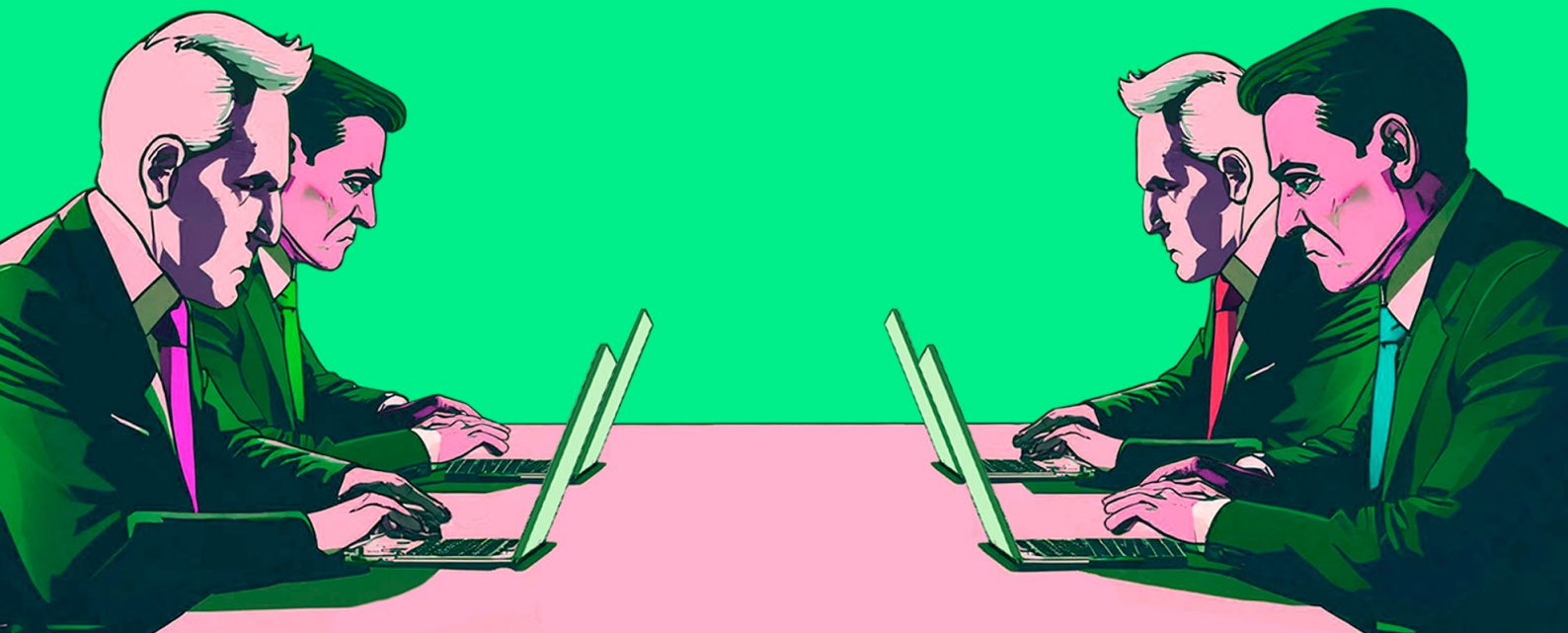# Elections Monitoring 2024: POLAND

Electoral Integrity and Political Microtargeting in the European Parliament Elections:
An Evidence-Based Analysis

November 2024

Fundacja Odpowiedzialna Polityka

CIVIL LIBERTIES UNION FOR EUROPE

About the project

This research paper by the ***Political Accountability Foundation (PAF)*** was prepared as a contribution to the project 'Electoral Integrity and Political Microtargeting: An Evidence-Based Analysis in Six EU Member States', coordinated by the Civil Liberties Union for Europe (Liberties).

The research project monitored online political advertising in the run-up to the 2024 European Parliament elections in six EU countries: Bulgaria (BHC), France (VoxPublic), Germany (Reset Tech), Hungary (HCLU), Poland (PAF) and Spain (Xnet), supported by Who Targets Me (WTM) as technical partner. The project relied primarily on data collected during the European Parliamentary elections campaign from political advertisements promoted on Facebook by political entities. Researchers scrutinised whether political actors follow national campaigning rules and European data protection rules by examining data voluntarily donated by citizens through a privacy-friendly desktop browser extension.

The project was co-funded by Civitates and the Open Society Foundations.

Any views and opinions expressed by the author of this research paper are solely those of the author and do not reflect the views and opinions of Liberties or the co-funders.

