CCOA | Coalition to Counter Online Antisemitism

ISD | Powering solutions to extremism, hate and disinformation

Mainstreaming Digital Human Rights

A pan-European policy roadmap to combat online antisemitism

About this paper

The Coalition to Counter Online Antisemitism (CCOA) is a pan-European network uniting research, policy and education experts at the intersection of countering antisemitism and digital harms to share knowledge and best practice to counter antisemitism on social media.

CCOA is an independent project supported by Google.org.

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Executive Summary

Since long before the October 7 attacks, Jewish communities in Europe have experienced growing hate, harassment and hostility on social media. This policy paper articulates the key challenges of online antisemitism, and provides comprehensive and practical policy steps which governments, platforms, regulators and civil society organisations can take to address them. Built through 42 interviews with Jewish organisations and experts in antisemitism and digital policy from across CCOA's five geographies (France, Germany, Italy, Poland and Sweden), it collates local experiences and channels them into a cohesive pan-European strategy, uniting communities and sectors in joint responses.

Interviewees identified five central challenges with online antisemitism:

- Jewish communities and organisations across the five geographies report the significant behavioural, social and psychological impacts of online antisemitism, which have created a chilling effect on participation in public life.
- Concerns exist not just over fringe violent extremist content, but the prevailing normalisation of mainstream antisemitism and a permissive culture which facilitates its spread across all areas of society.
- There are a wide range of social media platforms in the social media ecosystem each adopting distinctive approaches and standards to content moderation, however the widespread accessibility of antisemitism suggest that significant barriers remain to the effective implementation of Terms of Service, and that many platforms are failing in this regard.
- There is limited awareness and understanding of the Digital Services Act (DSA) in Jewish civil society, little capacity to implement it, and a lack of confidence in its efficacy in addressing antisemitism.
- Law enforcement has lacked both the capacity and legislative tools to effectively respond to the scale of illegal activity on social media.

This policy paper presents policy recommendations for Governments, Tech Platforms, Digital Regulators, and Civil Society. These approaches constitute a collective pathway, but may be diversely applicable across different geographies, communities and jurisdictions:

Governments should:

- Support civil society through investment in evidence-based initiatives to mitigate the impact of online antisemitism, providing resource for antisemitism monitoring bodies and building awareness of and capacity around the Digital Services Act.
- Update the formal education curriculum to include mandatory material on contemporary antisemitism, online harms and Jewish life, and roll out complementary educational programming across all segments of the population.
- Build inter-departmental working groups on online antisemitism to ensure cross-government cohesion, including streamlining national antisemitism strategies with digital regulation both within and between governments.
- Bolster legislative and law enforcement responses by reviewing enforcement gaps in addressing online hate and building capacity among law enforcement to identify and respond to online antisemitism.

Civil society should:

- Build resilience and strategic capacity within Jewish communities to detect, report, and respond to online antisemitism, ensuring inclusion of smaller communities.
- Develop and evaluate strategic prevention and intervention programs to counter online antisemitism.
- Facilitate knowledge exchange between digital policy and antisemitism experts to integrate specialised expertise into prevention and response efforts while fostering solidarity across civil society.

Platforms should:

- Fully implement platform Terms of Service and DSA requirements, including robust responses to illegal content and swift action against repeat offenders, as well as measures like downranking 'grey area content' to mitigate harm.
- Enhance transparency of recommender and moderation algorithms, including disaggregated data on hate speech forms, and enable independent third-party scrutiny for better oversight.
- Strengthen moderation systems through improved training on antisemitism for both human moderators and algorithm developers, while scaling moderation teams to match regional and linguistic needs.
- Improve user and organisational support by simplifying reporting mechanisms with a trauma-informed lens, providing detailed feedback on flagged content, and ensuring accessibility of staff for local organisations.
- Collaborate with civil society and local organisations to integrate expertise, ensuring informed, culturally sensitive moderation efforts.

Regulators should:

- Ensure robust responses to illegal content and repeat offenders to deter persistent harmful behaviours.
- Strengthen civil society's capacity to engage in trusted flagger activities under the DSA, ensuring suitable trusted flaggers are identified and protected from retaliation.
- Expand moderation and risk assessments to include additional EU languages like Turkish, Arabic, and Russian.

Introduction

Across geographies, platforms, languages and digital ecosystems, online antisemitism remains a prevalent and deepening crisis. Social media platforms facilitate the spread of such hatred, impacting Jewish communities across the globe by eroding rights and freedoms, creating a chilling effect and fear within communities, and contributing to real world violence.

How deeply antisemitic narratives are rooted in society becomes evident when looking at mainstream and fringe online platforms. It is not confined to extremist actors but also manifests within the political mainstream, making it even more challenging to address effectively. ISD found that incidents like the COVID-19 pandemic and the Russian war on Ukraine can be linked with a rise in antisemitic conspiracy narratives and hate in the online space. After the Hamas attack on October 7, 2023, antisemitic hate speech in the digital space spiked significantly across Europe. Accordingly, ISD evidenced a 51-fold increase in English-language antisemitic comments on YouTube videos about the conflict.

Jewish communities across Europe have raised particular concern over the spread of antisemitism on social media. From October 7 to November 9, 2023, ten out of eleven antisemitic threats online in Germany were violent, included extermination fantasies, or even featured death threats. Similarly, in a recent survey, 63% of Jewish people in Sweden reported that they encounter online antisemitism all the time. Due to the threat of online hate, 32% avoid posting content online that could identify them as Jewish.

Online antisemitism manifests in a variety of forms: it can appear as text, images, videos, audio and AI-generated content. It persists through the spread of conspiracy narratives, Holocaust denial and distortion and the expressions of hatred or incitement to violence. The diversity of hate renders it difficult to monitor and mitigate, as antisemitic content spreads through different formats and platforms, reaching more people in complex ways. Especially with the vast circulation of images and videos showing the violent acts committed by Hamas, these visuals can be reproduced indefinitely online. The constant sharing and widespread availability of these graphic materials significantly amplify and normalise antisemitic narratives, extending their impact beyond Israel to confront Jewish communities globally.

