

Institutional and Societal Mechanisms against Disinformation: Comparative Insights from Taiwan and the Republic of Korea¹⁾²⁾

Eunkyung, Park(朴銀慶)³⁾

Abstract

This study examines how two Asian democracies, the Republic of Korea and Taiwan, respond to the challenges posed by disinformation. While both states share vibrant civil societies and highly digitalized media ecosystems, their experiences diverge due to contrasting threat environments. Taiwan is situated at the frontline of systematic cognitive warfare orchestrated by the Chinese Communist Party, where disinformation campaigns are transnational, highly coordinated, and securitized. Korea, by contrast, faces disinformation primarily from internal drivers—partisan polarization, economic fragility in the media sector, and algorithmic amplification through platforms such as YouTube and online communities—although North Korea occasionally plays a role. Through a comparative case study combining literature review and fieldwork interviews with journalists, fact-checkers, and civil society actors in both countries, the research highlights how institutional and societal mechanisms have developed under different conditions.

Findings indicate that Taiwan has pursued a preventive, civic-led, and internationally integrated model, with organizations such as MyGoPen, Cofacts, and the Taiwan Fact-Check Center working in tandem with the Ministry of Digital Affairs. Korea initially attempted an institutional consortium through the Seoul National University Fact-Check Center but, after its collapse, shifted toward smaller nonprofit and citizen-based initiatives such as Danbi News. Despite political hostility and fragile funding, these experiments reflect democratic resilience and the search for sustainable alternatives.

The study argues that disinformation should be conceptualized not as a transient aberration but as a structural, long-term threat to democratic governance. Effective countermeasures require more than technical verification: they demand rebuilding public trust, institutional reforms adapted to domestic contexts, and strengthened international solidarity among democracies. Korea and Taiwan's contrasting experiences demonstrate both the risks of institutional fragility and the promise of civic innovation in defending democratic resilience.

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- 1) The present study is based on research I conducted in Taipei between February and June 2025 under the Taiwan Fellowship program. The research was undertaken at the Institute of Sociology, Academia Sinica.
 - 2) Throughout this thesis, the terms "Republic of China (Taiwan)" and "Taiwan," as well as "Republic of Korea" and "South Korea," are used interchangeably. For stylistic convenience, the shorter forms are employed more frequently, without implying any political stance.
 - 3) Eunkyung Park is a Research Fellow at the Institute for Global Strategy and Cooperation (IGSC), based in Seoul, Republic of Korea.

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1. Introduction

1.1 Research Problem and Background

One of the most critical challenges facing contemporary democracies is the rapid spread of disinformation⁴⁾. This phenomenon is often conflated with the term “fake news,” yet the two concepts are not identical. “Fake news” has been used as an umbrella term encompassing misinformation and disinformation, but such usage risks conceptual ambiguity in scholarly and policy debates. For this reason, the European Union’s High-Level Group of Experts (HLEG) in its 2018 report *A Multi-dimensional Approach to Disinformation* recommended abandoning the term “fake news” in favor of “disinformation.” Following this approach, the present study defines disinformation as “all forms of false, inaccurate, or misleading information designed, presented, and promoted to intentionally cause public harm or gain profit,” while excluding content such as defamation already regulated by law, or satire and parody.

Disinformation functions not merely as an error or journalistic mistake but as a structural threat that disrupts the core processes of democracy, including public opinion formation, elections, and policy-making. Politically motivated disinformation can distort voter judgment during sensitive electoral periods, deepen social polarization, and ultimately undermine trust in democratic institutions. Recent advances in artificial intelligence (AI) technologies have amplified the scope and impact of disinformation. Deepfake technologies that manipulate faces, voices, and expressions, together with algorithmic recommendation systems on social networking services (SNS), have rendered the production and dissemination of disinformation more sophisticated and instantaneous than ever before. Beyond simple textual distortions, emotionally manipulative audiovisual content increasingly exceeds individual citizens’ capacity to verify information, while SNS platforms accelerate the virality of sensational and emotionally charged material.

Paradoxically, the more open and transparent a democracy becomes, the more vulnerable it is to information and psychological warfare waged by external actors. Both the Republic of Korea and Taiwan exemplify this dilemma. As advanced democracies with vibrant civil societies and highly developed digital environments, they share democratic strengths such as media freedom, accessibility of information, and civic participation. At the same time, their openness provides fertile ground for the rapid dissemination of disinformation. Geographical proximity to authoritarian regimes—China and North Korea—further exposes both countries to persistent external information operations. Disinformation related to China and North Korea has proven particularly virulent, quickly distorting public opinion and generating wide-reaching consequences.

Taiwan’s 2018 local elections and 2020 presidential election, as well as the

4) European Commission, *A Multi-dimensional Approach to Disinformation: Report of the Independent High-Level Group on Fake News and Online Disinformation* (Brussels: European Commission, 2018).

Republic of Korea's 2017 presidential and 2020 legislative elections, witnessed numerous cases of disinformation allegedly linked to external actors. For instance, during the 2018 Osaka typhoon, the "Taiwanese boarding Chinese buses" narrative triggered a diplomatic crisis and the tragic suicide of a Taiwanese diplomat. In 2020, rumors concerning North Korean leader Kim Jong-un's health produced short-term but severe shocks to South Korea's financial and foreign exchange markets. Such cases vividly demonstrate how disinformation reverberates across political, diplomatic, and economic domains.

Despite facing similar threat environments, Taiwan and the Republic of Korea have developed distinct response mechanisms. Taiwan has built early-warning and pre-emptive systems centered on the Ministry of Digital Affairs and fact-checking networks, while Korea has established reactive frameworks led by the National Election Commission and the Korea Communications Standards Commission. These institutional approaches differ further in the ways they incorporate civil society collaboration, thus offering valuable grounds for comparative inquiry.

Against this backdrop, the present study seeks to compare and analyze how Taiwan and the Republic of Korea respond institutionally and societally to disinformation. Focusing particularly on the politically sensitive context of elections, it examines the modalities of disinformation operations and the corresponding countermeasures, with the aim of contributing to the development of information security strategies within democratic systems. Unlike existing studies that predominantly concentrate on single-country cases or technical solutions, this research adopts a multi-layered comparative approach, combining literature review with contextual institutional analysis. Through this approach, the study identifies both similarities and differences between the two cases, explores models of mutual reference, and assesses future possibilities for cooperation and institutional flexibility.

1.2 Research Questions and Methodology

This study develops a multi-layered analysis of the disinformation challenges faced by the Republic of Korea and Taiwan, guided by the following four research questions:

1.2.1 Research Questions

Evolution of legal and institutional frameworks. Both countries have recognized the spread of disinformation as a national threat within democratic systems, yet their responses have diverged according to distinct political and social contexts. This study investigates the legal bases and institutional arrangements established in each country, assessing their effectiveness and limitations.

Role of civil society and its interaction with state institutions. Responding to disinformation is not solely the responsibility of state power but requires active participation from civil society, media, and private platforms. The study analyzes how

civic actors contribute to counter-disinformation mechanisms and how cooperation—or conflict—with government institutions has unfolded.

