC) government entities have long sought to influence public debate and media coverage about China outside of the country.¹ For the past decade, however, party leaders have overseen a dramatic expansion of efforts to shape media content around the world, affecting every region and multiple languages. The campaign seeks to present China's authoritarian regime as benign, promote China as a model for governance and information management in developing countries, and encourage openness to Chinese financing and investment. It simultaneously aims to suppress criticism of PRC domestic policies or the activities of China-linked entities abroad and gain support from foreign policymakers for particular Chinese government positions on topics like Taiwan, Xinjiang Uyghur Autonomous Region, Tibet, Hong Kong, or Falun Gong.

The CCP's tactics range from widely accepted forms of traditional public diplomacy and other forms of soft power, to more covert, corrupt, and coercive activities. In the gray zone between the latter two poles of this spectrum are "sharp power" efforts that take advantage of the public sphere within open societies but which have the effect of compromising democratic integrity. These practices go beyond simply "telling China's story." Their sharper edge often undermines democratic norms, erodes national sovereignty, weakens the financial sustainability of independent media, and violates local laws. Moreover, no country is immune: the targets include poor and institutionally fragile states as well as wealthy democratic powers.

While Beijing's growing investment in foreign media influence has yielded some gains, the campaign has also encountered obstacles such as journalistic integrity and public skepticism about state-run media.² In fact, the past three years have featured a wave of pushback. In many countries, governmental and nongovernmental actors alike have come to recognize the threat that CCP media influence poses to democratic freedoms and structures. Resistance has come from the media industry itself, as well as policymakers, the technology sector, and civil society.

But as China's leadership refines its strategy and expands its efforts to new countries, a more coordinated and comprehensive response is needed. At the center of such a response must be an acknowledgment and understanding of the challenges that the Chinese party-state and related actors pose to media freedom globally—not only by China experts, but by the full array of nongovernmental actors engaged in the media, news, and technology sectors.

To fully appreciate the problem, it is necessary to break down and examine the various tactics employed in Chinese state-linked efforts to manipulate foreign information environments. These can be divided into four categories: **propaganda**, or the active promotion of Chinese government content and pro-Beijing media outlets and narratives; **disinformation**, meaning the purposeful dissemination of misleading content to divide audiences and undermine social cohesion, increasingly via inauthentic activity on global social media platforms that are banned inside China; **censorship**, including the suppression of unfavorable information and obstruction of outlets that are critical of the regime; and **gaining influence over key nodes in the information flow**, which usually entails Chinese technology firms with close government ties building or acquiring contentdissemination platforms in other countries.

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Collectively, these tactics have expanded over the past decade to the point that hundreds of millions of news consumers around the world are routinely viewing, reading, or listening to information created or influenced by the CCP, often without knowing its origins. Indeed, even as the party's reach has grown and its practices have adapted to local media environments, awareness of its capabilities and impact has not kept pace in many countries.

The January 2020 Freedom House report, *Beijing's Global Megaphone*, found that the constant evolution and expansion of the PRC's media toolbox has accelerated since 2017.³ The pace of change seems to have intensified further in recent months, as the CCP attempts to restore its international reputation after its initial cover-up of the COVID-19 outbreak and take advantage of the economic weakness and political divisions that have emerged within and among democracies during the crisis. The following section provides a brief overview of the CCP's main media influence tactics and the latest trends in their development.

PROPAGANDA

The Chinese government and state media are spending hundreds of millions of dollars per year to spread their messages to audiences around the world. While some of their activities fall within the scope of public diplomacy or "soft power" strategies used by other governments, including democracies,⁴ there are also clear patterns that suggest Beijing employs dishonest and corrupt methods to forward their message. Efforts to disseminate state media content frequently lack transparency, and coproductions or coopted private media further obscure the political and economic motivations driving certain reporting. Such tactics have been used for decades among overseas Chinese-language media to spread the CCP's messaging, subvert local outlets, amplify pro-Beijing voices, and suppress critical coverage.⁵ They are now being applied—with some effect—to mainstream media in other languages.

The CCP's propaganda tactics include:

• **Building up the overseas capacity and presence of official state media** under their own mastheads, including via social media platforms like Twitter and Facebook that are blocked in China. The taglines or profiles these outlets use to identify themselves typically omit any reference to their state-run status, and they are often designed to gain followers among internet users outside of North America and Western Europe.⁶

- Insinuating official views into foreign mainstream media via op-eds by Chinese diplomats and officials, in which the authors' ties to the Chinese state are clear, as well as through paid advertorials and content-sharing agreements that at least partially obscure the content's origins and party-state funding. These methods enable content created by Chinese state media or official sources to circulate widely, reaching foreign audiences through their favored outlets. For example, since 2018, China's official Xinhua News Agency has signed content exchange agreements with local news services in both democratic and authoritarian countries, including Australia, Italy, Bangladesh, India, Nigeria, Egypt, Thailand, Vietnam, Belarus, and Laos.⁷ Most news consumers in these countries are unlikely to note Xinhua's presence in the byline of an article, and even if they do, they may not be aware of the agency's subservience to the CCP.
- **Cultivating foreign outlets and journalists** who can produce their own favorable content. This occurs via Chinese embassy outreach to editors and media owners (at times involving implicit or explicit coercion), trainings, all-expenses-paid trips to China, memoranda of understanding with journalists' unions, coproductions, and other partnerships that provide political or economic benefits to local media, often in exchange for more positive and less critical coverage of China and its government.⁸ Over the past decade, the PRC government has sponsored thousands of choreographed trips to China for journalists, editors, and managers from news outlets around the world, in which their movements are monitored and they are typically exposed to only a limited set of official perspectives about China's development, institutions, and culture. Journalists returning from such trips are meant to publish glowing articles about China in their home media, with some reporting that this was explicitly cited as an expectation by their Chinese hosts. Follow-on meetings and conferences targeting senior foreign journalists and editors—organized by Chinese embassies or local proxy nongovernmental organizations (NGOs) and research institutions—reinforce the relationships and themes established during trips to China.⁹
- Acquiring stakes in existing local media or establishing new outlets in foreign markets. These projects are undertaken by Chinese state entities, private companies with close government ties, or individual Chinese or local businesspeople who are favorable to Beijing. Even when acquisitions do not give the Chinese buyers a controlling stake, the access they
 obtain enables potential editorial influence. Some outlets have resisted infringements on their independence, but purchases of stakes by CCP-linked companies or individuals have also resulted in shifts in the editorial line in well-documented cases in Taiwan,¹⁰ South Africa,¹¹ and the Czech Republic.¹²