The alarming rise in antisemitism, particularly in online spaces, highlights the need for a comprehensive policy approach to effectively combat this growing issue. Across Europe, countries are responding to this challenge with a variety of political and legal measures, including the important development of national strategies on antisemitism. The emerging implementation of the Digital Services Act (DSA) marks a step forward in holding platforms accountable for online hate and antisemitism. Civil society organisations have, however, identified gaps in national strategies which have in some cases overlooked the complexity of the online space, and do not line up with DSA implementation. In this context, many Jewish individuals remain dissatisfied with how platforms handle their complaints of online hate; polling by the EU Fundamental Rights Agency reveals 60% of those who reported their most recent experience of antisemitic content online were highly dissatisfied with the platform's response. The EU Strategy on Combating Antisemitism and Fostering Jewish Life (2021-2030) also highlights specific digital priorities for tackling online antisemitism EU-wide. Considering ongoing discussions about the skills and capacities required within Jewish advocacy and community organisations, this policy roadmap aims to address these needs.

The CCOA policy roadmap offers a detailed overview of the trends in manifestations and challenges of online antisemitism in France, Germany, Italy, Poland and Sweden. Based on 42 interviews with experts in antisemitism and digital policy across five countries, commissioned by local consultants, it lays the groundwork for more coordinated efforts to counter online antisemitism.

Building a grassroots evidence basis

To gather local knowledge, consultants in each of CCOA's five countries (France, Germany, Italy, Poland and Sweden) were commissioned to conduct interviews with national experts on online hate, antisemitism and digital policy.

Consultants identified key organisations and individuals to interview through a combination of existing stakeholder relationships and desk research. A total of 42 semi-structured interviews and roundtables were conducted in order to gather inductive insights across a range of topics most relevant to the interviewees. Initial topics for questioning were suggested by the CCOA team and agreed upon by consultants, who then conducted a snowball questioning methodology. As well as an introductory session, two check-in sessions were held to allow consultants to mutually troubleshoot and hear insights from parallel processes in different geographies. Interview notes were summarised by consultants, and the CCOA team synthesised findings across interview using thematic analysis. A calibration meeting was held with all consultants to validate themes and add final insights. Discussion from throughout CCOA's 2024 conference was additionally integrated.

CCOA would also like to acknowledge the significant local expertise and experience which research participants kindly shared, which informs the body of this policy paper. This policy report gathers themes across 42 participant interviews, and the content of the report does not necessarily reflect the diverse individual views of each interviewee. Similarly, interview participants do not necessarily reflect the views of their organisations or ISD.

We are hugely grateful to research participants who gave their time for interviews, both those preferring to remain anonymous and those on the record, including:

France	Germany	Italy	Poland	Sweden
Anthony Bem, Organisation Juive Europeanne	Analyst at Bundesverband der Recherche und Informationsstellen Antisemitismus (RIAS)	Murilo Cambruzzi, Osservatorio antisemitismo	Professor Alina Cała, Historian of antisemitism	Jewish Youth Association Sweden
Fabrice Boucobza, Observatoire Juif de France	Pia Lamberty, Center für Monitoring, Analyse und Strategie (CeMAS)	Vincenzo Caruso, Lev Cadash Milano	Przemyław Wiszniewski, Otwarta Rzeczpospolita	Swedish Committee Against Antisemitism
Jean-Michel Zakine, Balance ton Antisémite	Karolin Schwarz, democ.	Andrea Voghera, Unione Giovani Ebrei d'Italia (UGEI)	Michał Bilewicz, Centrum Badań nad Uprzedzeniami	Living History Forum
Lucile Petit, Arcom	Amadeu Antonio Stiftung	International Project Manager for Young Jewish People in Italy	Patrycja Anna Tepper, Instytut Zachodni	Swedish Police Authority, National Operations Department
Miko, Tous 7 Octobre	Marlene Schönberger and Monty Ott	A member of the Firenze Jewish Community	Social Initiative Fighting Against Antisemitism, SITWA	The Segerstedt Institute (University of Gothenburg)
Rudy Reichstadt, Conspiracy Watch	OFEK	Aharon Ferrari, member of the Jewish community in Verona	Anna Zielińska, Czulent	Institute for Law and the Internet
Samuel Athlan, Sur Ma Vie	Irina Rosensaft, Zentralwohlfahrtsstelle der Juden in Deutschland (ZWST)	Noemi Cohen, Jewish community representative in Florence	Roundtable of community leaders and representatives	Judiskt Upprop
Shani Boualid, Délégation interministérielle à la lutte contre le racisme, l'antisémitisme et la haine anti-LGBT (DILCRAH)		Daniel Heller, CEJI		
Robert Ejnes, Conseil Représentatif des Institutions Juives de France (CRIF)		Daniele Napoli, Jewish community security in Napoli		

The online threat landscape

Even before the wave of online antisemitism triggered by the October 7 attacks, Jewish communities in Europe reported deteriorating experiences of online hate. The vast majority (90%) of the respondents of the Fundamental Rights Agency (FRA) poll of European Jewish communities reported experiencing online antisemitism. A comprehensive qualitative analysis of online antisemitism by EXPO Foundation, HOPE not Hate and Amadeu Antonio Stiftung emphasises its sheer prevalence across nine platforms, including Facebook, 4chan and Parler.

Interviewed experts reported a shift of tone and medium, stressing the importance of social media platforms for the proliferation of antisemitism embedded into conspiracy narratives, anti-colonial rhetoric, and anti-capitalist narratives. As well as creating new ideas, platforms amplify existing antisemitic rhetoric through new lenses, capitalising on contemporary crises.

