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A Policy Perspective on Regulating Disinformation in Romania during the Covid-19 Pandemic

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Abstract

Romania is one of the countries that adopted temporary sanctions against disinformation during the state of emergency, which lasted between March 16 and May 14, 2020. The scope of this paper is to analyze the decisions adopted by the National Authority for Administration and Regulation of Communications, which was the institution responsible for regulating the spread of fake news on the internet. We analyzed the motivation to block access to false information and the type of news classified as disinformation. In addition, we analyzed decisions adopted by the National Council of Audio-visual starting with the end of February 2020, both in terms of recommendations and the sanctions imposed on audio-visual channels of communication, as well as the decisions to sanction noncompliance with the correct information of the audience. The findings show a limited effect in containing disinformation. Access to a limited number of websites was blocked and after the state of emergency was lifted, access was granted again. Removing access to a website did not stop the authors from continuing their activity by opening a new website. The lack of a definition of false information allowed discretion power in blocking access to news containing information that later proved to be correct. The activity of audio-visual channels was regulated instead through soft legislation, such as recommendations and instructions, as well as through sanctions. Overall, the analysis shows temporary and limited effects of the legislation sanctioning disinformation in Romania.

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Keywords:

censorship, COVID-19 pandemic, disinformation, freedom of expression, Romania

1. Introduction

Access to information and having the opportunity to discuss it freely is vital for citizens to cope with critical situations that disrupt their daily life and to comply with health policies during a pandemic (Christensen & Lægreid, 2020; Radu, 2022). However, the COVID-19 pandemic illustrated many instances when citizens were intentionally provided with fake and misleading news that diminished their capacity to correctly assess the information and act adequately in certain situations (Vese, 2021; Lovari, 2020). Manipulation and disinformation of citizens took many forms, such as conspiracy theories about the virus' origin or the influence of some countries over the pandemic. There was much speculation about the anti-coronavirus vaccines that were portrayed as being intended to introduce a microchip inside the human body. Fraudsters, and even political leaders, attempted to benefit from citizens' fear and lack of information, and they advertised miraculous medicines that could treat those who contracted the virus (Harrison, 2021), therefore, increasing the health risks for those individuals willing to try alternative treatments (Hassanian-Moghaddam et al., 2020). In other cases, mass media presented information in such a way as to create panic among citizens. The World Health Organization coined the parallel crisis of fake news and misinformation as an infodemic. It warned that it lowers trust in health officials and undermines the effective health response against containment of the pandemic. However, in general, studies show that a low level of trust in public institutions and a high fear of information manipulation lead to a low level of policy compliance (Radu, 2021; Kozel & Dečman, 2022).

There is a broad discussion and a dilemma about how to keep a balance between protecting citizens against disinformation and upholding freedom of expression and access to information, as the criticism of governmental actions is a safeguard of democracy (Myung & Jung, 2022; Tenove, 2020; De Blasio & Selva, 2021). Another dilemma regards who should be responsible for fighting against disinformation. Previous literature identified the following four main actors: public institutions, media companies (including social platforms), professionals, and the public (Lazer et al., 2018; De Blasio & Selva, 2021). Their involvement depends on the degree of state control over public information and the level of transparency and responsiveness required from media companies for published information. Any direct intervention of public institutions raises concerns about censorship. At the same time, it is uncertain whether the efforts to improve individuals' skills to evaluate the quality of information will persist over time. Platforms could detect the automated dissemination of news by bots, but some might go undetected. Even the efforts of professionals to fact-check the

news face difficulties in covering the large amount of news that is produced. The COVID-19 pandemic magnified all these challenges.

The present article focuses on the challenges of direct regulation by the government to prevent disinformation during the COVID-19 pandemic. The analysis is on Romania, which was among the countries that adopted sanctions against disinformation through legislation regulating the state of emergency. On March 16, 2020, the first Presidential decree that established the state of emergency was adopted for 30 days, and on April 14, 2020, it was extended for another 30 days until May 14, 2020, when the state of the emergency was lifted and replaced with the state of alert. Preventing, identifying, and sanctioning disinformation was considered an important tool to maintain citizens' trust in public institutions and to encourage their compliance with public institutions' recommendations or mandatory requirements.