As these and other forms of CCP influence unfold in various countries, additional dynamics and trends have begun to emerge.

First, there is an increasingly clear intersection between broader CCP political influence in a given setting and attempts to shape the media narrative. Specifically, as particular local leaders, especially high-ranking officials, seek Beijing's favor for political and economic reasons, they echo pro-China talking points and take actions—sometimes at the request of PRC officials—that reinforce preferred CCP narratives and gain significant local media attention. For instance, in the early stages of the COVID-19 pandemic, top government officials in Europe, such as the president of Serbia and the foreign minister of Italy, greeted planeloads of medical supplies arriving in their countries from China and made effusive public statements of gratitude for the assistance.¹³ This political theater generated notable media attention and reinforced public perceptions that the PRC had provided more assistance than the European Union, even when this was not the case.¹⁴

Second, Chinese state media and other propaganda efforts continue to diversify their foreignlanguage output. Initially, major state media like China Global Television Network (CGTN, the international arm of state broadcaster China Central Television) expanded from providing English and Chinese, to also include Spanish, French, Russian, and Arabic. Today, their footprint is evident in a much wider array of languages and markets. Thai vernacular media are replete with content produced by Chinese state media.¹⁵ Much of the China-related news coverage offered by one of Italy's major news agencies is drawn from Xinhua.¹⁶ And in Portugal, the company of Macau-based businessman Kevin Ho purchased a 30 percent ownership stake in the Global Media Group in 2017.¹⁷ He has since attained a seat as a delegate to the National People's Congress,¹⁸ China's largely rubber-stamp parliament, and the media group is seeking new partnerships in other Portuguese-language markets like Brazil and Mozambique.¹⁹

Third, in addition to the usual messaging that portrays a positive image of China and its regime, much more negative and belligerent narratives targeting perceived CCP competitors, adversaries, and enemies have emerged over the past year and a half. This was initially evident as protests against a proposed extradition bill flared in Hong Kong during the summer of 2019. On the Twitter and Facebook feeds of Chinese state media, sprinkled among glowing posts about pandas, bullet trains, Xi Jinping speeches, and the Belt and Road Initiative, there appeared videos likening Hong Kong protesters to the Islamic State militant group and the rise of student activists to the use of child soldiers.²⁰ As U.S.-China relations have soured over the past year, particularly following the coronavirus outbreak, anti-American narratives have been aggressively promoted.²¹

DISINFORMATION

In 2016, when Russian agents used disinformation tactics in an attempt to influence the U.S. election, there was sparse evidence that Beijing engaged in any similar strategies to manipulate discourse on global social media platforms. This has clearly changed, as numerous disinformation campaigns and content manipulation efforts have been attributed to China-based perpetrators, even if their methods and goals often diverge from those backed by the Kremlin.²² According to the Oxford Internet Institute, it was in 2019 that the Chinese government displayed "new-found interest in aggressively using Facebook, Twitter, and YouTube."²³

Over the past two years, those social media platforms have announced large-scale takedowns of inauthentic China-linked accounts, and independent investigations by journalists, think tanks, and NGOs have revealed repeated and persistent campaigns to spread false and demonizing information about Hong Kong prodemocracy protesters, CCP critics and Chinese civil society activists inside and outside China, Taiwanese politicians and electoral candidates from the Democratic Progressive Party, and COVID-19.²⁴ The tools employed include content farms that push out information simultaneously across multiple platforms; hijacked or purchased Facebook groups, pages, and accounts; text-messaging campaigns; coordinated trolling activities meant to manipulate search results; automated "bot" networks organized to influence Twitter hashtags; and more. In many cases, direct attribution to Chinese party-state actors has been challenging, but evidence of such ties has been found in several instances.²⁵ And in all cases, the campaigns and networks appeared to support well-documented political and content preferences of the CCP.²⁶

As with propaganda efforts, disinformation activity appears to be expanding, both in scale and audience. There are examples in languages other than Chinese and English, including Serbian and Italian.²⁷ Moreover, some of the campaigns—in places like the United States,²⁸ Taiwan,²⁹ and Argentina,³⁰ among others—appeared designed to sow divisions within democratic societies and alliances, rather than simply promote pro-Beijing viewpoints.³¹



CENSORSHIP

Ten years ago, the CCP's efforts to censor external media appeared to focus mainly on international outlets operating within China and on Chinese-language outlets abroad, including those in Hong Kong and Taiwan. Campaigns to influence the mainstream media in Europe, Africa, Latin America, Southeast Asia, and elsewhere were generally limited to propaganda—the promotion of Chinese state media content and narratives—as opposed to the suppression of critical local coverage.³²

But this appears to be changing, particularly as Chinese state-linked entities increase their investments in other countries and grow more sensitive to local debates about China's role. PRC officials have begun to use economic leverage to silence negative reporting or commentary in local-language media with greater frequency.

The CCP's methods in this regard can be grouped into four main categories: direct action by Chinese government representatives, positive and negative incentives for self-censorship among media owners, indirect pressure through proxies like advertisers and local governments, and physical, cyber, or verbal attacks.