Balancing democratic values and information security. Counter-disinformation efforts inherently create tension with freedom of expression and press freedom. This research evaluates how Taiwan's and Korea's mechanisms simultaneously uphold democratic openness and freedom while strengthening information security.

Implications for democratic resilience. Disinformation is a strategy that exploits the vulnerabilities of democratic systems. By comparing the Taiwanese and Korean experiences, the study explores what institutional and societal mechanisms are necessary to enhance resilience, and how mutual learning and international cooperation can be fostered.

1.2.2 Research Design

This study adopts a comparative case study approach. To move beyond a mere cataloging of institutional arrangements, it combines literature review with fieldwork interviews in order to capture how mechanisms function in practice.

- **Literature Review** : Relevant laws, institutional reports, policy documents, and scholarly research from both Taiwan and Korea were reviewed. This enabled identification of the institutional frameworks and contextual debates surrounding disinformation, as well as the limitations of existing research and the distinct contributions of this study.

- **Interview Research** : Fieldwork consisted of in-depth interviews with civil society representatives and fact-checking organizations in both countries. In Korea, interviews with staff at SNU FactCheck provided insights into the university-media nexus of fact-checking and its constraints. In Taiwan, interviews were conducted with representatives from Cofacts, Taiwan FactCheck Center, and MyGoPen, as well as with individuals involved in government-civil society cooperation.

In particular, **four interviews served as key primary sources**: Robin Lee (CEO of MyGoPen), Eve Chiu (CEO of Taiwan FactCheck Center), Billion Lee (Operator of Cofacts), and Eun-ryung Jung (former Director of SNU FactCheck Center and professor at Semyung University's Journalism School). These interviews addressed issues such as organizational operations, funding models, political independence, challenges in cooperating with digital platforms, and strategies for responding to AI-generated disinformation and deepfakes.

1.3 Analytical Framework

Building on these literature and interview data, the study compares Korea's and Taiwan's disinformation responses along two analytical axes: ① legal and institutional mechanisms and ② societal and civic mechanisms. This framework allows for a structural and contextual comparison that goes beyond descriptive listing, enabling

evaluation of the effectiveness and limitations of counter-disinformation systems as they operate in practice. Finally, the study seeks to draw practical implications for strengthening democratic resilience and to explore avenues for mutual learning and international cooperation between the two countries.

2. Literature Review

2.1 Conceptualization and Typology of “Fake News”

The term fake news has yet to achieve a universally accepted definition in academic discourse. Nevertheless, many scholars converge on three dimensions—intentionality, falsity, and impact—as fundamental criteria for distinguishing information disorders. Wardle and Derakhshan (2017)⁵⁾ developed one of the most widely cited typologies, dividing information disorders into three categories that have since become standard in international scholarship.

First, disinformation refers to deliberately fabricated or manipulated information created with the explicit intent to deceive audiences, usually for political or economic purposes. This type is closely associated with propaganda campaigns and psychological warfare strategies.

Second, misinformation refers to false or inaccurate information disseminated without malicious intent. Examples include journalistic errors due to poor fact-checking or individuals unintentionally sharing distorted news through social media.

Third, malinformation consists of information based on reality but framed in a misleading or harmful way, often to inflict reputational or social damage. While not entirely false, it distorts factual elements and can intensify political or social tensions, especially during sensitive periods such as elections or diplomatic crises.

This tripartite distinction is not only conceptual but also has significant policy implications. Both Taiwan and the Republic of Korea primarily regulate disinformation through legal frameworks, but in contexts involving national security or elections, malinformation is also subject to regulation.

In ROK, scholarly debates have shifted from the vague term fake news toward the more precise concept of “fabricated disinformation” (허위조작정보).⁶⁾ Kwak and Lee (2020)⁷⁾ examined the macro-level mechanisms of disinformation production and circulation, highlighting its evolution under technological and political transformations. Kim et al. (2021)⁸⁾ further refined the typology in the North Korean context, classifying

5) Wardle, C., & Derakhshan, H. (2017). *Information Disorder: Toward an Interdisciplinary Framework for Research and Policy Making*. Strasbourg: Council of Europe, pp. 5–7.

6) 곽선희·이성욱 (Kwak, S. & Lee, S.) (2020). 「가짜뉴스의 생산과 전파, 그리고 규제(Production, Circulation, and Regulation of Fake News)」, 『한국언론학보(Korean Journal of Journalism & Communication Studies)』, pp. 35–36.

7) Ibid., pp. 42–44.

8) 김성해 외 (Kim, S. et al.) (2021). 「위선과 무례함 그리고 사악함의 변주곡: 북한 관련 '가짜뉴스'를 통해 본 한국 언론의 민낯(Variations of Hypocrisy, Rudeness, and Evil: The Face of Korean Journalism through North Korea-Related Fake News)」, 『한국언론학보(Korean Journal of Journalism

disinformation into four subtypes: ① leadership health rumors, ② “royal family” rumors, ③ purges of close aides, and ④ miscellaneous forms. Yang (2020)⁹⁾ underscored how distribution channels and ripple effects of such rumors elevate them into national security threats. In electoral politics, Min and Choi (2024)¹⁰⁾ demonstrated through the 20th presidential election in Korea that political parties and candidate camps served as primary producers of disinformation. Their study also revealed how the structural features of social networking services fostered both closed-circuit communication and viral dissemination.

In Taiwan, Tsui (2020)¹¹⁾ conceptualized disinformation as a process of securitization, arguing that the People’s Republic of China’s public opinion warfare deepens internal polarization. Wang (2019)¹²⁾, analyzing the Osaka consular incident, showed how disinformation can impose immense psychological pressure on diplomats, even leading to tragic consequences.

2.2. Evolving Research on Disinformation: Trends and Significance

Over the past decade, scholarship on disinformation in the Republic of Korea and Taiwan has developed along distinct but complementary lines, reflecting both the evolution of media environments and the geopolitical vulnerabilities of the two democracies. Three major streams of research can be identified: structural analyses, case-oriented investigations, and security-centered approaches.

Structural analyses emphasize the interaction between technological infrastructures and political contexts. Kwak and Lee (2020)¹³⁾ demonstrated that disinformation continuously adapts to the algorithm-driven dynamics of social networking services and to the intensifying polarization of political discourse. Their findings underscore that disinformation should not be understood as a static phenomenon but as an evolving practice embedded in broader systemic conditions.

Case-oriented investigations have focused on specific electoral and diplomatic events. In Korea, Min and Choi (2024)¹⁴⁾ showed that political parties and candidate

& Communication Studies), pp. 112–115.

9) 양무진 (Yang, M.) (2020). 「북한 관련 가짜뉴스 유형, 유통과 대응 방안(Types, Distribution, and Countermeasures of North Korea-Related Fake News)」, 『통일정책연구(Journal of Unification Policy Studies)』, 제29권 1호, pp. 20–23.

10) 민희·최한별 (Min, H. & Choi, H.) (2024). 「소셜 미디어 공간의 가짜뉴스 생산과 확산: 제20대 대선 사례 (Production and Diffusion of Fake News in Social Media: The Case of Korea’s 20th Presidential Election)」, 『한국언론정보학보(Journal of Korean Association for Journalism & Communication Studies)』, pp. 58–61.