Experts expressed concern with online antisemitism, coupled with an atmosphere of impunity, is beginning to normalise offline hostility, specifically after October 7. Opposition to Israeli government activity, including the current war in Gaza and Lebanon, is by no means antisemitic. However, it has in some cases paved the way for expressions of antisemitism which mask themselves as purely anti-Israel. This can, in context, include the application of classically antisemitic conspiracy narratives to Israel, the essentialisation of global Jewry in line with the actions of a foreign government, and denial of Jewish self-determination where other minorities are afforded such rights. Social media enhances this dynamic by allowing antisemitic actors to easily spread disinformation and hate towards Jews and Israel. Interviewees reported the constant presence of antisemitic sentiment which negatively affects Jewish people's daily interaction. October 7 led to the antisemitic "background noise" to become more overt and coded, making use of old conspiracy narratives. These imply a general suspicion of Jews, using codes like "globalists" and "Zionists" and ultimately lead to conspiracy narratives about media control. This is further used to pit vulnerable groups against each other by relativising antisemitism in relation to the war in Gaza. Old patterns are fused with new strategies that constantly adapt to societal developments. One expert recounts October 7 as the biggest wave of disinformation and propaganda ever recorded with malicious actors exploiting it effectively.

Interviewees recounted that the most common narratives online are reproducing antisemitic stereotypes, often even unconsciously and out of ignorance. One Polish organisation identified that after October 7, antisemitic attacks online have also become more personal. The narratives spread by these groups are particularly appealing to young audiences, offering a sense of purpose, community and identity through a supposed "human rights defence" perspective. This perspective criminalises any expression of Zionism and frames the dehumanisation of Jews and Israel as "anti-fascism", "anti-racism" and "resistance", often drawing comparisons between Israel and Nazi Germany.

The depiction of terrorism and violence has become more prevalent. Jewish people navigating the digital space experience an increased mental strain and a feeling of despair. Many do not feel safe expressing their opinions and retreat from online discussions in reaction to the received threats. This is leading to Jewish people feeling alienated from society, threatening human rights and eroding democracy both in the digital and offline spaces. Platforms are seen as lacking the understanding and capacity to detect and counter the antisemitic content.

In France, despite polling suggesting that a wide section of society recognises the problem of antisemitism, local organisations report little substantive action. The Counseil Représentatif des Intitutions Juives de France (CRIF) recorded incidents jumping from 436 in 2022 to 1,676 in 2023, with the vast majority occurring post October 7. Polling from the EU Survey on Jewish People shows 90% of the respondents saw antisemitism as a significant problem already before October 7, with 95% encountering it in their daily life. 64% have encountered online antisemitism with a third of the respondents worrying about their physical safety and changing their behaviour online.

The FRA's EU Survey of Jewish People in Sweden from 2024 shows that 81% of Jews in Sweden considered antisemitism to be a significant problem in their lives already before October 7, with 82% believing that it got worse in the past 5 years. Nearly all respondents (99%) reported encountering antisemitism in their daily lives,

with 63% experiencing it specifically online. As a result, around one third of Swedish respondents have changed their behaviour online by engaging less or concealing their religion. A study by the Segerstedtinstitutet at Gothenburg University on antisemitism after October 7 concludes that while there might be little public acceptance for overt antisemitic beliefs in Sweden, age-old antisemitic conspiracy narratives still linger and are easily activated. This was also confirmed by interviews with local experts, highlighting the coded character of these antisemitic narratives, specifically in connection to the war in Gaza. The Segerstedtinstitutet report confirms a sense of betrayal and increasing rift in civil society, as Jewish organisations are left to fight on their own. Where previously there had been trust by Jewish organisations that Swedish society would protect them, now there is an increase of distrust, exacerbated by the attacks and the aftermath of October 7.

Similar trends were reported by German interviewees, with 96% of local EU survey respondents encountering online antisemitism in their daily lives. Between October 7 and December 31 2023, 2,249 cases of antisemitic hate crime were reported to the German Federal Criminal Police Office (BKA), over half the number of cases recorded throughout the whole year. Local communities felt that antisemitism thrived in online spaces where the barrier to entry for promoting hatred is significantly lower than it is offline. Antisemitism monitoring organisation RIAS similarly notes a "new everyday life", with German Jewish communities experiencing a "turning point" in balancing visibility and security. The 12th antisemitism report by Amadeu Antonio Foundation from 2024 shows a dramatic deterioration of the situation for Jews in Germany.

A complementary review of antisemitic incidents in Poland by local Jewish association Czulent estimated a 82.5% increase in reported incidents compared between 2022 and 2023 including an almost doubling of online reports. The report by Czulent concludes that antisemitism in Poland manifests in various forms and environments. Antisemitism had further been used in election campaigns in 2023 which had direct influence on the increase of case numbers.

The FRA country data for Italy shows similar results to Poland: 98% of respondents had encountered antisemitism in their daily life and 74% recognised it as a significant problem before October 7. Among the five countries, Italian respondents reported the highest exposure to online antisemitism at 70%, yet only 24% said they had limited their online participation as a result. The Osservatorio Antisemitismo manually collected over 3.500 screenshots of antisemitic content in 2023. Similarly, analysis of a large dataset of Italian-language Jewish-related tweets in January 2023 by VOX found that 98% (38,329) were negative. After October 7, the Observatory for Security against Discriminatory Acts of the Ministry of the Interior observed a quadrupling of antisemitic hate speech compared to the previous period. Young Italian Jews in particular noted a sense of insecurity, as UGEI's 2024 report highlights. 83% of young Jews have noticed an increase in antisemitism after October 7, with one in two having been either a victim or witness of an antisemitic incident.

Across all five CCOA geographies, local incident reporting data, polling and expert interviews alike confirm a deepening crisis. The often unmitigated spread of online antisemitism impacts the ability of Jewish people to fully participate in society, and as such their rights and freedoms. Such crises erode the strength of democracy for all European citizens. The universality of trends in volumes, narratives and modes of online antisemitism pave the way and need for a European-wide response.