For the party's narrative to be convincing to audiences inside and outside China, reporting about the darker sides of CCP rule at home and of PRC activities abroad must be controlled and suppressed.

For example, in Sweden and Russia, PRC embassy officials have insulted and threatened journalists and news outlets in response to critical reporting about the regime's persecution of abducted bookseller Gui Minhai or the state of the Chinese economy.³³ At one news outlet in Nigeria, when journalists sought to cover specific stories that might be unfavorable to China, their editors reportedly prioritized input from PRC embassy officials and promoted a more positive angle.³⁴ In the Czech Republic, content analysis of coverage from a media group acquired by the Chinese energy and finance conglomerate CEFC—an ostensibly private company with close Chinese government ties and internal CCP cells³⁵—found that negative and even neutral coverage of China declined significantly while positive reporting increased following the change in ownership.³⁶ In South Africa, five years after two companies with ties to the Chinese government and state media purchased a 20 percent stake in the country's second-largest media group, a writer who discussed Chinese government repression of Uyghurs in Xinjiang had his column abruptly discontinued.³⁷ And in Nepal in May 2019, the country's state news agency, which has a content-sharing agreement with Xinhua, launched an investigation into three reporters who had circulated a news item about the Dalai Lama, the exiled Tibetan spiritual leader whose very name and image are tightly censored inside China.38

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It is not by chance that Beijing's multibillion-dollar effort to expand the reach of state-run media has been coupled with increasing attempts to silence critical voices and reporting in other countries. For the party's narrative to be convincing to audiences inside and outside China, reporting about the darker sides of CCP rule at home and of PRC activities abroad must be controlled and suppressed. Indeed, in several instances, the expansion of Chinese state media in a given setting—in media markets as diverse as France,³⁹ Cambodia,⁴⁰ Hong Kong,⁴¹ and Papua New Guinea⁴²—has coincided with or directly resulted in the displacement of sources of information that are more editorially independent or critical of the Chinese government.⁴³

CONTROLLING CONTENT DELIVERY SYSTEMS OUTSIDE CHINA

Over the past decade, Chinese companies have become increasingly active in building information infrastructure and content delivery systems abroad. Although privately owned, technology giants like Huawei and Tencent retain close ties with the PRC government and security services, routinely providing censorship and surveillance assistance to the party-state within China.⁴⁴ The international expansion of such companies has received the explicit blessing of the CCP.⁴⁵

As these and other Chinese firms gain more influence and control over the avenues of content transmission and dissemination, they open the door to a whole new level of influence. CCP-friendly gatekeepers are now positioned to manage information flows in other countries. Analyst Peter Mattis has argued that the CCP's approach over the past decade has been at least as much about controlling the medium as about controlling the message: "This way they can essentially have a monopoly on the information environment. That makes it easier for their narratives to be received and accepted."⁴⁶

There is already evidence of Chinese companies using their control over dissemination channels to create advantages for Chinese state media or to suppress information deemed undesirable by Beijing. In the digital television sector, Chinese firms like StarTimes in Africa have become dominant players. Although they offer television service to millions of people who previously lacked access, their efforts are indirectly benefiting Chinese state media. The most affordable and therefore more popular packages feature a combination of local stations and Chinese state-run outlets. Packages that include more independent global news sources like the British Broadcasting Corporation (BBC) or Cable News Network (CNN) are significantly more expensive. Beyond Africa, Chinese companies are playing a role in digital television expansion in countries like Pakistan, Cambodia, and East Timor, also with signs of advantageous access for Chinese state television stations.⁴⁷

In the social media sphere, Chinese companies' growing role in content delivery systems creates opportunities for the CCP to influence not only foreigners' views about China, but also the news they receive about their own countries and political leaders, with possible implications for policymaking and the outcome of elections.⁴⁸ This has already been the case among Chinese diaspora communities, where WeChat, Tencent's popular messaging application, has been found to censor the posts of Chinese activists and independent media while allowing pro-Beijing media and narratives to spread widely. The app's design has also been criticized for its tendency to deemphasize the source and credibility of information, aiding the spread of misinformation and making the fight against fake news even more difficult than it is on other social media platforms.⁴⁹ The growing use of WeChat among non-Chinese speakers in settings ranging from Malaysia and Mongolia to Australia and Canada also creates a strong foundation for future CCP disinformation campaigns or election meddling.

Separately, in August 2020, Reuters reported that the Chinese tech firm ByteDance had censored articles critical of the Chinese government on its Baca Berita (BaBe) news aggregator app, which is used by millions in Indonesia, from 2018 to mid-2020, based on instructions from a team at the company's Beijing headquarters.⁵⁰ The restricted content reportedly included references to "Tiananmen" and "Mao Zedong," as well as to China-Indonesia tensions over the South China Sea and a local ban on the video-sharing app TikTok, which is also owned by ByteDance. Conflicting reports from the company and sources cited in the article claimed that the moderation rules became less restrictive in either 2019 or mid-2020.

IMPACT

As the Chinese party-state pours resources into its foreign propaganda and censorship efforts, it is important to ask how effective they have been in different parts of the world, either in shaping public perceptions or achieving other CCP goals, like suppressing criticism. The answer to this question is mixed. Some of Beijing's initiatives have run into significant stumbling blocks, particularly surrounding the onset of the COVID-19 pandemic and the mass detention of Uyghurs in Xinjiang, offsetting previous gains. Other projects have been remarkably effective or laid the groundwork for long-term advances.