11) Tsui, H. (2020). *The Securitization of Disinformation: Taiwan’s Fake News Phenomenon and Anti-Disinformation Initiatives*. Taipei: Institute for National Security Studies (INSS), pp. 10–15.

12) 王俊杰 (Wang, C.-C.) (2019). 〈假新聞造成的社會影響 - 以蘇啟誠處長事件為例(The Social Impact of Fake News: The Case of the Osaka Consular Incident)〉, 『新聞學研究(Mass Communication Research)』, 第141期, pp. 88–91.

13) Kwak, S., & Lee, S. (2020). *Production, Circulation, and Regulation of Fake News*. Korean Journal of Journalism & Communication Studies, 64(2), pp. 35–44.

14) Min, H., & Choi, H. (2024). *Production and Diffusion of Fake News in Social Media: The Case of*

camps were among the most active producers of disinformation during the 20th presidential election, highlighting the paradox of SNS platforms as both echo chambers and accelerators of viral diffusion. In Taiwan, Wang (2019)¹⁵ analyzed the Osaka consular incident, demonstrating how disinformation extended beyond electoral manipulation to generate severe diplomatic tensions and even personal tragedies.

Security-centered approaches situate disinformation within the logic of hybrid warfare. Kim et al. (2021) and Yang (2020) highlighted the destabilizing effects of North Korea-related rumors, such as leadership health crises or elite purges, which can quickly escalate into national security threats. Tsui (2020)¹⁶ extended this perspective to Taiwan, contending that Beijing's information operations, framed as "public opinion warfare," are deliberately designed to exploit domestic political cleavages.

Taken together, these research streams reveal a paradigm shift: disinformation is increasingly conceptualized not merely as an ethical issue for journalism but as a systemic challenge threatening democratic resilience and national security. Yet, comparative analyses remain underdeveloped. Taiwan's case has been examined mainly through the lens of Chinese cognitive warfare, while Korea's has been studied primarily in relation to North Korean rumors. Few studies have systematically compared how the two countries—similar in their democratic openness yet vulnerable to authoritarian neighbors—develop institutional frameworks and mobilize civil society against disinformation.

The significance of the present study lies in addressing this gap. By juxtaposing the Korean and Taiwanese experiences, this research illuminates both commonalities and divergences in their institutional and societal mechanisms. It also highlights the delicate balance between safeguarding democratic freedoms and reinforcing information security, thereby offering broader insights into the resilience of democratic systems under the pressure of disinformation.

Korea's 20th Presidential Election. Journal of Korean Association for Journalism & Communication Studies, 98, pp. 58–61.

15) Wang, C.-C. (2019). *The Social Impact of Fake News: The Case of the Osaka Consular Incident*. Mass Communication Research, No. 141, pp. 88–91.

16) Tsui, H. (2020). *The Securitization of Disinformation: Taiwan's Fake News Phenomenon and Anti-Disinformation Initiatives*. Taipei: Institute for National Security Studies, pp. 10–15.

3. Institutional Mechanisms: Legal and Regulatory Responses

3.1 Republic of China (ROC)

3.1.1 Legal Framework

Taiwan's disinformation regulation rests on three main legal instruments: the Criminal Code, the Social Order Maintenance Act, and the Civil Servants Election and Recall Act. Among them, the electoral law provides the harshest penalties, with Article 104 stipulating up to five years of imprisonment for knowingly fabricating or spreading false information during election periods.¹⁷⁾ This reflects Taiwan's explicit recognition of disinformation as an existential threat to electoral integrity.

The Criminal Code (Arts. 251–259) penalizes rumor-spreading that undermines public order or security.¹⁸⁾ The Social Order Maintenance Act enables administrative fines for less severe cases. Taken together, this hybrid model of criminal sanctions and administrative penalties allows regulators to adapt their responses according to the severity and intent of the disinformation act.

3.1.2 Institutional Mechanisms

A turning point came with the creation of the Ministry of Digital Affairs (MODA) in 2022.¹⁹⁾ MODA consolidated fragmented digital governance functions and now coordinates across the Central Election Commission and National Communications Commission. Its mandate includes real-time rumor debunking, public communication strategies, and oversight of platform cooperation. Unlike Korea's dispersed authority, Taiwan's centralization enables faster, preventive interventions. MODA operates a "real-time clarification portal" and works directly with election authorities during campaign seasons. For instance, during the 2022 local elections, MODA collaborated with civil society and platforms to issue public clarifications within hours of viral rumors.²⁰⁾

Taiwan has developed close partnerships with private platforms. LINE, the dominant messaging app with over 90% penetration, hosts a Fact-Checking Chatbot run jointly with Cofacts and the Taiwan FactCheck Center.²¹⁾ Facebook and YouTube also implemented stricter takedown procedures during elections. Although these collaborations are not legally binding, they are reinforced through memoranda of understanding (MOUs) and political pressure coordinated by MODA.²²⁾

The 2018 Osaka Consular Incident demonstrated the lethal consequences of

17) *Civil Servants Election and Recall Act*, Art. 104.

18) *Criminal Code of the Republic of China (Taiwan)*, Arts. 251–259.

19) Ministry of Digital Affairs (MODA), "About MODA," 2022.

20) Tsui, H. (2020). *The Securitization of Disinformation: Taiwan's Fake News Phenomenon and Anti-Disinformation Initiatives*. Taipei: INSS, pp. 12–15.

21) National Development Council, *Digital Society Report*, 2022.

22) National Communications Commission (NCC), *Annual Report on Digital Governance*, 2022.

unchecked disinformation, as false rumors about Taiwanese tourists sparked diplomatic controversy and contributed to the suicide of diplomat Su Chi-cheng.²³⁾ In the 2020 presidential election, Taiwanese authorities detected multiple disinformation campaigns linked to Beijing, prompting the Central Election Commission and MODA to intensify cooperation with fact-checkers and platforms. These incidents illustrate how legal, institutional, and cooperative mechanisms have been stress-tested in real crises.

3.1.3 Analytical Assessment

Taiwan's framework demonstrates several strengths. Centralization under MODA ensures rapid coordination; electoral law imposes strong deterrence; and cross-sector collaboration increases resilience. However, concerns remain about over-criminalization and potential chilling effects on political speech.²⁴⁾ Moreover, dependence on platform goodwill, rather than enforceable obligations, limits the sustainability of current arrangements. Overall, Taiwan exemplifies a preventive, securitized approach to disinformation regulation, shaped by its unique geopolitical vulnerability to Chinese influence operations.

3.2 Republic of Korea

3.2.1 Legal Framework

The Republic of Korea (ROK) has pursued a predominantly ex post legal approach to disinformation, focusing on sanctions after dissemination rather than proactive filtering. Its framework combines criminal, electoral, media, and network-specific laws, reflecting the tension between freedom of expression and the imperative to safeguard democratic processes.