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Executive Summary

- Online news platforms have increased their political influence in recent years, alongside social media.

- Advertising spending sharply decreased among government entities, NGOs, and state-owned communal companies in the 2024 election cycle compared with previous campaigns.

- This research found that:

  > One limitation of the data is that many online 'influencers' discuss individual political issues without sponsorship or direct party endorsement, making this type of political messaging absent from the Facebook Ad Library.

  > Most political advertisements focused on presenting candidates rather than providing agendas or plans.

  > Just four political parties/groups account for over 65% of political ad spending on Facebook (Meta), and just two groups account for over 70% of spending on Google.

- The National Electoral Commission (NEC) has a primarily interpretive role, leading to challenges in the regulation of online political advertisements and other campaign activity.

- Poland has yet to fully align with the EU's Digital Services Act (DSA) and Transparency and Targeting of Political Advertising Act (TTPA), leading to compliance issues. Some regulations, like the requirement to clearly indicate the sponsoring electoral committee, are often ignored.

- Policy recommendations include:

  > Verification processes of online platforms should be tailored to the specific legal requirements of the countries in which they operate in order to ensure compliance with national laws and promote transparency in political advertising.

  > Google should ensure that ads are clearly labelled as political, and should add a feature allowing users to report political ads.

  > The Polish government should introduce stronger legislation to ensure compliance with TTPA and DSA requirements, such as linking these requirements to existing Polish transparency mechanisms. These regulations should also be clearly communicated to political advertisers.

I. Country context

Political and Electoral Landscape

Poland is a unitary republic with a parliamentary system and a strong presidency, underpinned by the 1997 Constitution. Major political parties, shaped by the legacy of past regimes, include Law and Justice (PiS), Civic Platform (PO), the Polish People's Party (PSL), the Left, Poland2050, and Confederation. Since 2015, PiS has been the dominant force, raising concerns over democratic decline due to controversial reforms impacting the judiciary, media, and other institutions, leading to tensions with the European Commission.

In the 2023 parliamentary elections, a coalition led by Civic Platform, Third Way, and the Left ousted PiS, with Donald Tusk emerging as a key leader. The 2024 European Parliament (EP) elections, following closely after local elections, saw intense campaigns and concerns about transparency in spending. Poland elected 53 Members of the EP.

Media Landscape

Media consumption in Poland is evolving[1], with traditional media in decline and the internet gaining prominence; by 2023, 40% of Poles relied on it for news. Online news platforms like WP.pl, Onet.pl, Interia, and Gazeta.pl have become significant, alongside the growing influence of social media in political advertising. Public broadcasters saw leadership changes, leading to a more balanced news presentation, while conservative audiences shifted to private channels like TV Republika. TVN and Polsat remain the top private stations.

II. 2024 EP Elections

The social media campaign in Poland mirrored traditional methods, with outdoor ads, posters, leaflets, and mass media appearances still central. The campaign focused on security concerns related to the Ukraine conflict, the Belarusian border crisis, and anti-LGBTQ+ and anti-Green Deal narratives. Alleged scandals of the previous coalition were also highlighted.

The election results are as follows:

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1   Data about traditional media is based on the research by CBOS (2023), Communique of the research: Media perception 2023; CBOS (2024), Communique of the research: Media assessment 2024.

POLITICAL GROUP	VOTES %	SEATS #	EP AFFILIATION
Civic Platform (KO)	37.06	21	EPP (European People's Party)
Law and Justice (PiS)	36.16	20	ECR (European Conservatives and Reformists)
Konfederacja	12.08	6	ESN (European Social Network) and non-inscrits
The Left	6.30	3	S&D (Progressive Alliance of Socialists and Democrats)
Trzecia Droga	6.91	3	EPP (2 seats), Renew Europe (1 seat)

III. Analysis

Online advertisement

WhoTargetsMe has been used in Poland since 2019, which allowed it to build a stable sample of 297 users and a still-growing database of political advertisers. The demographics and declared political views of users (according to their own declaration) are shown below. It is not representative of the Polish population, nor Internet or social media users, but allows for the identification of ads not present in Facebook Ads Library as political.

It is worth mentioning this is relevant to Meta platforms only, as Google data is taken directly from the Ads Transparency and does not currently rely on the extension. Operating with Ads Transparency is less effective, as often entities do not register as political. Additionally, the graphical interface is bugged and the workflow for analysis is less efficient compared with Facebook.