In terms of China's image around the world, public opinion surveys and academic studies indicate that in the initial years of state media expansion, views on China and Xi Jinping personally improved—particularly in parts of the Global South, including several African countries,⁵¹ as well as places like Lebanon, India, Brazil, and Argentina.⁵² Since 2015, however, the percentage of the population expressing a favorable view of China in Pew surveys has declined—sometimes precipitously—in influential developing countries like Indonesia, the Philippines, India, Brazil, Argentina, and Kenya.⁵³ Although it is difficult to isolate the precise cause, the dip has coincided with Beijing's more aggressive actions in the South China Sea, the regime's program of mass detention in Xinjiang (and its exposure by international media and researchers), and the PRC government's dramatic moves to curtail freedom and autonomy in Hong Kong. After the global spread of the coronavirus was exacerbated by an initial cover-up by CCP officials, public views of China and Xi Jinping have reached historic lows in many countries,⁵⁴ especially in advanced economies.⁵⁵

Indeed, the regime's ability to change public perceptions—including about the origins of the coronavirus pandemic—in its favor has encountered serious challenges. A survey of 26,000 people in 25 countries conducted by the YouGov-Cambridge Globalism Project and published in October 2020 found that the overwhelming majority of respondents in every country but China believed the coronavirus was first detected in China, including over 85 percent in Nigeria, Spain, and South Africa, as well as 83 percent in Saudi Arabia.⁵⁶ This is despite persistent attempts by state media and PRC diplomats on Twitter to deflect blame and relocate the virus's origin to the United States, Italy, or elsewhere. More broadly, within the community of current and future journalists in many developing countries, there appears to be skepticism about and limited credibility attributed to

Measurements of public or journalistic opinion do not tell the full story. Of equal or greater significance are the more subtle ways in which Beijing has successfully insinuated its content, economic leverage, and influence into foreign media markets. Chinese state media. This is evident from surveys and focus groups conducted in Kenya and South Africa,⁵⁷ as well as interviews with media professionals in the countries of the Mekong River region.⁵⁸

But measurements of public or journalistic opinion do not tell the full story. Of equal or greater significance are the more subtle ways in which Beijing has successfully insinuated its content, economic leverage, and influence into foreign media markets, and the extent to which this has begun to bear fruit. Content-sharing agreements signed by Xinhua and other such partnerships established over the course of many years are now resulting in vast amounts of Chinese state media content dominating portions of the news in places like Italy and Thailand. Coverage of the potential downsides of China's foreign investments and lending have been stifled in some countries. Disfavored outlets have suffered from or been threatened with financial difficulties. Ongoing efforts to coopt or marginalize independent Chinese diaspora news outlets and censor critical views on Chinese-owned social media platforms like WeChat have reduced overseas Chinese audiences' access to unbiased information-not only about events in China, but also about their home countries' relationship with Beijing and other topics of relevance to their day-to-day lives.

HOW WE GOT HERE: CCP STRENGTHS AND DEMOCRATIC VULNERABILITIES

One explanation for Beijing's growing influence on media in other countries is the simple fact of China's emergence as a global power over the past two decades. In the year 2000, China was the sixth largest economy,⁵⁹ and it accounted for only 22 million internet users. It is now the world's second largest economy and boasts by far the largest number of internet users, with over 900 million as of March 2020, according to government figures.⁶⁰

Added to this general increase in China's global presence is the sheer amount of human and financial resources that the CCP, state media, and Chinese tech entrepreneurs have invested specifically in expanding their reach to foreign audiences. This investment is credibly estimated at hundreds of millions of dollars per year, if not more.⁶¹ Beyond the media sector, the high degree of Chinese government-led engagement with foreign states—including through the Belt and Road Initiative, a sprawling trade and infrastructure-development program launched in 2014—has created new incentives for local politicians to curry favor with Beijing. When investment flows to industries or locales of political significance or serves the business interests of local media owners, news coverage is more likely to reflect Beijing's implicit or explicit preferences—whether in terms of uncritical promotions of China-linked projects or a reluctance to publish investigations or commentary that might call such projects into question. China's massive internet user population is also a powerful enticement to foreign media entities seeking consumers for their entertainment and other products, motivating them to tread carefully with the Chinese authorities.⁶²

The CCP clearly has a number of important assets that support its media influence efforts, but its success is aided by existing weaknesses within democratic and semi-democratic countries that should not be ignored.

The **financial vulnerability** of local media, due in part to market forces and technological change, render them more likely to accept paid advertorials or sell ownership stakes to companies or individuals with close ties to the PRC government. Cash-strapped media outlets find it difficult to refuse partnerships and free content from Chinese state outlets like Xinhua. The structure of media financing, including dependence on advertising revenue, also creates an opening for Chinese diplomats and companies to exert influence by funding advertising or bullying other businesses into removing ads from disfavored outlets, harming their sustainability. Few governments have been willing or able to replace lost revenue for outlets that are barred from China or punished by advertisers at Beijing's behest.

In many parts of the world, there is an **imbalance of expertise** between Chinese actors and local politicians, journalists, think tanks, and civil society that benefits Beijing. Specifically, there is often a relatively low level of independent domestic expertise on China and the CCP itself—including its structural control over state media, the outsized role of the CCP's Central Propaganda Department in dictating narratives, and the foreign cooptation activities of the United Front Work Department. By contrast, the level of regional expertise among Chinese state media outlets and diplomats operating abroad has risen exponentially, resulting in a more sophisticated approach to foreign media influence that exploits openings in democratic political systems while targeting local audiences with tailored messaging.⁶³

In **countries with a large Chinese diaspora**, Beijing has often already made **strong inroads in the Chinese-language media sector.** The activism of exile communities that are critical of the CCP—such as democracy advocates, Uyghurs, Tibetans, and Falun Gong practitioners—galvanizes Chinese diplomats to deploy more aggressive tactics in an attempt to suppress unfavorable speech and news coverage. Despite ongoing pushback from these communities, and growing awareness among some democratic governments of the need to protect them and support independent media alternatives, the long-standing campaigns aimed at the diaspora create a foothold for broader influence in local mainstream outlets.