Criminal Law provisions under *the Criminal Act* (Arts. 307–309) penalize defamation, while Article 314 covers obstruction of business through deceptive practices.²⁵⁾ Although these provisions have been used to prosecute malicious online rumors, scholars note their limited applicability to systemic disinformation that threatens collective democratic functions.²⁶⁾

The Public Official Election Act (Art. 250) provides the most stringent safeguards, criminalizing the spread of false information about candidates or parties during election periods, with penalties of up to seven years' imprisonment.²⁷⁾ The National Election

23) Wang, C.-C. (2019). "假新聞造成的社會影響 - 以蘇啟誠處長事件為例(*The Social Impact of Fake News: The Case of the Osaka Consular Incident*)," *Mass Communication Research*, No. 141, pp. 88–91.

24) Cofacts, "Civil Society Statement on Disinformation Regulation," 2021.

25) *Criminal Act* (Act No. 293, 1953), Articles 307–309, 314.

26) 정정원 (Jung, J.) (2023). 「이른바 '가짜뉴스'에 대한 형사법적 대응방안(Criminal Law Responses to So-Called 'Fake News')」, 『비교법연구(Journal of Comparative Law Studies)』, 제23권 제1호, pp. 454–457.

Commission actively monitors digital platforms, but enforcement remains reactive, often criticized as too slow to prevent viral harms.

Debates over the Act on Press Arbitration and Remedies highlight Korea's struggle to balance accountability and press freedom. The 2021 amendment proposal sought punitive damages up to five times actual harm for "false or manipulated reports,"²⁸⁾ but civil society and international observers warned it could chill investigative journalism.²⁹⁾ The proposal was ultimately withdrawn, underscoring the difficulty of defining disinformation without undermining constitutional press freedoms.

Finally, *the Information and Communications Network Act* empowers the Korea Communications Standards Commission to order takedowns of unlawful or defamatory content (Art. 44-7).³⁰⁾ While widely used during elections and crises, this mechanism has been criticized for its reactive nature, as removals typically occur after viral diffusion has already caused damage.

Taken together, Korea's legal framework reflects a cautious, rights-oriented model. By prioritizing ex post remedies over preventive controls, it reduces the risk of state overreach but remains less effective in countering the speed and scale of contemporary disinformation.

3.2.2 Institutional Mechanisms

Beyond statutory provisions, the Republic of Korea (ROK) has established a set of institutional mechanisms to address disinformation, involving electoral authorities, media regulators, and fact-checking organizations. These institutions reflect Korea's reliance on ex post monitoring and sanctioning rather than proactive prevention.

The National Election Commission (NEC) plays a pivotal role during election periods. It monitors online platforms for false information about candidates or parties, issues corrective statements, and may request investigative or judicial action under the Public Official Election Act.³¹⁾ NEC campaigns such as "Election Fact Check" have raised public awareness, yet enforcement remains reactive, as viral rumors often spread widely before corrective measures take effect.

The Korea Communications Standards Commission (KCSC) serves as the primary regulator for online disinformation. Under the Information and Communications Network Act, it can order the deletion or blocking of unlawful or defamatory content.³²⁾ During

27) *Public Official Election Act* (Act No. 7681, 2005), Article 250.

28) 손형섭 (Sohn, H.) (2021). 「2021년 언론중재법 개정안의 비판과 개선에 관한 연구(A Critical Review and Improvement Measures of the 2021 Amendment to the Press Arbitration Act)」, 『공법학연구 (Public Law Studies)』, 제22권 제4호, pp. 180–182.

29) *Ibid.*, pp. 183–185.

30) *Act on Promotion of Information and Communications Network Utilization and Information Protection, etc.* (Act No. 6465, 2001; amended by Act No. 17358, 2020), Article 44-7.

31) *Criminal Act* (Act No. 293, 1953), Articles 307–309, 314.

32) *Act on Promotion of Information and Communications Network Utilization and Information Protection, etc.* (Act No. 17358, 2020), Article 44-7.

the 2022 presidential election, the KCSC reported processing more than 8,000 cases of online false information, with urgent takedowns conducted within 24 hours.³³⁾ Nonetheless, critics argue the Commission's role is constrained to individual postings, lacking the capacity to address coordinated influence campaigns.

In the media sector, the Press Arbitration Commission functions as a quasi-judicial body mediating disputes over manipulated or inaccurate reporting. The 2021 reform debate, although unsuccessful, highlighted its potential significance in balancing rapid remedies against press freedom concerns.³⁴⁾

Fact-checking initiatives have played an important but fragile role. The SNU FactCheck Center, launched in 2017 as a consortium led by Seoul National University, coordinated over 30 media outlets and was widely regarded as a pioneering hub. However, due to financial difficulties, the Center suspended operations indefinitely in August 2024.³⁵⁾ Since then, the fact-checking landscape has become more fragmented. Independent fact-checking functions are now primarily carried out within major news organizations themselves, such as the dedicated fact-checking desks at broadcasters like JTBC, KBS, and MBC. While these units provide ongoing verification, their capacity remains smaller and less coordinated than the former consortium model.

Taken together, Korea's institutional mechanisms demonstrate a pluralistic but fragmented approach. Responsibility is dispersed across election authorities, media regulators, and independent outlets, leading to delays and uneven responses. Unlike Taiwan's centralized and government-supported fact-checking network, Korea maintains a rights-oriented model that prioritizes press independence but struggles to establish early detection and integrated crisis management capacities.

3.3 Comparative Insights

A comparative examination of Taiwan and the Republic of Korea reveals two divergent institutional logics in countering disinformation. Taiwan has developed a preventive and centralized system, where the Ministry of Digital Affairs (MODA) coordinates rapid-response rumor control and collaborates closely with civil society fact-checking organizations such as Cofacts, the Taiwan FactCheck Center, and MyGoPen. This architecture reflects Taiwan's securitization of disinformation, shaped by the persistent threat of Chinese cognitive warfare.

By contrast, Korea relies on a reactive and fragmented system, in which multiple institutions—such as the National Election Commission (NEC), the Korea Communications Standards Commission (KCSC), and the Press Arbitration Commission—exercise

33) Korea Communications Standards Commission, "Report on Online Illegal Information During the 2022 Presidential Election," 2022.

34) Sohn, H. (2021). "A Critical Review of the 2021 Amendment to the Press Arbitration Act." *Public Law Studies*, 22(4), pp. 183–185.

35) Korean Society for Journalism and Communication Studies, "Press Release on the Suspension of the SNU FactCheck Center," August 2024.

jurisdiction over specific domains. Enforcement is predominantly ex post, focusing on post-hoc takedowns and criminal sanctions, while civil society's fact-checking capacity has weakened following the suspension of the SNU FactCheck Center in 2024. What remains are fragmented in-house desks within major broadcasters, which lack the scale and coordination of Taiwan's networked ecosystem.

As summarized in Table 1, the Taiwanese model emphasizes early intervention and centralized coordination, whereas the Korean model prioritizes rights-protection and multiple checks but suffers from institutional delays. These contrasts suggest complementary lessons: Taiwan could benefit from Korea's strong legal safeguards against state overreach, while Korea may draw from Taiwan's capacity for rapid, coordinated responses to mitigate the viral speed of disinformation.