Other countries used the COVID-19 pandemic as an opportunity to introduce stronger legislation against disinformation and even to criminalize fake news (Commissioner for Human Rights, 2020). For example, in March 2020, the Hungarian Parliament passed new emergency legislation which punished the spread of misinformation with up to five years of imprisonment (Cox, 2020). It aimed to consolidate illiberal democracy (Hajnal et al., 2021). In some countries, such as the US and UK, whistleblowers, especially medical workers, faced pressure from public authorities not to speak out about the working conditions or about the development of the pandemic (Abazi, 2020; Committee to Protect Journalists, 2020). In other countries, such as India, the prime minister demanded that journalists not publish information about the pandemic without the government's approval (Radu, 2020). Some governments from Asia and North Africa used the pandemic as a pretext to silence unrelated criticism (Vese, 2021). All these attempts to censor information, control the narrative about the pandemic and restrict citizens' and press' freedom of expression were criticized (Abazi, 2020; Mîrza, 2021).

This article aims to analyze the legal instruments used by Romanian public authorities to prevent disinformation during the COVID-19 pandemic and to highlight their efficacy and limitations. The analysis is from a public policy perspective and aims to add to the research on disinformation and fake news conducted in Romania. Corbu et al. (2021) investigated the factors that influenced Romanians' compliance with restrictive measures at the beginning of the COVID-19 pandemic and found that compliance was higher among individuals who trusted information received from official institutions but also among those who believed conspiracy theories that were circulating at the time of the outbreak of the pandemic. Mogoș et al. (2022) found several negative frames associated with anti-COVID-19 vaccines that were disseminated on social media platforms and encouraged vaccine hesitancy and resistance among Romanian citizens. A survey conducted in Romania in April 2021 showed that people, who perceived a higher incidence of fake news received information from social media, had a lower level of education and a higher level of religiosity, and were more inclined to trust misleading information about the COVID-

19 pandemic (Buturoiu et al., 2021). The research conducted among several professional groups highlighted the need for credible information during the pandemic. For example, a study conducted among Romanian healthcare professionals found that the spread of misinformation regarding the availability of alternative treatments influenced their trustworthiness and their relationship with patients (Coman et al., 2022). Cepoi et al. (2023) found that misinformation released during the lockdown period discouraged the probability of informed trading on the Romanian stock market. Interviews conducted with journalists at the beginning of the vaccination campaign in 2021 revealed a general agreement among respondents that press materials should use information from official and credible scientific sources and should fight fake news and misinformation about the anti-coronavirus vaccine (Mureşanu & Sălcudean, 2022). However, a pilot study conducted at the beginning of the pandemic found that even credible media outlets published news that contained misleading, manipulated, or fabricated information (Palade & Balaban, 2020).

The research conducted on disinformation and fake news in Romania lacks an analysis of the challenges of adopting regulations to combat the spread of disinformation, as well as a reflection on the limitations and risks of such an endeavor. In the following section, we will present different approaches used by different countries to address disinformation ranging from self-regulation to direct government regulation. In section three, we will present the Romanian legislation that existed before the pandemic, but also that adopted at the beginning of the COVID-19 pandemic through the state of emergency legislation. Section four presents the methodology used to conduct the analysis, while section five presents the findings. We will conclude by discussing the challenges of criminalizing disinformation, and the efficacy of the legislation.

2. Approaches to tackling disinformation

In order to discuss the approaches to combat the spread of disinformation, an unequivocal and detailed definition is required. The defining elements of disinformation are the misleading nature of the information, the intention of the actor to cause public harm (which does not need to have occurred), and economic or political gain (Ó Fathaigh et al., 2021; Egelhofer & Lecheler, 2019; European Commission, 2020). Disinformation is often discussed in opposition to misinformation, which also refers to disseminating false information, but without harmful intent. Some authors consider disinformation synonymous with fake news, but disinformation goes beyond that as it takes more forms than news. Fake news takes some forms of credibility by appearing similar to real news or in a journalistic format, but is low in facticity, is created to deceive (Tandoc, Lim & Ling, 2018; Egelhofer & Lecheler, 2019), and lacks the procedures to ensure the accuracy and credibility of the information (Lazer et al., 2018).

Much disinformation occurs on social media, an unregulated medium driven by revenue and political motivation (Tucker et al., 2018). Every time a reader clicks on an article on social media, the clicks are converted into advertising revenues; this is the mechanism through which people are incentivized to get involved in the production of sensational and emotional headlines (Egelhofer & Lecheler, 2019) or fabricated news in order to attract more readers. Another motivation is political because some fake news producers intentionally interfere in public discussions and discredit some public figures to push their own agenda (Tandoc, et al., 2019). The lack of procedures to verify the information and ensure its credibility facilitates the spread of fake news (Tandoc, Lim & Ling, 2020). People are more vulnerable to fake news when they do not trust public institutions or in contexts marked by social tensions, such as political, racial, or cultural (Tandoc, Lim & Ling, 2018).