There are other factors that could increase the vulnerability of democracies—particularly to certain forms of political or electoral manipulation. One is the widespread use of **Chinese-owned social media or news aggregator applications** among both local Chinese diaspora members and non-Chinese-speaking users. Another is a **high level of political polarization**, which sows distrust in mainstream media and creates natural cleavages or allies that Chinese state-linked actors could exploit to Beijing's benefit.

Democratic governments have begun to realize the threat that CCP media influence activities can pose to media freedom, democratic institutions, and even national security. But if they respond too harshly or without due consideration, they risk damaging the very freedoms they are ultimately trying to protect. A high degree of **anti-U.S. or anti-Western sentiment** among the general public in some countries, especially in regions like Latin America, the Middle East, or Africa, can undercut any warnings by Washington and its partners about the dangers of media investment from authoritarian states. Local skeptics may be apt to draw parallels between the described threat and similar activities by U.S. or European actors. For example, they could point out that both TikTok and Facebook have sold user data to third parties or facilitated the spread of politicized disinformation; that France, the United Kingdom, and the United States all finance foreign media initiatives, notwithstanding fundamental differences in editorial independence between these services and China's; or that CNN and CGTN are both perceived by some observers as presenting biased narratives, disregarding the vast gulfs between their legal, commercial, and political contexts.

Democratic governments have begun to realize the threat that CCP media influence activities can pose to media freedom, democratic institutions, and even national security. But if they respond too harshly or without due consideration, they risk damaging the very freedoms they are ultimately trying to protect. **Blunt policy instruments**—like restricting visas for any journalists holding a PRC passport, regardless of the outlets they work for, or arbitrarily

banning specific Chinese-owned apps, rather than setting clear data-privacy standards that apply to all companies—can be counterproductive, limiting free expression and access to information and potentially harming the sorts of independent voices that might mitigate the impact of pro-Beijing media. Such restrictions may also reinforce accusations of hypocrisy from PRC officials and others by essentially mimicking authoritarian tactics. More nuanced policies that narrowly target the most severe threats or impartially enforce industrywide rules on transparency and fairness will probably be more successful in the long run.

A SHIFTING TIDE? SOURCES OF RESILIENCE AND LESSONS LEARNED

Despite the strengths brought to bear by the CCP, and the opportunities provided by certain democratic weaknesses, a review of recent global developments points to a growing accumulation of advocacy, expertise, policymaking, legislation, and other activity aimed at countering Beijing's media influence and protecting democratic institutions.

The cases listed in the table on pages 11 and 12 represent a small sample of the ways in which nongovernmental actors alone have responded to CCP pressure on media freedom. One common type of activity is the **exposure and analysis of disinformation campaigns and tactics**. Over the past year, as think tanks, investigative journalists, technology firms, and cybersecurity companies have had time to examine the increasing number of datasets related to China-linked

disinformation campaigns, they have generated a body of literature on the topic and set the stage for improvements in prevention, monitoring, and remediation.⁶⁴ In the **technology sector,** international social media companies—including Twitter, Facebook, and YouTube—have taken new measures over the past year to track inauthentic activity linked to China, expose emerging campaigns, take down problematic accounts, and implement labeling that clearly designates Chinese state-funded or state-affiliated accounts,⁶⁵ in coordination with researchers and civil society.

In the media sector, several prominent U.S. or U.K.-based news outlets have **discontinued paid advertorial supplements from Chinese state media**. Although the outlets have not made public statements explaining the changes, the shifts come at a time when reporting has spotlighted problematic content in the supplements about COVID-19,⁶⁶ transparency has increased regarding the revenue produced by advertorials,⁶⁷ and their own correspondents have been expelled by the Chinese government.⁶⁸

In Hong Kong and Taiwan, English and Chinese-language **digital media start-ups** have become increasingly influential, providing a counterbalance to self-censorship among traditional media. Many such outlets are nonprofits or were founded by prominent print and television journalists who were concerned about encroaching China-related self-censorship; this background makes them less vulnerable to ownership changes that could curtail their editorial independence. Still, their experiments with funding models have had mixed results, and Hong Kong-based outlets are facing new threats since Beijing's imposition of a repressive National Security Law in the territory in June 2020.⁶⁹

The civil society sectors across several countries and regions have launched **new initiatives to monitor Chinese state media and other forms of CCP influence**. These include projects to support investigative journalism related to China, documentation of media narratives and social media activity by Chinese state outlets and diplomats, in-depth case studies of influence networks in various settings, and well-informed policy briefs offering concrete legislative, regulatory, and other solutions to decision makers.

Some of the most effective responses to problematic CCP media influence have been the result of cross-sector collaboration. For instance:

- A joint project by a data analysis firm and an investigative journalist produced a report on a Twitter bot manipulation campaign in Italy;⁷⁰
- The United Kingdom's media regulator, the Office of Communications (Ofcom), has investigated and found CGTN guilty of violating broadcasting rules, prompted by submissions from a British citizen and a European civil society group;⁷¹ and
- Taiwan's January 2020 general elections appear to have been less influenced by and vulnerable to Chinese state-linked disinformation campaigns than the November 2018 mayoral elections thanks to aggressive attention and efforts by Taiwanese government entities, international technology firms, and local civil society initiatives.

These actions have had some successes in curtailing problematic media investments, thwarting disinformation campaigns, increasing transparency, and shifting incentives in a direction less favorable to Beijing. Nevertheless, there remains enormous untapped potential for media development projects, journalism training and education, and broadcasting regulations aimed at protecting and enhancing media independence. These tools can and should be deployed more systematically to address the challenges posed by China's media influence. Indeed, many of the actions that would inoculate foreign media from CCP manipulation would also serve to protect them from other forms of malign influence—whether foreign or domestic—and generally improve a country's journalistic capacity and autonomy.