NOT DECLARED	EXTREME LEFT	LEFT	CENTER-LEFT	CENTER	CENTER-RIGHT	RIGHT	EXTREME RIGHT
25	69	56	63	41	22	8	11

MALE	FEMALE	OTHER		18-24	25-34	35-44	45-54	55-64	65+
207	87	3		18	91	92	52	24	20

Between 10 March and 9 June, 2024, the extension recorded 5,282 ads in Meta advertisement channels published by Electoral Committees.[2] They have been categorised by the Political Accountability Foundation into several non-exclusive categories, where the *Polish Electoral Committees* set includes political actors of EP elections, but also local and parliamentary ones. Some of them ended up not participating in the campaign or not publishing campaigns on online advertisement platforms.

Furthermore, several other sets were created and tracked, which included country-wide and local media, government (public institutions of the state, local, and EU), state-owned and communal companies and NGOs.

It is worth noting that both the number of ads and spending by such entities during the campaign drastically decreased compared to previous ones. In contrast to parliamentary elections and the referendum of 2023, these entities had far smaller significance, even when compared to spending by the political parties.

2   The extension recorded 361,361 ads, the majority of which were not political.

POLISH ELECTORAL COMMITTEES[3]
KO (KKW Koalicja Obywatelska)
ZP (KW Prawo i Sprawiedliwość)
KWIN (KW Konfederacja)
LEW (KKW Lewica)
TD (KKW Trzecia Droga PSL-PL2050 Szymona Hołowni)
BS (KWW Bezpartyjni Samorządowcy-Normalna Polska)
Others

Targeting

The WTM extension data isn't fully representative, but most data from all electoral committees was observed in Mazowieckie and Dolnośląskie voivodeships, which correlates with other sources. While most ads followed TTPA-sanctioned targeting methods (location, age, and sometimes gender), some used custom engagement and lookalike audiences, raising legal concerns about campaign funding and data processing. At least 260 instances of such ads were identified. Influencers discuss political issues but don't openly support specific parties, so such collaborations aren't disclosed in the Facebook Ad Library. They also rarely disclose private sponsorships clearly in such repositories.

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3   An electoral committee according to Polish Electoral Code is an entity that nominates and represents candidates in elections and runs an election campaign on their behalf. The ads were assigned to an electoral committee not only when they were declared as published by such, but also if they were published by candidates or other actors known for political affiliation or clearly matching with their agenda e.g. MP of the same group, leader of the party, supporters resharing official posters etc. The table is not complete and does not include political actors and their profiles, which didn't appear during parliamentary and local elections.

Themes[4]

Most of the advertisers were focused on presenting the candidates, without actually providing their agenda or plans, which traditionally are secondary.

POLITICAL GROUP	CAMPAIGN FOCUS
Law and Justice (PiS)	National security, rejection of the euro, promoting Polish agriculture, defending national interests, national pride, urgency to win.
Civic Coalition (KO)	EU membership, grassroots support, social security, anti-corruption.
Confederation (Konfederacja)	Limiting overregulation, opposing migration, criticising modern values and Green Deal, strong Eastern border security, 'normal life'.
The Left (Lewica)	Criticism of Green Deal (as insufficient), social policies, LGBTQ+ rights, affordable housing.
Third Way (Trzecia Droga)	Rejecting extremes, promoting entrepreneurship, focus on future generations, strong alliances, safety, development.

4   Data based on text of ads on Facebook, processed by AI, revised by the author.

Spendings

Meta

We have identified 7,139 advertisers of political figures from the Polish Electoral Committees. For those who were active between 22 April and 9 June 2024, a total of €**826 221** was spent on political advertisements, with an average daily spending of €**16,862**, and the total for all advertisers on the highest day — 7 June — €**83,523**.

RANKING	PARTY/GROUP	ACTIVE PAGES	AVG. SPEND (EUR) PER PAGE	SHARE OF SPENDING	TOTAL SPEND (EUR)
1	KO	139	1 301	21.88%	180 762
2	ZP	136	1 099	18.09%	149 426
3	LEW	64	2 141	16.58%	137 015
4	TD	71	1 185	10.18%	84 084
5	KWIN	37	1 435	6.42%	53 083
6	Others	42	74	0.38%	3 114
7	BS	8	202	0.20%	1 617