Challenges in responding to online antisemitism

Against the backdrop of rising antisemitism, interviews with local experts and community representatives emphasised five key challenges in the current response mechanisms.

Communities report visceral behavioural and psychological impacts of online antisemitism

For many years - through multiple Middle East conflicts, the COVID pandemic and Russia's full-scale invasion of Ukraine – Jewish communities across Europe have reported the impacts of the spread of antisemitism on social media. However, since October 7, communities have recounted even stronger changes in online behaviours as a result of experiences or fear of online antisemitism.

Many Jewish community organisations consulted in this research described online harassment and abuse, sometimes of overwhelming volumes. One French activist reported around 30 death threats in the last eight months. Jewish organisations who have other purposes than combating antisemitism have struggled to balance their regular functioning with the risks of abuse, eroding regular communal life.

Communities from all five countries reported the large-scale change of behaviours adopted by Jewish people to have to mitigate this increasing risk, including limiting personal information shared, avoiding certain spaces or topics of discussion, reducing Jewish visibility or deleting social media accounts. A round table of young Jewish activists in Poland recounted withdrawal from public life both online and offline, while a Jewish youth group in Italy reported being forced to shut down their "Ask a Jew" TikTok page due to the overwhelming volume of hate. Jewish activists in Germany reported harassment campaigns, slurs, graphic threats, doxing and smear campaigns, deterring others from visible roles in advocacy. Young Jewish people in particular describe immediate changes to their social life after October 7th, including a necessary re-evaluation of friendships.

This exists not just as a reality but an ongoing source of anxiety, where trauma and fear often drive actions more than the threat landscape itself. This inability to participate in regular public life due to Jewish identity represents a chilling effect in real time. Intentional spread of fear and isolation is a well-trodden extremist tactic, common across all forms of hate targeted at diverse communities.

As well as behavioural differences, Jewish communities reported the psychological toll, including heightened fear, isolation and anxiety. One organisation reported instances of self-harm because of receiving online hate. These impacts have been elevated in smaller communities with fewer support structures.

The dominance of antisemitism in online discourse has also re-shaped the internal cohesion of Jewish communities. A Jewish group in Sweden which publicly opposes Israel's war in Gaza spoke of feelings of exclusion from the wider Jewish life. For sections of the Jewish community who feel rejected both by the community's established structures due to opposition to Israel's military actions, and by the left-wing anti-war movement due to antisemitism, feelings of isolation are compounded. Mainstream Jewish communities have also noted how some right-wing segments are being wooed by the radical right's pro-Israel and anti-Muslim rhetoric. The dominance of antisemitism in experiences and perceptions of Jewish life are such that Jewish tradition, practice and identity in the post-October 7 era have shifted.

The levels of both fear and anger emanating from Jewish communities in Europe is palpable and should be instructive to platforms and governments in their response.

Social media has facilitated the normalisation and mainstreaming of antisemitic discourse

Universal among interviewees was the strength of concern over the role of social media in creating a permissive culture for the spread of antisemitic attitudes. This encompasses both the spread and visibility of overtly extremist ideas such as Holocaust denial, neo-Nazism and white supremacism, and an increasingly deep-rooted public hostility towards Jews. With reference to the post October 7 landscape, antisemitism experts identified a subtle mainstreaming of antisemitism and antisemitic narratives which is increasingly tolerated by a society which considers itself anti-racist. A French Jewish activist notes "the gradual acceptance of antisemitism, legitimised or even encouraged by certain political figures or leaders in civil society". Social media has afforded larger audiences to antisemitic narratives and

eroded their taboo. A civil society organisation in Poland describes a transnational atmosphere so tense that "if you threw a lit match, everything would explode".

Many respondents spoke of their perceived isolation from civil society, including feelings of betrayal from either the silence or complicity of some anti-racist spaces. One Polish activist recounted how Jews are pushed out of supposed anti-discrimination spaces. Another, herself a member of the LGBTQ+ community, expressed her "gigantic disappointment" at the hostility towards her in LGBTQ+ spaces, commenting that "I would never have thought in my life that people who are a minority themselves would so willingly join the majority, hostile attitudes towards Jews". Similarly, a French Jewish organisation had to be removed from a feminist space due to hate and physical threats. This trend not only strongly undermines community cohesion and principles of allyship, but withdrawal from public life further serves to undermine open dialogue and the exchange of ideas.

In turn, this sense of impunity on social media has emboldened offline antisemitic activity. Respondents in Germany spoke about a violent attack in February 2024 against a student at Freie Universität Berlin, which followed months of online harassment. After the assault, the victim was blamed on social media as a 'provocateur'. French interviewees referred to the case of the antisemitically-motivated rape of a 12-year-old Jewish girl in Paris. Multiple experts in Italy reported "sticker wars" where memes were printed and stickered in the streets, directly referencing the online space.

These universal European experiences emphasise the transnationalisation of online hate, where users share ideas and tactics across borders. Cross-border influence campaigns by hostile state actors have stoked tension among European communities, while far-right networks have mobilised extreme violence on online ecosystems. The emergence of generative AI only serves to compound concerns of the creation of highly spreadable antisemitic content, cementing online ecosystems which use antisemitism not just as an ideology but an aesthetic.

In the context of significant mainstreaming, where civil society organisation increasingly fear that antisemitism is seen as politically acceptable or even desirable, they lament a widespread lack of knowledge on the narrative and systems of antisemitism.

Platforms have failed to effectively respond to antisemitic content

Jewish communities across Europe have recounted the systematic failures of mainstream social media platforms to enforce their own terms of service and moderate antisemitic content. These issues are multifaceted, from failure to proactively and comprehensively remove overtly antisemitic content, to unresponsiveness to well-founded content flags. It includes the re-instatement of antisemitic accounts and the algorithmic amplification of antisemitic content. There is diversity in platforms' approaches across the sector; while some invest thoughtfully in Trust and Safety infrastructure, others are stripping it back or simply do not have the necessary internal capacities.