There is a general awareness of the harmful consequences of fake news for citizens and society. The COVID-19 pandemic highlighted, to a greater degree, the devastating consequences of disinformation on citizens' compliance with mandatory regulations and participation in vaccination campaigns. The pandemic created a window of opportunity to adopt countermeasures to limit the spread of disinformation, which vary, based on their intensity, on a continuum from soft to hard law decisions (Radu, 2020; International Press Institute, 2020b). There is no consensus among countries how to deal with disinformation, as instead, there is a 'patchwork of national rules' (Harrison, 2021). Durach et al. (2020) classify measures to address disinformation into four categories: self-regulation, co-regulation, direct regulation, and audience-centered approach. Prior to the COVID-19 pandemic, an analysis of counter-disinformation policies adopted by eleven European countries (De Blasio & Selva, 2021) identified four models of social platform accountability: accountability set by law, codecided accountability, regulated self-regulation and pure self-regulation.

The self-regulation approach refers to the voluntary decisions of online platforms (such as Facebook, Twitter, YouTube, Google, and the like) to combat misinformation about the virus and to take down fraudulent content (Niemiec, 2020). For example, Facebook introduced pop-ups containing information from the World Health Organization, while Twitter and YouTube introduced warnings of content that contradicted information provided by authorities. Even though the contribution of social media platforms to the communication of more accurate information was significant, the accuracy of algorithms used to differentiate intentionally fake information from genuine false information in a rapidly changing environment was questioned. In some cases, companies that hosted websites complained that they needed clear guidelines regarding the type of information that should be or should not be on the Internet because 'it should not be up to them to police speech online' (O'Sullivan, 2022). Social media platforms' efforts to combat disinformation fit more into the co-regulation approach.

Co-regulation approach (Durach et al., 2020, p. 9) refers to the European Union's efforts to allow Internet platform companies to implement a series of measures by

setting up some expectations on how to combat disinformation. For example, on May 26, 2021, the European Commission published the 'Commission Guidance on Strengthening the Code of Practice on Disinformation' (European Commission, 2021), which was the foundation for the 'Strengthen Code of Practice on Disinformation' signed on June 16, 2022, by 34 signatories (online platforms such as Meta, Microsoft, Google, Twitter and TikTok, specialized platforms, fact-checkers, and the like). The Commission does not endorse the Code, but the Code fulfills the expectations set out in the guidelines. The companies that signed the Code decide which measures to implement, and it is their responsibility to implement them properly.

In the context of the COVID-19 pandemic, many countries directly regulated fake news and adopted measures that allowed the removal of unlawful online content and suspended access to websites. In some countries, emergency legislation criminalized fake news and entitled public authorities to give fines or even imprison individuals who intentionally spread false information. Hungary's legislation on disinformation passed on March 30, 2020, is perhaps the most commented one because the spread of fake news was punishable by up to five years imprisonment. Other countries criminalized the spread of false information, such as Uzbekistan, which in early April 2020 passed temporary amendments to punish the spread of false information with two years of correctional labor and creating panic through fake news with up to three years imprisonment (International Press Institute, 2020b). In some countries, the new legislation was limited to being valid only during the state of emergency (as was the case of Romania),

In contrast, in more autocratic countries, disinformation provisions were permanently included in the criminal and civil codes (International Press Institute, 2020b). We also have to mention the case of some EU member states that adopted legislation on fake news before the COVID-19 pandemic started. For example, in 2015, Lithuania passed a Law on the Provision of Information to the Public, which prohibited intentionally disseminating disinformation, defined as false information. In 2017, the German Federal Parliament adopted the Network Enforcement Act to combat fake news and misinformation by requiring social media platforms to remove illegal content; otherwise, they could be fined. However, in some countries, legislation on coronavirus-related fake news was repelled out of fear of censorship and the abolition of media freedom (Radu, 2020) or after pressure from the European Union and OSCE (International Press Institute, 2020b). For example, in Bulgaria, draft legislation, which granted the media regulator the power to suspend the activity of websites for distributing fake news, was rejected (Van Hoboken & Ó Fathaigh, 2021). Similarly, in Serbia, a government decree that centralized information related to the COVID-19 pandemic was revoked (Radu, 2020).

Another regulation that indirectly affected the media's capacity to present accurate information was the extension of deadlines public institutions have to respond to FOIA requests. Hungary, Romania, Spain, Turkey, Serbia, and Bosnia and Herzegovina adopted emergency legislation to restrict access to public information

(International Press Institute, 2020, 2021). In Romania, the deadline doubled, while in the Republic of Moldova, it tripled (Mîrza, 2021).