Note: results do not sum up 100% or numbers from above, as some entities were omitted from the table.
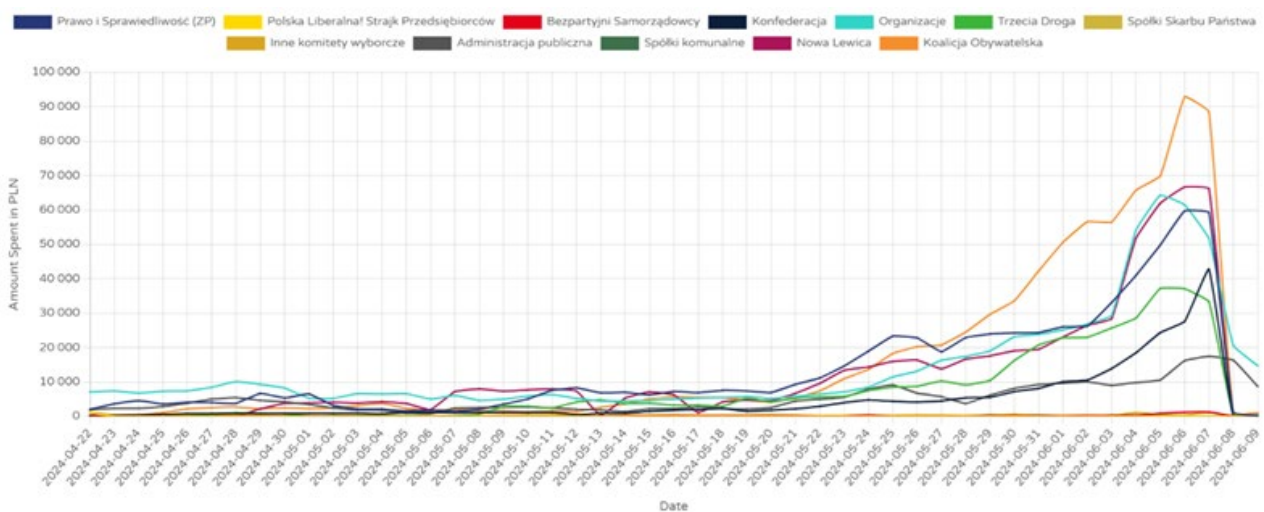

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Note: graph shows also other entities: NGOs, communal services, state-owned companies, local government and the state.

Google

We have identified 151 advertisers categorised into the Electoral Committees set, active between 22 April 22 and 9 June 2024, from a total of €**532,682** were spent on political advertisements, with an average daily spending of €**10,870**, and a total of €**37,003** for all advertisers on the highest days—2-7 June.

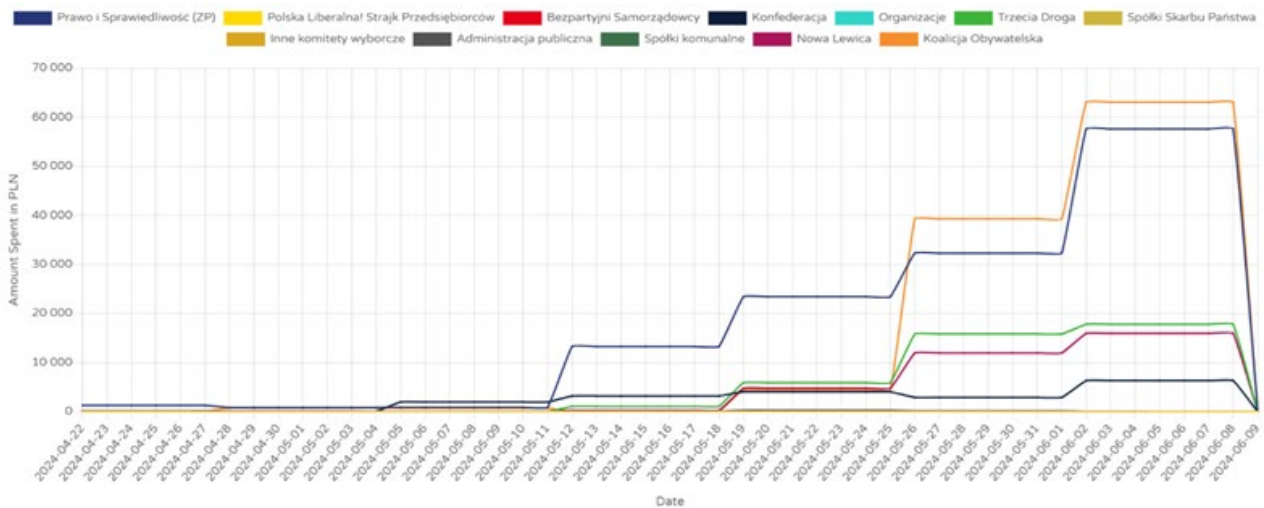| RANKING	PARTY/GROUP	ACTIVE PAGES	AVG. SPEND (EUR) PER PAGE	SHARE OF SPENDING	TOTAL SPEND (EUR)
1	PiS	14	14 936	39.17%	208 626
2	KO	6	29 161	32.77%	175 072
3	TD	2	32 674	12.28%	65 125
4	LEW	3	17 692	9.96%	53 073
5	KWIN	1	29 854	5.59%	29 854

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Note: graph shows also other entities: NGOs, communal services, state-owned companies, local government and the state.