The pace at which trends in evading content moderation evolve, including through coded or covert language, is so rapid that platforms have often struggled to keep up. In this way, even when the most overt language is moderated effectively, such efforts barely make a dent in the overall hate landscape. There remains a significant dearth of understanding in civil society and academia of the covert and conspiratorial narratives which serve to mainstream antisemitism.

Platform policies have been challenged by the fuzzy line between antisemitism and anti-Zionism, having to account for political and identity factors. In recognition of these challenges, following a consultation process, Meta adapted its hate speech policy to account for when the term "Zionist" is used as a proxy to refer to Jews or Israelis in a dehumanising or conspiratorial manner. It is not known the efficacy or impact of the policy change in reducing antisemitism while protecting political criticism, or whether other platforms plan to follow suit.

Multiple organisations spoke of the inefficacy of content reporting systems, often with specific reference to X. The November 2023 transparency reporting obligations reveal only 343 account suspensions on X for any form of hate conduct in response to user reports over a two-month period. Trust and safety policies are not upheld, and a range of platforms are minimal in their communication to flaggers of the rationale behind their decisions. A German civil society organisation raised concern over the arbitrary and inconsistent nature of decision-making processes, such as Meta's handling of Holocaust denial.

Concern also exists over poor linguistic expertise of platform moderations, rendering some geographies more covered than others. The November 2023 transparency reports reveal that, across all online harms, X employs 81 German, 52 French, 2 Italian and 1 Polish

primary language moderators. There were no reported moderators with Sweden as their primary language. Of the 2,294 English language moderators, it is unknown how many are EU-based and have familiarity with local context or linguistic codes.

This lack of trust in obtaining positive outcomes or any kind of responses or explanation has led many communities across Europe to stop flagging antisemitic content. Community members also highlight the complexity and confusing nature of reporting structures, where civil society often does not have the time or knowledge to wade through the process. An analyst from German antisemitism monitoring organisation RIAS notes how the NetzDG (Network Enforcement Act preceding the adoption of the DSA) has shown how requiring users to make legal assessments deterred reporting.

A significant number of organisations reported being unable to flag the sheer volume of content necessary to make any impact on the toxicity of the ecosystem. Rather than focusing on individual pieces of content and with limited capacity, they see more value in upstream prevention measures such as education. One civil society organisation in Germany suggested that such flagging mechanisms only serve to outsource responsibility and capacity to communities rather than themselves sufficiently integrate protective measures.

Lack of transparency and recourse measures were also an obstacle for a young Jewish organisation in Sweden when a TikTok account was created in their name which produced hateful and misleading content. They were unable to get the account blocked through the moderation system or to contact a staff member who could assist them.

Failures in transparency, including shuttering of data access for researchers, render the online environment opaque and unaccountable. Civil society remains in the dark about platform systems, training of moderators and algorithms, and have very little recourse to comprehensive analysis.

Against this backdrop, some mainstream social media platforms have dismantled trust and safety teams, further reducing their capacity to respond. For platform systems reliant on community reporting to be effective, they must demonstrate that they are worthy of the time and experiences of those receiving hate on their platforms.

Meanwhile, smaller and high-risk services where extremist ecosystems proliferate - such as Telegram and 4chan – as well as end-to-end encrypted services – such as WhatsApp – evade scrutiny. Significant concern exists on the cross-platform ecosystem which facilitates the flow of antisemitic ideas from extremist networks on fringe platforms into the mainstream.

Concerns exist over the ability of the Digital Services Act to effect change

The EU Digital Services Act (DSA), the emergence of a European regulatory framework for social media, has received a mixed welcome from antisemitism experts. Many Jewish community organisations, who had looked to the DSA as one of very few potential solutions to the proliferation of antisemitism in the online space, reported their disappointment and frustration in a lack of substantive changes since its implementation.

Conversely, regulatory bodies and some digital policy experts stated their continued belief in the opportunities provided by the DSA, while calling for patience in its inception phase. Regulators identified how DSA enforcement has been hampered by structural changes required for compliance, and trusted flagger applications are still under review. However, there exists a lack of confidence across many Jewish communities in the ability of the DSA to deliver necessary changes.

Only a small intersection exists of organisations with expertise across antisemitism and DSA implementation. The antisemitism and digital policy sectors are often siloed, leading to little expertise on the specific manifestations and structures of antisemitism and insufficient attention towards antisemitism in public policy. Across the wider Jewish community, there exists a range in awareness of the DSA, with most organisations working on antisemitism having very minimal engagement with the process. This lack of awareness will also serve to impact delivery of the DSA where it relies upon user reporting. Attaining trusted flagger status under the DSA require both quality and quantity of reporting, requiring significant resource and capacity.

Many interviewees identified that the scope of the DSA does not fully cover online antisemitism where it is not specifically illegal. In this regard, the DSA is only as strong as national legislation allows it to be. While research participants are hoping for systems-level impact, they are broadly pessimistic about its ability to respond to the large volumes of covert or conspiratorial antisemitic content which they face on a daily basis. In Sweden, a researcher at The Institute for Law and the Internet explained how the DSA can be more effectively applied to combat antisemitism, following the revision of national legislation on incitement to include denial or denigration of the Holocaust. This shows how national legislation processes can impact DSA scope.

The scope of the DSA is also seen as unclear with regard to which services will be included. The restriction in the definition of "hosting services including online platforms" leaves open questions around the role of online gaming servers, for example.

As well as addressing these questions, the DSA will need to reckon with the crisis in confidence and capacity in civil society to use the mechanisms it provides.