BUILDING RESILIENCE TO SHARP POWER ACROSS THE MEDIA ECOSYSTEM

Sector	Nongovernmental	Location	Details
	Response		
Media	Discontinuing paid advertorials	United States, United Kingdom	Several prominent U.S. and British news outlets discontinued some or all paid advertorial supplements from Chinese state media. The outlets include the <i>Telegraph</i> , the <i>Economist</i> , the <i>New York Times</i> , and the <i>Washington Post</i> . ⁷²
Media	Launching independent digital media start-ups	Taiwan, Hong Kong	Professional journalists, dissatisfied with growing self- censorship in mainstream media due to CCP influence, launched alternative digital news outlets like <i>Storm</i> <i>Media, New Talk, InMedia, Hong Kong Free Press,</i> and <i>Initium Media.</i>
Media	Rejecting paid content containing clearly defamatory disinformation	Argentina	At least three outlets refused a bid by a local intermediary for a Chinese agent to publish a questionable article that vilified local Falun Gong practitioners as a threat to public health during the COVID-19 pandemic. ⁷³
Media	Publishing in-depth reports on China's media influence in the local media market	Thailand, Sri Lanka	The <i>Thai Inquirer</i> and the <i>Colombo Gazette</i> published lengthy features on Xinhua and other Chinese state outlets' penetration of their respective local media markets. ⁷⁴
Media	Engaging in collective industry pushback	Ghana	The Ghanaian Independent Broadcasters Association issued a letter to regulators that voiced concerns about a potential US \$95 million contract with Beijing- based StarTimes to build Ghana's digital television infrastructure, urging the government to use local firms and protect the broadcast sector from content controls promoted by Beijing.
Media	Exposing Chinese embassy efforts to dictate local media coverage	India	An Indian journalist exposed a threatening Chinese embassy letter sent to 250 reporters that demanded adherence to Chinese government phrases when reporting on Taiwan's National Day, prompting broader pushback. ⁷⁵
Media	Publishing contextualized, objective reporting after being taken on Chinese government-sponsored tours in Xinjiang	Albania, Jordan	A journalist and a university lecturer from Muslim- majority countries were taken on tours of Xinjiang, including detention facilities, and investigated beyond the official Chinese government narrative, relaying descriptions of heavy security restrictions and closed mosques. ⁷⁶
Media	Submitting complaints to local redress mechanism for suspicious dismissal	Canada	An editor from the <i>Global Chinese Press</i> filed a complaint with the British Columbia Human Rights Tribunal over an apparent dismissal for actions that were disliked by Beijing. ⁷⁷
Media/Civil Society	Balancing opinion editorials published by Chinese diplomats	Chile	After China's ambassador published an op-ed in <i>El Mercurio</i> that attacked a Chilean legislator for visiting leaders of the democracy movement in Hong Kong, Fundación para el Progreso wrote a letter to the editor and helped Hong Kong activist Joshua Wong translate and place a response article. ⁷⁸
Media/Civil Society	Disinformation campaign detection and analysis	Italy, Serbia, Taiwan	Media and civil society groups— <i>Formiche</i> , ⁷⁹ Digital Forensics Center, ⁸⁰ and Doublethink Lab ⁸¹ —engaged in detection and forensic analysis of disinformation campaigns on Twitter, Facebook, and LINE.

Sector	Nongovernmental	Location	Details
	Response		
Media/Civil Society	Investigating content manipulation affecting foreign users of Chinese- owned social media applications	Indonesia, Germany, Canada, Global	Investigations revealed systematic content manipulation on ByteDance's short-video platform TikTok, ⁸² and on its news aggregator Baca Berita. ⁸³ Citizen Lab investigated politicized surveillance of WeChat posts by international users. ⁸⁴
Media/Civil Society	Surveying journalist unions and publishing recommendations from within the media sector	Global	The International Federation of Journalists conducted a survey of 58 journalists' unions around the world, revealing patterns in CCP influence tactics, and issued recommendations to journalists' unions and media owners. ⁸⁵
Civil Society	Submitting complaints to broadcasting regulator over violations by Chinese state media	United Kingdom	Safeguard Defenders launched a campaign to help victims of forced televised confessions that were aired in the United Kingdom file complaints, resulting in investigations and expected penalties against Chinese state media. ⁸⁶
Think Tank	Tracking and analyzing global social media influence and activity	United States, Global	The German Marshall Fund's Hamilton 2.0 Dashboard has aggregated Twitter, Facebook, and YouTube messaging by Chinese state media and diplomats, enabling documentation and analysis. ⁸⁷
Think Tank	Conducting content analysis related to Chinese media influence in designated countries	Czech Republic, Slovakia, Hungary, Poland	The MapInfluenCE project has provided content analysis on the quantity and tone of coverage on China in Central Europe; ⁸⁸ it also offers social network mapping of those setting the agenda for media discourse. ⁸⁹
Think Tank	Annual/recurring conferences on CCP influence in various countries and sectors, including media and technology	Czech Republic, Europe, Taiwan, Asia-Pacific	Sinopsis hosts an annual conference on "Mapping China's Footprint in the World." The 2020 gathering included papers on the Czech Republic, Estonia, Finland, Germany, Japan, Lithuania, Poland, Sweden, and Switzerland. ⁹⁰ Doublethink Lab also convened experts from the Asia-Pacific, Europe, and North America during its 2020 "China in the World Online Meeting."
Think Tank	Producing detailed policy brief on legislative and regulatory options for addressing hostile foreign media influence	Czech Republic	MapInfluenCE issued a policy brief with recommendations for the European Union on complex media regulation topics like investment screening, cross-ownership rules, broadcasting rules, and ownership transparency. ⁹¹
Tech	Labeling authoritarian state media content	United States, Global	Facebook and Twitter introduced labels to inform users that Chinese state media pages and posts are "Chinese state-funded" or "Chinese state-affiliated."
Tech	Restricting advertising rights for state media accounts	Twitter, Global	Twitter updated its advertising policy to bar "news media entities that are either financially or editorially controlled by the state" (including those based in China) from using the ad service. ⁹²
Tech	Detecting, dismantling, and publicly exposing disinformation campaigns	United States, Taiwan, Global	Facebook, Twitter, and YouTube removed inauthentic disinformation networks linked to China, publicly acknowledged the campaigns, and shared partial or complete datasets with researchers and journalists for analysis. ⁹³
Tech/Civil Society	Fact-checking disinformation	Taiwan	The LINE social media app created a fact-checking bot that users can insert in chats, with links to civil society fact-checking efforts. ⁹⁴