Table 1. Comparative Institutional and Legal Frameworks against Disinformation in Taiwan and the Republic of Korea

Dimension	Republic of China (Taiwan)	Republic of Korea (ROK)
Legal Basis	<i>Criminal Code (Arts. 251–259); Social Order Maintenance Act; Civil Servants Election and Recall Act (Art. 104: up to 5 years imprisonment for false election info)</i>	<i>Criminal Act (Arts. 307–309, 314); Public Official Election Act (Art. 250: up to 7 years imprisonment for false election info); Press Arbitration Act (amendment debate, 2021); Information and Communications Network Act (Art. 44–7)</i>
Regulatory Institutions	Ministry of Digital Affairs (MODA) (est. 2022, central coordination); National Communications Commission (NCC) ; Central Election Commission (CEC)	National Election Commission (NEC) (election monitoring); Korea Communications Standards Commission (KCSC) (content removal); Press Arbitration Commission (media disputes)
Fact-Checking Ecosystem	Strong civil society–government collaboration; Cofacts , Taiwan FactCheck Center , MyGoPen ; LINE chatbot integrated with platforms	Consortium model (SNU FactCheck Center) suspended in 2024; remaining efforts are fragmented—fact-checking desks in broadcasters (JTBC, KBS, MBC) and smaller university-linked initiatives
Approach	Preventive / ex ante – rapid clarification portals, close platform cooperation, securitization of disinformation due to China factor	Reactive / ex post – legal sanctions and post-hoc remedies; fragmented enforcement across multiple bodies
Strengths	Centralized coordination; fast response; high civil–government synergy	Strong protection of freedom of expression; multiple checks and balances
Weaknesses	Risk of over-criminalization, chilling effects on speech	Delayed response; fragmented authority; lack of systemic early-warning

4. Institutional and Societal Mechanisms: Comparative Case Studies

4.1 ROC's Disinformation Threat Environment

Taiwan represents one of the most critical frontline democracies in the global struggle against disinformation. Its geopolitical proximity and contested sovereignty with the People's Republic of China (PRC) expose it to systematic, long-term information operations that differ in intensity and scale from those faced by many other democratic states.

4.1.1 Strategic Context: CCP's "Three Warfares" and Cognitive Operations

Since 2003, the Chinese Communist Party (CCP) has codified the doctrine of the "Three Warfares"—public opinion warfare, psychological warfare, and legal warfare—within its political-military strategy. Among these, public opinion warfare has emerged as a centerpiece of Beijing's Taiwan policy, designed to erode citizens' trust in democratic institutions and foster receptivity toward unification narratives.³⁶⁾

From 2014 onwards, the People's Liberation Army (PLA) further advanced the notion of cognitive warfare (認知戰), emphasizing "mind superiority" (制腦權). This doctrine regards the contest for perceptions, values, and political attitudes as a decisive precondition for military or diplomatic victory.³⁷⁾ Taiwan has thus become a testing ground where Beijing deploys cyberattacks, disinformation, and targeted propaganda in hybrid forms, often preceding or accompanying conventional diplomatic and economic pressure.³⁸⁾

4.1.2 Characteristics of Chinese Disinformation Campaigns Against Taiwan

Chinese-origin disinformation directed at Taiwan reveals several distinctive features:

- **Technological Sophistication and Scale** : Chinese-linked content farms, bot networks, and coordinated inauthentic behavior spread narratives across platforms such as Facebook, LINE, YouTube, and TikTok. Semi-fabricated news—mixing verifiable facts with distortions—enhances credibility while accelerating viral dissemination. Notably, researchers have documented YouTube channels that employ AI-generated Taiwanese accents to disguise their PRC origin.³⁹⁾

- **Exploitation of Domestic Cleavages** : Beijing amplifies internal debates over sensitive social issues such as pension reform, same-sex marriage, and labor rights. By inflaming polarization, these campaigns aim to weaken institutional trust and portray

36) *Taiwan and the CCP's "Public Opinion Warfare"* (Central Police University, 2019), pp. 39–45.

37) Ying-Yu Lin, *China's Cognitive Warfare Against Taiwan and Taiwan's Countermeasures* (Tamkang University, 2020), pp. 37–44.

38) Puma Shen, *How China Initiates Information Operations Against Taiwan* (National Taipei University, 2018), pp. 19–24.

39) *Ibid.*, pp. 26–28.

democracy as inherently divisive.⁴⁰⁾

- **Election Interference** : During the 2018 local elections and the 2020 presidential race, Chinese-originated disinformation ranged from rumors of ballot fraud to fabricated scandals about candidates' private lives. These narratives sought to discredit the Democratic Progressive Party (DPP) while subtly favoring pro-Beijing alternatives.⁴¹⁾

4.1.3 Civil Society Responses

Taiwan's defense against disinformation is distinguished by its vibrant civil society initiatives.

- **MyGoPen** : With seven permanent staff members, MyGoPen processes around 1,500 citizen inquiries per day, primarily through partnerships with Facebook and LINE. Beyond debunking, it integrates media literacy into elementary school curricula. As founder Robin Lee emphasized, "technology is only a secondary tool—the ultimate safeguard is citizens' critical thinking."⁴²⁾

- **Cofacts** : Cofacts operates entirely on a volunteer basis as an open-source chatbot within LINE. Its system allows citizens to both submit suspicious messages and access crowd-verified responses. By avoiding reliance on large external grants, it preserves operational independence. As co-founder Billion Lee explained, "even if subsidies disappear, the system can continue, because it belongs to the volunteers."⁴³⁾

- **Taiwan Fact-Check Center (TFC)** : Initially cautious about naming disinformation actors, TFC later adopted a more assertive approach. Today, it publicly attributes responsibility to influencers and media outlets that repeatedly spread falsehoods, while protecting the anonymity of ordinary citizens who inadvertently share misinformation. As Director Eve Chiu explained: "ordinary people who forward a rumor by mistake are not malicious; but media or influencers with large followings must be held accountable."⁴⁴⁾

These organizations operate in a spirit of cooperation rather than competition. One TFC member noted: "there is simply too much disinformation for any one institution to handle," underscoring the collective approach that characterizes Taiwan's fact-checking ecosystem.⁴⁵⁾

4.1.4 State and Institutional Measures

The Taiwanese government has adopted a comprehensive "whole-of-government"

40) Lin, *Cognitive Warfare*, pp. 44–46.

41) *Taiwan and the CCP's "Public Opinion Warfare"*, pp. 48–49.

42) Interview with Robin Lee (MyGoPen), June 2025.

43) Interview with Billion Lee (Cofacts), June 2025.

44) Interview with Eve Chiu (Taiwan Fact-Check Center), June 2025.