Law enforcement responses struggle to address the sheer scale of the issue

Jewish communities across different geographies reported diverse experiences of law enforcement responses to online antisemitism. For example, some communities in Italy found the local police cooperative, approachable and willing to intervene when necessary. Others in Italy and across Europe found that their concerns were not taken seriously, and that even when they were, police officers did not have the necessary knowledge, information or above all, resource, to act.

Diversity in legislation and sentencing guidelines across European countries generate differing penalties for online hate speech. Despite this, many organisations agreed that the current judicial process is unable to impose sufficient deterrence to the most egregious forms of online hate. While improvements are noted and legislation is beginning to catch up, Anthony Bem from the Organisation Juive Europeanne articulated that "the awakening is late, and we're facing a tidal wave". There is frustration over the disconnect between law enforcement's focus on terrorist and violent antisemitism, and the huge wave of mainstream hate that communities experience every day, including harassment and hate speech.

Even where a robust legal framework exists, the sheer scale of online hate renders criminal justice responses a game of whack-a-mole. When accounts which post antisemitic content are taken down, they merely create new accounts or do so anonymously, resulting in drastically hindered prosecutorial efforts. While good will and understanding are often apparent among law enforcement, a simple lack of capacity leaves police forced to prioritise more urgent matters.

Concerns also exist regarding gaps in law enforcement knowledge and educational training around online antisemitism. This has left law enforcement often unable to identify illegal harms, leading to large volumes of content to remain unprosecuted. Where law enforcement is not seen to be taken sufficient action, community trust in authorities and recourse processes has dwindled.

Towards a holistic policy strategy to address online antisemitism

A multifaceted range of responses emerge from interviews with local communities and experts, from upstream prevention to downstream response. Bespoke and targeted policies should seek to address the diversity in manifestations of antisemitism, including mainstream conspiracies and violent extremist narratives.

From a prevention perspective, a holistic strategy should align with the lifecycle of response against the Public Health model; an emerging approach to violence prevention which draws from disease prevention strategies. This multi-layered approach uses different mechanisms to build societal resilience to antisemitism, inoculate individuals against antisemitic narratives, disrupt the emergence of antisemitism, and provide direct intervention to mitigate the impacts of antisemitism.

These policy recommendations are designed to respond to systemic issues on social media platforms which serve to facilitate the spread of online antisemitism. Addressing governments, platforms, regulators and civil society, these concrete suggestions provide pathways for cross-sectoral collaboration. While they bring together a cohesive policy vision, they may be of diverse relevance and feasibility to different geographies, jurisdictions and communities. In response to the urgency and scale of the concerns raised by European Jewish communities, these solutions aim to mitigate the severe impacts of antisemitism and provide the necessary building blocks to prevent further harm.

For governments:

Support civil society

Invest in initiatives to mitigate the impact of online antisemitism

Support should be made available to mitigate the severe impacts of antisemitism on social media. This could include resilience-building initiatives such as responsive counselling to offer practical assistance and comfort to impacted communities, such as programming run by Italian Jewish representative organisation Unione Giovani Ebrei d'Italia.

Support for, and regular communication with, antisemitism monitoring bodies

To date, the burden of systematic monitoring of antisemitism, both online and offline, has fallen on communities. While community integration and trust of monitoring bodies remains vital, governments could look to provide greater support and resource for such organisations, as well as opening regular communication channels to facilitate the flagging of dangerous content to relevant bodies and authorities. The European Network on Monitoring Antisemitism (ENMA) offers an example of best practice for the standardisation of data collection across languages. The opportunities provided by social media to deliver educational programming and interventions to otherwise hard-to-reach audiences should continue to be leveraged in line with this response framework.

Build civil society capacity and engagement with the DSA

Given the reported lack of awareness of the DSA, understanding of the vital role civil society can and should play in its implementation (see below), and trust of its ability to reduce antisemitism, governments could play a key role in building capacity in civil society and acting as an interlocutor. The financial burden of participation in the DSA's platform accountability structures should not fall on Jewish communities or CSOs.

Reform education

Update the formal education curriculum to include mandatory material on contemporary antisemitism, online harms and Jewish life

While curricula on the Holocaust have been widespread and successful, it has become clear that they do not go far enough to address the contemporary manifestations of antisemitism, which vastly differ from those of the 1930s and 1940s. Educational resources should not only teach how to recognise antisemitic content but also help understand the strategic toolbox which harmful online actors use to manipulate users. Additionally, teaching about the Israel-Palestine conflict comprehensively and sensitively could mitigate the negative impacts of antisemitic mis- and disinformation.

Roll out impactful antisemitism education and digital literacy programmes for all segments of the population

In addition to utilising school curricula as a means of educating children, government should also consider opportunities for widescale antisemitism and digital literacy efforts for the wider population to inoculate against harmful narratives and prevent the mainstreaming of extremism. This could include funding civil society to pursue awareness campaigns or working with businesses to access adult populations.

Streamline intra-government strategies

Build inter-departmental working groups

While excellent work is conducted, it often remains siloed and does not integrate all the necessary departments needed to address current manifestations of and pathways into antisemitism. Government should look to foster more dialogue and synergies between departments through working groups, including internal affairs, foreign affairs, education, local communities, national security and social care, among others. Such structures should be mirrored within local authorities.

Streamline departmental strategies

In additional to regular dialogue, governments should look to unify the relevant sections of departmental strategies, including national security, digital regulation, social cohesion and education. This could include the development of specific national strategies to address online antisemitism, as demonstrated by Austria.

Foster inter-governmental synergies

Given the transnational nature of online hate, where users share ideas and strategies globally, governments must look to build synergies, including cohesive understandings of the threat landscape, legislation, and regulatory response. Knowledge and data sharing should be encouraged in line with privacy and data protection regulations.

Bolster legislative and law enforcement responses

Review enforcement gaps in addressing online hate

Enforcement of legislation against offline hate crime is often stronger than online, which struggles to keep up with the pace of change of online systems, including AI. Governments should seek to understand any potential gaps in online hate legislation and its enforcement, and address them accordingly. Beyond the DSA, the full toolbox of responses should be engaged to tackle online antisemitism, including effective enforcement of Terrorist Content Online (TCO) obligations.