IV. Regulations and compliance

The Polish Electoral Code, though comprehensive, has not fully addressed modern challenges like online advertising, leading to legal uncertainties. Online campaigning is regulated under the same rules as traditional methods,[5] but the amendment of Article 106—allowing any citizen to participate in campaigns[6]—has sparked controversy. Critics argue that this change could lead to uncontrolled funding and potential corruption, bypassing the stricter regulations that historically governed campaign activities.

Campaign financing remains strictly limited to donations from Polish citizens and bank loans, with European political party involvement deemed illegal by the National Electoral Commission (NEC). However, the NEC's role is primarily interpretative, relying on financial reports from electoral committees, which are submitted up to three months after election day. This makes it challenging to enforce regulations, especially in the digital realm, where campaign activities can be harder to track and regulate.

Poland has yet to fully align with the European Union's Digital Services Act (DSA) and Transparency and Targeting of Political Advertising Act (TTPA), leading to compliance issues. While the NEC interprets that the TTPA doesn't significantly alter existing national campaign regulations, the gap between national and European rules has led to practical problems, such as unreadable disclaimers on ads or non-compliance with transparency requirements set by online platforms.

Verification processes on online platforms are inadequate, often failing to ensure that the true sponsor and beneficiary of political ads are disclosed. In Poland, the sponsor and beneficiary must be the same entity—an electoral committee—but the registration process is similar for individuals and verified political entities. This similarity has led some parties to allow candidates to register ads independently, calculating that the risk of non-compliance with the DSA or Electoral Code is manageable.

This has resulted in numerous compliance issues, with some regulations, like the requirement to clearly indicate the sponsoring electoral committee,[7] often being ignored. The evolving digital landscape, coupled with slow legislative progress, has created significant challenges in

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5   cf. ZKF (2023), Clarifications on the Campaigning for Political Parties and Electoral Committees Conducted on the Internet.

6   v. Act of 11 January 2018 amending certain acts in order to increase citizen participation in the process of electing, functioning and controlling certain public bodies,130.

7   cf. Clarifications concerning the principles of conducting and financing election campaigning during the simultaneous duration of the election campaign in the elections of local government bodies ordered on 7 April 2024 and the election campaign in the elections to the European Parliament ordered on 9 June 2024. See here.

ELECTIONS MONITORING 2024: POLAND
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maintaining the integrity and transparency of electoral processes, raising concerns about the impact on future elections in Poland.

V. Recommendations

- The verification processes employed by online platforms should be tailored to the specific legal and regulatory requirements of the countries in which they operate. It is highly desirable that these platforms require advertisers to explicitly declare whether they are participating in the electoral process and to provide proof of their eligibility to engage in campaign activities. This would help ensure compliance with national laws (e.g. disclosure, electoral silence) and promote greater transparency in online political advertising.

- Google should ensure its verification processes align with TTPA requirements and take a more proactive approach to identifying political ads. It should also clearly label political ads and include basic information about an ad, along with options to report it as political. Additionally, Google should enhance the user experience of its Ads Transparency, as it is currently insufficient for effective analysis.

- The Polish parliament should promptly initiate a legislative process to meet DSA and TTPA requirements. The parliament should also consider explicitly linking the mandates of the DSA and TTPA to the spending transparency mechanisms outlined in the Electoral Code.

- Electoral administration should actively seek information in ad repositories within its mandate, as it does with information available in the traditional media.

- Once appointed, DSC should coordinate its efforts with NEC, making sure that the requirements of DSA are clearly understood, including by political advertisers.

Contacts

Political Accountability Foundation

The Political Accountability Foundation is a Polish non-partisan, non-governmental organisation whose mission is to improve the integrity and trust of political processes especially elections in Poland and Eastern Europe. Core activity of PAF is observing elections as a whole process.

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Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a Berlin-based civil liberties group with 22 member organisations across the EU campaigning on human and digital rights issues including the rule of law, media freedom, SLAPPs, privacy, targeted political advertising, AI, and mass surveillance.

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