45) Ibid.

approach, consistently framing information security as national security. This strategy is reflected in several measures:

- **Rapid-response rumor-debunking portals**, which disseminate clarifications within hours of viral falsehoods;
- **Coordination with civil society fact-checkers**, ensuring that professional NGOs and volunteer platforms can extend their reach;
- **Public media literacy initiatives**, incorporated into school curricula and community programs to build long-term resilience;
- **International cooperation**, especially with the European Union and the United States, sharing best practices on counter-disinformation and cybersecurity.⁴⁶⁾

Former President Tsai Ing-wen has repeatedly underlined that Beijing's interference not only targets Taiwan's domestic politics but also serves as a laboratory for global authoritarian influence. Taiwan's governmental responses, therefore, are not merely defensive but also carry international significance.⁴⁷⁾ This experience suggests that Taiwan's case provides valuable insights for other democracies confronting similar threats.

4.2 ROK's Disinformation Threat Environment

South Korea, like Taiwan, has faced persistent challenges from disinformation, though the dynamics are shaped less by external geopolitical interference and more by internal political polarization and distinctive media consumption patterns. While disinformation in Taiwan is often linked to external threats from the People's Republic of China (PRC), the Korean case illustrates how domestic political conflicts, media structures, and economic constraints create a fragile environment for fact-checking.

4.2.1 Media and Platform Environment

South Korea exhibits a distinctive media ecology. Surveys by the Korea Press Foundation (2024) and the Reuters Institute (2022–23) consistently show that YouTube has become the most significant channel for news consumption in Korea, surpassing Facebook, which remains dominant globally.⁴⁸⁾ This is unusual in comparative perspective, as most countries still identify Facebook as the leading social media source of news.

This heavy reliance on YouTube creates vulnerabilities. Algorithmic recommendation systems prioritize sensationalist and polarizing content, creating echo chambers that amplify conspiracy theories and politically motivated rumors. As Professor Eun-ryung

46) *Taiwan and the CCP's "Public Opinion Warfare"* (Central Police University, 2019), p. 47.

47) *Ibid.*, p. 49.

48) Korea Press Foundation, *2024 Social Media Use Survey*; Reuters Institute for the Study of Journalism, *Digital News Report* (2022–23).

Chung noted, “the influence of YouTube in Korea is extraordinarily large. It provides not just entertainment but also news, and that makes it a unique entry point for disinformation.”⁴⁹⁾

Another characteristic is the strength of online community culture. Gendered and interest-based forums such as FM Korea, DC Inside, and Women’s Generation function as powerful rumor incubators. According to Chung, “Koreans show a surprisingly high level of trust in online community discussions compared to global averages. This means that conspiracy-laden posts circulating in these spaces are more likely to be believed.”⁵⁰⁾ The combination of YouTube-driven exposure and community-driven trust creates fertile ground for rapid rumor diffusion.

4.2.2 Political Polarization and the Production of Disinformation

Like many democracies, South Korea is affected by political polarization. However, the Korean case is notable for the intensity with which false claims are weaponized during electoral cycles. Disinformation often manifests as targeted attacks on candidates, conspiracy theories about election fraud, or misleading statistics.

Chung emphasizes that the fact-checking model itself provokes heightened sensitivity: “Unlike explanatory journalism, fact-checking involves explicit verdicts—true, false, or misleading. Politicians interpret these verdicts as personal attacks, leading them to perceive fact-checkers as partisan opponents rather than neutral arbiters.”⁵¹⁾

This has produced a pattern of political hostility toward fact-checkers, including public denunciations and legal action. Even when courts acknowledged the legitimacy of fact-checking, politicians continued to frame verdicts as partisan interventions. The result has been an environment where disinformation thrives not only because of its viral potential, but also because efforts to counter it are delegitimized as biased.⁵²⁾

4.2.3 Institutional Fact-Checking: The Rise and Fall of SNU Fact-Check Center

The Seoul National University (SNU) Fact-Check Center, launched in 2017, was Korea’s most ambitious institutional effort to systematize fact-checking across the press. Its consortium model aggregated fact-checks from multiple participating outlets, with SNU serving as a coordinating platform.

Yet this ambitious model soon revealed structural vulnerabilities:

- **Financial Dependence** : The center relied heavily on external funding, notably from platform companies such as Naver. When political pressure increased, these companies withdrew their support. “Political actors understood that the most effective way to kill fact-checking was to cut the financial lifeline. That is exactly what they did,”

49) Interview with Prof. Eun-ryung Chung, June 2025.

50) Ibid.

51) Ibid.

52) Ibid.

Chung recalled.⁵³⁾

- **Political Pressure and Legal Threats** : Politicians frequently denounced fact-checks as partisan. Lawsuits were filed against Chung and other center leaders, even though judicial rulings recognized fact-checking as a legitimate journalistic activity. “We were sued not because our facts were wrong, but because politicians felt attacked by the verdicts themselves,” she explained.⁵⁴⁾

- **Structural Limitations of the Platform Model** : SNU Fact-Check did not itself conduct fact-checks; rather, it aggregated the work of member newsrooms. This created variation in quality. Some outlets invested substantial resources—TV Chosun, for example, began attaching full transcripts to its fact-checks—while others simply labeled opinion pieces as fact-checks.⁵⁵⁾

Despite these challenges, the initiative had lasting impact. Chung observed that “even skeptical newsrooms learned through experience that systematic verification raises professional standards. Some began adopting stronger sourcing practices than before.”⁵⁶⁾ The project thus left a mixed legacy: institutionally fragile but normatively influential.

4.2.4 Civil Society and Emerging Models

Following the closure of the SNU Fact-Check Center, civil society in Korea began experimenting with alternative approaches. The most notable initiative is Danbi News, a small non-profit newsroom launched by young journalists. Unlike the SNU model, which aggregated fact-checks from partner outlets, Danbi directly produces its own fact-checks and has aligned itself with the International Fact-Checking Network (IFCN) principles from its inception. Professor Eun-ryung Chung stressed: “we may be small, but from the very beginning we have followed every IFCN principle. That is the only way to secure legitimacy and credibility.”⁵⁷⁾

This model is distinct in its orientation toward everyday misinformation rather than exclusively focusing on political claims. For example, Danbi’s staff—mostly in their 20s—

have recently investigated rumors about revisions to the Act on the Protection of Children and Juveniles from Sexual Abuse, which were circulating on online communities. These fact-checks addressed questions such as whether “merely receiving illicit material via AirDrop” could lead to prosecution. According to Chung, “fact-checking must meet citizens at their own level, engaging directly with the rumors that circulate in their daily digital spaces.”⁵⁸⁾

53) Ibid.

54) Ibid.

55) Ibid.

56) Ibid.

57) Ibid.

58) Ibid.

Such strategies reflect a broader trend in global fact-checking, where organizations are shifting toward community-based verification and media literacy. Studies by Graves (2018) and the International Fact-Checking Network emphasize that sustainability requires not only verifying elite claims but also addressing the informational needs of ordinary citizens.⁵⁹⁾ In this sense, Danbi exemplifies an emerging model that is smaller in scale but more attuned to grassroots dynamics.

Despite these innovations, fact-checking in Korea continues to face structural vulnerabilities.