Build capacity among law enforcement to identify and respond to online antisemitism

Where legal tools against online antisemitism do exist, an educational gap caused by ineffective knowledge transfer from research to law results in their widespread underuse. The under-resourcing which has forced law enforcement to de-prioritise online hate should be addressed, while ensuring proactive prioritisation of the most egregious activity, including from large accounts or repeat offenders. Communities urge for a more proactive approach from law enforcement, rather than over-reliance on self-reporting. Public prosecutorial systems should additionally consider their capacity to respond to online illegal activity and build out bespoke workstreams where relevant.

For platforms:

When addressing online antisemitism, it is useful to distinguish between illegal content, which platforms are required to address increasingly under the spotlight of regulators, and content that is legal but harmful that may or may not be addressed by a platforms' terms of service. While efforts to curb illegal content are slowly progressing, there remains a significant inconsistency in whether and how online platforms employ proactive measures for mitigating systemic risks of harmful content that contributes to antisemitic narratives and directly targets Jewish users.

For all platforms:

Work with civil society to integrate expertise into moderation efforts

Platforms need to collaborate with civil society organisations to integrate their expertise into moderation efforts, ensuring a deeper understanding of the ways in which antisemitism manifests online. For example, the French organisation CRIF sends a bi-annual list of antisemitic codes to platforms, including new euphemistic terms for referring to Jews, a practice that could be effectively replicated in other regions to enhance content moderation. By working closely with Jewish organisations and experts, platforms can better identify and address emerging forms of antisemitic activity, improving their response to hate speech targeting Jewish communities, harassment, doxing and other forms of online harm.

Provide transparency of algorithmic systems

Platforms need to increase transparency of both recommender algorithms to understand the extent which antisemitism is algorithmically amplified, and algorithmic moderation systems to show algorithmic training, including accuracy and regularity of updates. Public risk assessments, required by the DSA for Very Large Online Platforms (VLOPs) should be broken down by different types of hate speech, including antisemitism, and by training their systems for crisis response to effectively manage surges in harmful content. Small platforms too should provide public accountability for algorithmic systems.

Further train algorithms and those who develop them

To effectively moderate content, platforms should train algorithms to accurately detect covert antisemitic content while ensuring these systems are regularly updated to address evolving tactics. Incorporating expert knowledge on antisemitism during the development of AI-based systems is essential to enhance their accuracy and adaptability in identifying both overt and subtle harmful expressions. Higher accuracy of algorithmic moderation systems would assist both detection of antisemitism, and avoid over-moderation.

Maintain and increase human moderation and provide antisemitism training

To effectively address antisemitism, platforms should ensure better education and training for content moderators on an ongoing basis, including collaboration with civil society organisations. Content moderation policies and teams should be inclusive and culturally sensitive, with upskilling focused on issue-specific knowledge such as antisemitism, local contexts, and nuanced language use to enhance the identification and mitigation of harmful content. Additionally, maintaining human moderation as a core component is vital to capture context and subtlety that automated systems might miss, ensuring a more comprehensive response to antisemitic content.

Ensure proportionality of content moderator teams per language

The number of content moderators should be proportionate to the number of platform users of each country and in each language to ensure adequate oversight and effective moderation of antisemitic and other harmful content. This approach helps address regional needs and ensures that moderation efforts are appropriately scaled to local content volumes, cultural codes and contexts.

Clearly communicate responses to reporting

Platforms should communicate more clearly about their responses to flagged content, as required in the DSA. This should involve providing users with detailed feedback on whether their reports were acted upon, the rationale behind moderation decisions, and any actions taken. Clear communication would help build trust with users and ensures transparency in content moderation processes.

Enhance accessibility of staff

Platforms should make it easier for users to reach out

by ensuring localised staff maintain relationships with civil society stakeholders. This can contribute to improved communication channels, strengthens community trust, and enables a more informed and context-aware approach to addressing antisemitic content.

Improve reporting mechanisms for illegal content
Platforms should generally adopt incorporate a victim-centred, and trauma-informed lens throughout the development of user interfaces and reporting tools. By investing in user-friendly reporting mechanisms that specifically address antisemitism, platforms can cover the full spectrum of online violence and harmful content. These systems should be simplified to make it easier for users to flag antisemitic content, encouraging more reports and ensuring better identification and response, while maintaining compliance with legal standards.

Introduce measures for so-called grey area content
Platforms need to implement proactive measures to address content that sits in grey areas of both illegality and platform Terms of Service. This can include measures such as downranking content, to ensure that such material, while not violating specific laws, is still effectively mitigated to prevent harm to Jewish communities.

For Very Large Online Platforms (VLOPs):

Fully implement platform Terms of Service and DSA requirements
Platforms must implement and enforce their Terms of Service (ToS) and adhere to the Digital Services Act (DSA) to better address online antisemitism. This includes ensuring the accessibility of reporting structures, allowing users to easily flag antisemitic content, and swiftly removing violative content and the accounts of repeat offenders. By improving the implementation of these policies, platforms can more effectively combat antisemitic abuse and harassment, ensuring a safer online environment for Jewish communities.

Ensure independent scrutiny through comprehensive data access
Platforms should comply with DSA regulations by providing data access through APIs, enabling researchers to access platform data. This transparency would significantly enhance the ability to monitor, analyse, and address antisemitic content, improving overall accountability and research capabilities.

Disaggregate hate speech reporting data
While platforms often provide standardised transparency reports on content moderation implementation, simply reporting breakdowns of hate speech without clear categorisation can obscure the relative volumes of harmful content, making it difficult to assess the effectiveness of the systems in place. Consequently, these reports should be disaggregated and intersectional to ensure accountability and enhance the effectiveness of content moderation over time.