FUTURE OUTLOOK AND IDEAS FOR CIVIL SOCIETY

The global media landscape has undergone a quiet but notable change over the past decade. China and its ruling Communist Party have become integral players in media markets around the world, demonstrating repeatedly that no market is too small to warrant attention. This phenomenon continues to expand. Every democracy or semi-democratic system has a host of domestic concerns, challenges, and regulatory debates surrounding press and internet freedom. But today it is imperative that anyone engaged in the media space—be they journalists, regulators, technology firms, press freedom groups, or even news consumers—acknowledge the influence exerted by China's authoritarian regime on the news and information circulating in their print publications, radio broadcasts, television programs, and social media feeds. They need to be aware of the CCP's tactics, alert to the pitfalls inherent in media engagement and partnerships with Chinese state-run outlets, and prepared for the economic and political pressure they may face to adjust content or otherwise submit to pro-Beijing propaganda, disinformation, censorship, or self-censorship.

Hundreds of incidents that have occurred around the world over the past decade demonstrate that once the CCP gains a foothold within an information dissemination channel, manipulation efforts inevitably follow. Hundreds of incidents that have occurred around the world over the past decade demonstrate that once the CCP—or a company, media outlet, or owner with close ties to the party—gains a foothold within an information dissemination channel, manipulation efforts inevitably follow. This may not occur immediately, but can evolve over time or be activated as soon as a test case with sufficient significance to Beijing emerges. At that point, CCP leaders, diplomats, and other state-linked actors will not hesitate to use previously acquired economic and political leverage to impose their will.

The linguistic and topical reach of the CCP's media influence is expanding more deeply into the internal affairs of other societies, whether in terms of the lives of exiles and refugees, diaspora communities, investment deals, or electoral contests. As this expansion continues, the areas of daily life and policymaking within foreign democracies in which Beijing has a stake will grow commensurately, and with them the temptation for the CCP to push public debate in a desired direction.

The complexity of the modern media landscape is such that even when considering nongovernmental responses, the number of actors and industries involved is enormous. They include the media industry, particularly editors and owners, who are often more susceptible to economic coercion or political pressure to kill stories than are frontline reporters; technology firms, which are still grappling with the problem of how to manage state media accounts that have tens of millions of followers as well as emerging troll and bot networks that spread disinformation; scholars and researchers, who monitor, track, and expose media influence activities and disinformation campaigns; and press freedom groups, human rights advocates, and journalists' unions, which are an essential channel for influencing policy, training journalists, and raising awareness among media, governments, and the general public.

From this perspective, despite the recent increase in scattered activities to counter CCP media influence, one of the greatest needs is for **the "CCP factor" to be mainstreamed** into nongovernmental work related to protecting media and internet freedom. This could be accomplished as part of a broader initiative to address foreign authoritarian influence in the media sector and to enhance local resilience to such pressures, but China is by far the largest and most well-resourced actor in this space globally. In addition, particular tactics or avenues for insinuating content are specific to Beijing and therefore require focused awareness-raising efforts. The CCP

takes a whole-of-society approach to authoritarian control, and a whole-of-society response—as appropriate in a democratic polity—is necessary. This means robust civil society participation, supported by private and governmental donor agencies. In many cases, stronger societal responses to CCP sharp power in the media sphere will have the additional effect of building sturdier defenses against influence and interference from other authoritarian powers.

Such a comprehensive mainstreaming strategy should build on existing initiatives and include the following elements:

- **Investigation and research:** Academic institutions, think tanks, research entities, and their donors should not only continue existing work, but should also ensure that resources are available to monitor and expose CCP media influence activities in a credible, professional, sustained, and expanding way in the coming years. Special attention should be paid to preelection coverage and to Chinese-language media. As disinformation campaigns, globalizing Chinese-owned apps, and the acquisition of stakes in foreign local media by CCP-friendly tycoons become more common, future research should include identification of new disinformation tactics, rigorous censorship tests and security audits of relevant apps for Chinese-speaking and non-Chinese users outside China, and mapping of media ownership structures and any evidence of "corrosive capital" or individual owners' financial ties to the CCP. These types of activities increase transparency and alert the public and policymakers to emerging threats so that they can take necessary action in response.
- Action by media outlets: Local media should improve their awareness of the potential journalistic and political pitfalls of accepting Chinese state or proxy investment, paid supplements, and coproduction deals. Discontinuing paid advertorials and similar content-sharing arrangements would be best practice. If they opt to continue such partnerships, news outlets should ensure that the state-linked origin of the content is clear through labeling; include provisions in content-sharing agreements or partial ownership sales to protect editorial independence and an outlet's ability to publish content that Beijing might dislike; negotiate advertorial contracts to enable editorial review and the discretion to reject any promotional content that is deemed false, misleading, or harmful; and proactively publish replies or other opinion content to provide news consumers with a critical counterpoint to the regime-backed material. Local media can also explore how to incorporate issues of concern to the local population, such as environmental impact or corruption fears, when reporting on Beijing's infrastructure, financing, or investment projects in the country. Consortia of investigative journalists should consider how to report on tactics and manifestations of CCP influence across multiple countries. Revealing such patterns is important not only for informing responses from citizens and policymakers, but also for explaining in concrete terms the threat that this authoritarian regime and its practices pose to democracy. Journalists concerned about encroaching authoritarian influence at their own news outlets might consider launching digital media alternatives to counter self-censorship and diversify the information landscape. Donor agencies should support such initiatives and explore other ways of strengthening the financial sustainability of independent media that will also serve to reduce the allure of Chinese state media funding or free content.
- Initiatives by journalists' unions and media owner associations: Journalists' unions and media owner associations should themselves be wary of signing content-sharing partnerships and memoranda of understanding with the government-affiliated All-China Journalists Association or Chinese state-media entities. Per recommendations from the International Federation of Journalists,⁹⁵ unions should supplement or precede journalist trips to China with training on media influence tactics and common false or one-sided narratives, while facilitating encounters with victims of persecution from China. These industry associations can also play a role in enhancing journalistic codes of ethics by encouraging members to be transparent with news consumers regarding articles commissioned by PRC embassies, sponsored content, and sources of funds for journalist travel to China that result in published news items.