First, sustainable funding remains elusive. As Chung explained, “people say fact-checking is necessary, but no one is willing to pay for it. Citizens hesitate, media companies see it as a cost, and wealthy patrons fear political backlash if they fund journalism.”⁶⁰⁾ This structural weakness echoes global trends: research by Graves and Cherubini (2016) shows that most fact-checkers worldwide depend on platform partnerships or temporary grants, creating financial precarity.⁶¹⁾

Second, political hostility undermines institutional stability. Korean politicians often perceive fact-checking as partisan attack rather than democratic accountability. Chung recalled that even when courts upheld fact-checking as legitimate journalism, political elites continued to denounce it as biased: “we were sued not because our facts were wrong, but because politicians felt personally attacked by the verdicts.”⁶²⁾ This adversarial relationship deters long-term institutionalization.

Third, the economics of journalism discourage investment in fact-checking. As Chung noted, “fact-checks do not ‘go viral’ like sensational stories. For struggling newsrooms, they are a burden rather than an asset.”⁶³⁾ Korean news outlets under pressure for higher output often view fact-checking as labor-intensive with low commercial return.

In sum, the Korean fact-checking landscape is marked by both innovation and fragility. Civil society initiatives such as Danbi News demonstrate adaptability and integrity, but without secure financial and political foundations, the broader ecosystem remains precarious. As one comparative study of Asian fact-checking observed, “Korea’s fact-checking institutions illustrate both the promise of grassroots initiatives and the risks of overreliance on fragile funding models.”⁶⁴⁾

59) Graves, L., (2018). *Boundaries Not Drawn: Mapping the Institutional Roots of the Global Fact-Checking Movement*. *Journalism Studies*, 19(5–6), pp. 613–631.

60) Interview with Prof. Eun-ryung Chung, (June 2025).

61) Graves, L., & Cherubini, F., (2016). *The Rise of Fact-Checking Sites in Europe*. *Reuters Institute for the Study of Journalism*, University of Oxford, pp. 17–19.

62) Interview with Prof. Eun-ryung Chung, (June 2025).

63) Ibid.

64) Lin, T.T.C., (2020). *Fact-checking in Asia: A Comparative Study*. *Asian Journal of Communication*, 30(5), pp. 421–439.

4.3 Comparative Analysis: South Korea and Taiwan

South Korea and Taiwan both demonstrate the challenges democratic states face in responding to the spread of disinformation. Yet the two cases reveal markedly different patterns of threat and response, reflecting their distinct political, institutional, and media environments.

4.3.1 Sources, Media Ecosystems, and Disinformation Dynamics

Taiwan is primarily threatened by external interference from the PRC, which deploys disinformation as part of its broader cognitive warfare strategy. Campaigns are systematic, transnational, and designed to weaken social trust and electoral integrity. By contrast, South Korea's disinformation environment is more domestically generated, with rumors and false claims circulating through polarized political debates, online communities, and YouTube-driven ecosystems. While foreign influence cannot be entirely discounted, the dominant drivers are internal partisan conflicts.

Both countries also show platform-specific vulnerabilities. In Taiwan, the ubiquity of LINE as a messaging app makes it a primary channel for rumor dissemination. Civil society has therefore embedded fact-checking directly into LINE chatbots (e.g., Cofacts). In Korea, however, YouTube dominates news consumption—an anomaly globally—which fosters monetized echo chambers and algorithmic amplification of disinformation. In addition, Korea's strong online community culture serves as a unique incubator for conspiratorial narratives.⁶⁵⁾

4.3.2 Institutional Models, Political Environment, and Sustainability

Taiwan's fact-checking ecosystem is notable for being civil society-led, decentralized, and internationally integrated. Organizations such as MyGoPen, Cofacts, and the Taiwan Fact-Check Center (TFC) collaborate with platforms, citizens, and international networks while maintaining independence from the state. Their legitimacy derives not only from professional verification but also from public trust, built through transparency and responsiveness. As Robin Lee of MyGoPen explained, "our ultimate goal is for citizens to no longer need organizations like us, because they can judge information themselves."⁶⁶⁾ This reflects a preventive, civic-oriented philosophy that differs markedly from state-centered approaches elsewhere.

A second defining feature of Taiwan's model is institutional pluralism. Whereas South Korea concentrated resources into a single hub at Seoul National University, Taiwan has fostered multiple actors that coexist and even overlap in their work. Cofacts, for example, is entirely volunteer-driven and embedded directly in LINE conversations,

65) Korea Press Foundation, *2024 Social Media Use Survey*; Reuters Institute for the Study of Journalism, *Digital News Report (2022–23)*.

66) Interview with Robin Lee (MyGoPen), June 2025.

enabling immediate user participation in rumor correction. TFC, by contrast, maintains professional staff and applies more formal editorial standards. According to Eve Chiu, TFC's director, this diversity is not duplication but strength: "there is simply too much disinformation for one group to manage. By naming repeat offenders and holding them accountable, we complement the rapid-response style of other projects."⁶⁷

By contrast, South Korea initially adopted an institutional consortium model through the SNU Fact-Check Center (2017–2021). This platform aggregated fact-checks from more than 20 participating news outlets, with SNU serving as coordinator. However, its dependence on platform funding—primarily Naver—proved fatal. When political pressures mounted, financial support was withdrawn, leading to closure. As Prof. Eun-ryung Chung observed, "political actors knew the most effective way to undermine fact-checking was not censorship but cutting off money. And once the money dried up, the project collapsed."⁶⁸

The political environment further differentiates the two cases. In Taiwan, despite partisan competition, there exists a cross-party acknowledgment of the PRC threat. This creates space for fact-checking to be viewed as part of national defense rather than partisan weaponry. In South Korea, however, political elites frequently frame fact-checking as adversarial. Chung recalled multiple lawsuits: "we were sued not because our facts were wrong, but because politicians felt personally attacked by the verdicts."⁶⁹ Even when courts affirmed the legitimacy of fact-checking, politicians persisted in discrediting its role.

Finally, the question of sustainability underscores the divergent trajectories. Taiwan's NGOs struggle with limited funding, but their diversified structure—part professional, part volunteer—reduces vulnerability to a single funding source. International cooperation through the Global Fact network and partnerships with foreign fact-checkers also provide symbolic and material support.⁷⁰ In South Korea, the collapse of the SNU model revealed how overreliance on platforms and weak philanthropic culture left fact-checking with no fallback. Emerging actors such as Danbi News embody resilience and adherence to IFCN standards, but remain precarious in scale and funding. In sum, Taiwan illustrates how pluralistic, civic-centered institutions can sustain legitimacy even under relentless foreign disinformation attacks, while South Korea highlights how domestic political hostility and financial fragility can erode fact-checking capacity despite high professional standards.

67) Interview with Eve Chiu (Taiwan Fact-Check Center), June 2025.