For smaller platforms:

Compliance with regulatory requirements
Small platforms must still comply with legal requirements by publicly stating where they are registered and ensuring they respond appropriately to reports of illegal content, including antisemitic material. While resource constraints may exist, these platforms have a responsibility to meet regulatory standards and protect users by addressing illegal content in a timely and transparent manner. Smaller platforms should be encouraged to go beyond legal obligations under the DSA and commit to requirements for larger platforms, including risk assessments and transparency mechanisms. For those platforms looking to become VLOPs, this should be seen as an early investment in compliance and positive user experiences.

For regulators:

Build knowledge and capacity around the DSA

To ensure the effective implementation of the Digital Services Act (DSA), there must be greater outreach and support to build capacity among Civil Society Organisations (CSOs). For instance, many CSOs currently lack the necessary knowledge and tools to engage fully in trusted flagger activities. Even more so, they are not aware of the tools and mechanisms offered by the DSA. Consequently, the Digital Services Coordinators (DSCs) should provide targeted support and training to empower CSOs, clarifying their role and the available tools, levers and provisions under the DSA. Strong partnerships between communities, civil society, and regulators are essential to integrate community expertise into risk assessments and create a more collaborative, effective approach to content moderation and regulation.

Identify suitable trusted flaggers

The DSCs should identify and designate suitable trusted flaggers to support the implementation of the DSA. While transparency around trusted flaggers is important, it is equally crucial to ensure they are protected from abuse or retaliation when performing their duties, to maintain their effectiveness and safety in the content moderation process.

Include languages spoken in the EU such as Turkish, Arabic and Russian

Regulators should ensure that languages spoken by diverse European communities, such as Arabic, Russian, and Turkish, are included in content moderation and risk assessments. This knowledge is vital for addressing region-specific challenges, e.g. Arabic-language terrorist content or Russian disinformation. Integrating these languages into systemic risk assessments will enhance the effectiveness of measures against antisemitism and other forms of harmful content.

Identify locally registered smaller platforms

The respective Digital Services Coordinators (DSCs) should continue to monitor smaller platforms by identifying which platforms are registered in their respective countries and ensuring they comply with relevant regulations. A central, publicly accessible list of these platforms should be created, making it easier for regulators and the public to track compliance and ensure that even smaller platforms are effectively addressing antisemitism and other harmful content.

Adequately respond to illegal content requirements and repeat offenders

Regulators should ensure that platforms have clear procedures for identifying and responding to persistent offenders and violators, introducing actions such as temporary suspensions or permanent bans, and ensuring that repeat offenses are addressed with increasing severity. This approach is essential for deterring harmful behaviour and maintaining a safer online environment.

For civil society:

For Jewish civil society:

Build resilience among communities to mitigate and effectively respond to online hate

Communities could look to develop resilience building campaigns and resources to mitigate the profound impacts of online hate. Such tools could pull learning from other sectors, such as resources developed to support researchers of terrorism studies. These efforts should also aim to build capacity among Jewish communities on navigating and responding to antisemitic content. At its core, resilience building efforts should consider the internal polarisation of Jewish communities and integrate the diversity of Jewish identity and experience.

Internal capacity building on detecting online antisemitism

Jewish community organisations could look to engage with their members to build understanding of manifestations of antisemitism to assist reporting. This should also include building capacity on separating anti-Israel content from antisemitism. There is broadly a concern that panic over misinformation about antisemitic incidents or reporting of non-antisemitic incidents eats into the very limited bandwidth of monitoring bodies. The CRIF, for example, hosts its quarterly webinars for community members on understanding antisemitism.

Develop strategic response programming to online antisemitism

Building on many existing excellent campaigns, an innovative set of strategic communication responses could look to integrate knowledge from the success of the wider anti-hate and counter-terrorism sectors. This could include ecosystem disruption, targeted interventions to the most vulnerable groups, and interfaith work. Such programming should be monitored and evaluated on an ongoing basis to measure not just reach but behavioural and attitudinal change.

Collaborative support for smaller communities

While significant effort has been invested into building comprehensive counter-narrative response in English, smaller communities such as those in Italy reported a lack of Italian-language data and material. Investment from international Jewish organisations in smaller communities is vital to build response capacities in local languages.

For wider civil society:

Foster solidarity with Jewish communities

To mitigate the isolation which Jewish communities in all covered geographies reported, the wider civil society sector should engage with those facing antisemitism. Productive and good faith dialogues should seek to build solidarity among the sector at large. Acts of solidarity should seek to reclaim online discourse, not allowing the loudest hateful spaces to dominate, and promote counter-narratives that focus on supporting Jewish communities over amplifying hateful actors.

Exchange knowledge on the DSA with antisemitism experts

Jewish communities can greatly benefit from the DSA expertise built by the wider anti-hate and digital policy civil society sector. More collaboration between these groups would not only bolster understanding of antisemitism among the counter-hate and the wider digital policy sector, but allow antisemitism experts to gain a better understanding of how the DSA can work to their benefit.

Looking Ahead

Across interviews with 42 Jewish community organisations and experts in antisemitism and digital policy in France, German, Italy, Poland and Sweden, this paper has synthesised trends in local knowledge and challenges of online antisemitism. Building on these grassroots experiences, it outlined a set of concrete steps that governments, platforms, regulators and civil society organisations should take to begin to address this wave of online hate.

Interview participants emphasised, above all, the real-world consequences they experience due to the normalisation and mainstreaming of online antisemitism. As the antisemitism crisis deepens, these accounts should serve as a call to action for society at large to respond. While many innovative and important steps have been taken, they are yet to match the scale of the challenge. As such, this policy roadmap presents a vision for international and inter-sectoral cooperation to adequately respond to and mitigate the severe challenges posed by online antisemitism. Reducing online antisemitism and mainstreaming digital human rights will not only safeguard Jewish communities but also protect European democracy as a whole.

CCOA | Coalition to Counter Online Antisemitism

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