- **Civil society advocacy and programmatic work:** International and local press freedom groups should consider whether and how to incorporate a CCP media influence dimension into current or future projects, with support from private and government donors. Such projects could include work in the following areas:
 - Internal capacity building: This would involve improving knowledge of Beijing's media influence tactics and potential responses among existing staff based on experiences in other countries, through reviews of extant research, briefings from relevant local or foreign experts, and the assignment of staff to routinely track relevant developments as part of their portfolios.
 - Journalism training and education: Content related to CCP media influence should be incorporated into existing journalist training or educational programs at universities. This would help improve the sophistication of domestic reporting on China and counter or preempt the negative effects of Chinese government-sponsored trips to China. Units can provide brief overviews of broader topics related to China (like the structure of the PRC political system, the role of the CCP in Chinese politics, or meetings with victims of human rights violations in China), as well as topics specific to the media industry (such as the structure of Chinese state media, the role of the CCP's Propaganda Department, commonly censored topics in China and abroad, Beijing's methods of foreign media influence, and common foreign-facing narratives and counterpoints). Such training and awareness-raising activities should include not only journalists but also editors, management, and owners. These individuals are the ultimate decision makers at their outlets, with the ability to overrule journalists' efforts to report more aggressively about China, and are themselves a target of CCP outreach and cooptation efforts.
 - Media literacy and outreach to news consumers: In media markets where Beijing's influence is particularly strong, including in the Chinese diaspora community, broader media literacy campaigns should incorporate content related to CCP influence. For example, they should teach consumers how to identify Chinese state media such as Xinhua and their ties to the Chinese party-state, common and problematic CCP narratives, examples of past disinformation campaigns, media ownership structures, and Chinese-owned apps' track record of surveillance and censorship within China. The campaigns might also consider encouraging news consumers to pressure subscription-based news outlets to reject advertorials or content-sharing agreements with Chinese state media outlets. Other possible initiatives could include public awareness campaigns that fact-check common CCP narratives or information sharing through open channels that are impervious to manipulation. Such efforts should be undertaken with the goal of informing the public and enhancing access to information rather than engaging in tit-for-tat geopolitical competition.
 - Policy advocacy: Civil society can help lawmakers and regulators unpack the convergence of media, content, telecommunications, and data policy. Press freedom groups should produce reader-friendly policy briefs and engage in outreach to policymakers in order to improve the relevant legal and regulatory frameworks while preventing infringements on access to information, such as arbitrary or blanket bans on Chinese-owned mobile phone apps. Civil society groups can also file relevant complaints with regulators to prompt stronger oversight, where the necessary laws and institutions already exist. Advocacy goals could include regulatory scrutiny of Chinese state media outlets and associated individuals, laws that enhance transparency or screen investments, legal provisions that restrict cross-ownership to protect content dissemination channels, and strong data privacy protections. When engaging with policymakers, civil society groups should consistently reach out to individuals from across the political spectrum in order to minimize the perception that concerns about Beijing's influence are a partisan matter; this also helps to ensure that progress is sustained across future changes in government, and reduces the incentive for Beijing itself to favor one party over another.

- Information sharing and coordination: Local and international NGOs should identify avenues for cross-sector coordination and multistakeholder collaboration among government entities, technology firms, scholars and researchers, and civil society groups. Existing networks and conferences that often cover internet and media freedom issues—such as IFEX and RightsCon—should consistently incorporate panels and speakers on CCP media influence into their agendas. Such networks might also consider coordinating cross-country or global advocacy campaigns related to China's media influence, including at supranational institutions like the European Union, or creating a best-practices database that tracks successful initiatives to push back against CCP encroachment on foreign media environments.
- Technology sector response: Over the past two years, amid greater public attention on the lack of transparency surrounding Chinese (and other countries') state media on global social media platforms, as well as the emergence of PRC-linked disinformation campaigns, major technology firms have begun dedicating more time and resources to detecting manipulation, taking down accounts engaging in inauthentic behavior, and enhancing transparency for users. As these companies have taken action to counter disinformation by Russian, Iranian, and domestic actors in different countries, they have also moved to address China-linked manipulation. Technology firms should continue to seek opportunities to work with researchers and civil society in identifying emerging threats and problematic accounts tied to the Chinese party-state. They must also ensure that independent voices as well as activists and content producers who are critical of the PRC government have a clear avenue for appeal if they encounter problems on the companies' platforms, either because of innocent errors on their part, flawed content-moderation decisions, or false and malicious reporting by pro-Beijing trolls of alleged terms-of-service violations.

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