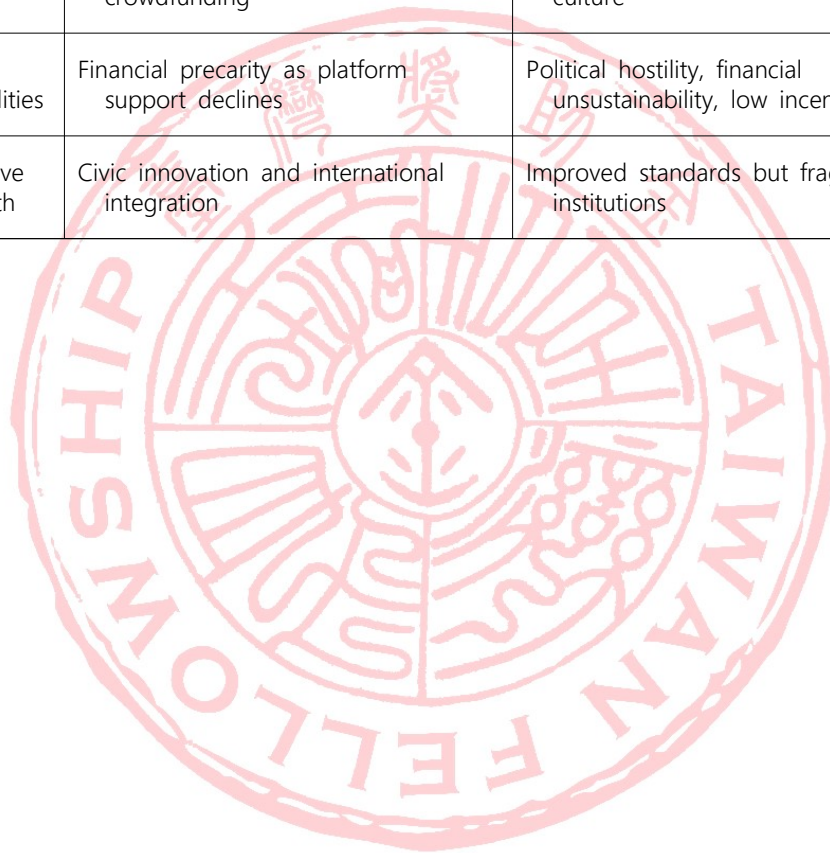
68) Interview with Prof. Eun-ryung Chung, (June 2025).

69) Ibid.

70) Lin, T.T.C., (2020). *Fact-checking in Asia: A Comparative Study*. *Asian Journal of Communication*, 30(5), pp. 421–439.

Table 2. Comparison of South Korea and Taiwan Fact-Checking Environments

Dimension	Republic of China (Taiwan)	Republic of Korea (ROK)
Disinformation Source & Media	PRC cognitive warfare; spread via LINE, Facebook, YouTube	Domestic polarization; spread via YouTube, online forums
Institutional Model	NGO-led (MyGoPen, Cofacts, TFC), decentralized, IFCN certified	SNU Fact-Check (defunct); Danbi News (small NGO-like)
Political Environment	Broad recognition of PRC threat; relative consensus	Politicians hostile; lawsuits, delegitimization of fact-checking
Funding Model	Platform partnerships, donations, crowdfunding	Reliant on platforms; weak donation culture
Key Vulnerabilities	Financial precarity as platform support declines	Political hostility, financial unsustainability, low incentives
Comparative Strength	Civic innovation and international integration	Improved standards but fragile institutions



5. Conclusion

Contemporary democracies confront a common challenge: the proliferation of disinformation. Yet the dynamics of this threat are not uniform; they manifest differently depending on each country's political, social, and geopolitical context, and the responses likewise reflect distinct institutional and cultural environments. South Korea and Taiwan, the two cases analyzed in this study, share the characteristics of being open democracies with high dependence on digital platforms, but the nature of the threat and the modes of response diverge significantly. Taiwan stands at the frontline of the Chinese Communist Party's cognitive warfare, which goes beyond episodic electoral interference to constitute a long-term strategy aimed at eroding social trust and undermining the legitimacy of democratic institutions. South Korea, by contrast, has experienced some external pressures—including from North Korea—but the decisive drivers of disinformation have been internal: intense political polarization, vulnerabilities in the media structure, and the economic and algorithmic logics of digital platforms. In short, Taiwan's challenge stems primarily from external pressures, while Korea's stems more fundamentally from internal vulnerabilities.

The patterns of response reflect these conditions. Taiwan has developed a pluralistic ecosystem led by civil society organizations such as MyGoPen, Cofacts, and the Taiwan Fact-Check Center, which combine rapid verification, accountability for repeat offenders, and integration of media literacy into schools. The government, framing "cybersecurity as national security," has partnered with these organizations and engaged in international coalitions. Yet structural challenges remain, particularly in terms of sustainable funding. Korea, by contrast, initially experimented with the Seoul National University Fact-Check Center, a consortium model that coordinated across news outlets. This experiment ultimately proved unsustainable amid political hostility and financial dependence on platforms. Even so, Korea's trajectory did not end there: it has since shifted toward smaller nonprofit media and citizen-driven projects. These initiatives remain limited in impact but embody a new phase of experimentation and resilience, with outlets such as Danbi News adhering strictly to International Fact-Checking Network (IFCN) principles. This suggests that despite institutional fragility, Korea continues to search for viable models, reflecting a democratic dynamism that deserves recognition.

Looking forward, the two countries face distinct challenges. Taiwan must navigate an increasingly uncertain geopolitical environment, including the potential return of Donald Trump to the U.S. presidency and escalating U.S.–China tensions. These shifts will directly affect not only Taiwan's security but also its information environment. To remain resilient, Taiwan must further diversify resources, reduce dependency on external funding streams, and institutionalize long-term media literacy programs to strengthen citizens' critical capacities. Korea, meanwhile, must confront its adversarial political environment by fostering a social consensus that regards fact-checking as a democratic

public good rather than a partisan weapon. This requires strengthening newsroom standards, expanding citizen participation in the verification process, and institutionalizing public funding mechanisms to ensure financial stability. Korea's experience, while marked by institutional setbacks, demonstrates a capacity for recovery and adaptation that should not be overlooked.

The comparative analysis also underscores the importance of mutual cooperation and international solidarity. Taiwan's decentralized and rapid-response fact-checking model offers lessons for Korea, while Korea's prior experiences with inter-newsroom collaboration and the persistence of citizen-based models under political hostility can inform Taiwan's strategies. Given their shared context as Asian democracies, the two countries could benefit from joint workshops, cross-border fact-checking projects, and platforms for information exchange. More broadly, their experiences should be integrated into multilateral democratic alliances with the United States, the European Union, Japan, and others. Such cooperation should not be confined to technical assistance but must include collective responses to authoritarian information operations, mutual learning around democratic values, and long-term investment in civil society capacity.

Ultimately, the central challenge for both South Korea and Taiwan is that of sustainability. Disinformation is not a temporary phenomenon tied to a single election cycle or political episode; it is a long-term structural threat to democratic governance. Responses must therefore go beyond ad hoc projects to become systemic and durable efforts involving governments, civil society, media organizations, and digital platforms. Taiwan demonstrates that external threats can be met with civic innovation and international solidarity, while Korea shows that even under conditions of political hostility and financial fragility, new models can be tested and democratic resilience can endure. Taken together, the two cases suggest that defending democracy against disinformation requires more than technical verification; it requires the rebuilding of trust, reinforced by both internal reforms and international democratic cooperation.

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