Those who criticize the strong regulation of disinformation propose audience-centered activities (Durach et al., 2020; Grimes, 2020) aimed at increasing media literacy or eHealth literacy that would enable the population to differentiate between false and true information through developing critical thinking and verifying the information. However, public institutions should cultivate eHealth literacy throughout the lifespan and should target all age groups in society (Dib et al., 2022). In order to increase access to accurate information, governments of different countries spent public funds on information campaigns aimed at providing citizens with messages on how to protect themselves and their families against COVID-19 and encouraging the population to get the vaccine. For example, the UK Government paid media organizations to air public information campaigns (Digiday, 2020); public spending was considered to be financial support for the newspapers that faced a drop in advertising revenues during the pandemic. In some cases, public authorities posted videos on Facebook that contained warnings about the dangers of disinformation (Van Hoboken & Ó Fathaigh, 2021). In other cases, a private company scrutinized websites containing health information and gave a certification that the websites contained reliable information (Health on the Net (HON) certificates, www.hon.ch).

Even though some of the new pieces of legislation adopted at the beginning of the COVID-19 pandemic stem from the intention to combat disinformation and reduce the exposure to false news, organizations defending the freedom of the press considered them as being a limitation or a threat to the activity of journalists. One argument was that a clear definition of disinformation was missing or, where it was offered, the definition was vague and therefore, it could be easily manipulated (International Press Institute, 2020b). In addition, the legislation was adopted in a short period of time without the consultation of journalists' associations and gave too much authority to governments that could use the law to silence opposition. According to Transparency International Hungary (2020), the state of emergency, including restrictions on citizens' rights, should be limited in time and should be subject to parliamentary review every 30 days.

Since February 2020, the International Press Institute (IPI) monitored press freedom restrictions during the COVID-19 pandemic, and on August 30, 2022, IPI reported 473 violations linked to covid-19 coverage (International Press Institute, n.d.). Worldwide, IPI identified 95 violations related to censorship on media and journalists covering Covid-19 that were caused by: 34.7% (33) websites blocked, 7.37% (7) forced closure of media outlets, and 57.89% (55) publication ban, take-down order or forced deletion. In Europe and Asia, 94.27% and 100%, respectively, of the violations related to censorship of media were related to publication ban, take-down order, or forced deletion, and in the Americas 76.32% were related to websites blocked. In terms of restrictions on access to information, on August 30, 2022, IPI reported 102 violations that were caused by access restricted to officials/press conferences (36.27%),

FOI rules suspended/deadlines extended (8,82%), travel restrictions/bans (6,86%), and press passes/accreditations revoked or denied (48.04%). Most of the FOI rules suspended or deadline extended were in Europe (8 out of 9 such violations).

In the following section the general legislative framework for preventing the spread of disinformation is analyzed, as well as the legislation provisions adopted in Romania in the context of the COVID-19 pandemic.

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The following section analyzes the general legislative framework for preventing the spread of disinformation, as well as the legislation provisions adopted in Romania in the context of the COVID-19 pandemic.

3. Romanian legislation to prevent disinformation

3.1 Constitutional provisions

Before the pandemic, Romanian legislation already included provisions for protecting citizens' rights and freedoms and the conditions under which they can be restricted.

Romanian Constitution, Article 30, guarantees citizens' right to freedom of expression and prohibits censorship of any kind or suppression of any publication. Freedom of expression cannot prejudice the dignity and honor of a person, and the Constitution prohibits incitement to racial hatred. Article 31 of the Constitution guarantees the right to information of public interest, as public authorities must ensure the correct information for the citizens on public affairs and issues of personal interest. However, the right to information should not prejudice the measures to protect national security. According to Article 53 of the Constitution, the exercise of certain rights and freedoms can be restricted by law to protect public health, among other public interests. The restriction must be proportional to the situation that determined it should be applied in a non-discriminatory manner without affecting the existence of the right or freedom (Article 53, para. 1). According to Article 4 of the Government Emergency Ordinance No. 1/1999 adopted through Law No. 453/2004, 'during a state of siege and state of emergency, the exercise of some fundamental rights and freedoms can be restricted, except for human rights and fundamental freedoms, only to the extent that the situation requires it.' In addition, according to Article 3 of the same ordinance, during a state of siege or state of emergency, the following actions are prohibited: 'limitation of the right to life, torture, and punishments or inhuman or degrading treatments, a conviction for crimes not punished as such according to national or international law, and restriction of free access to justice.'

3.2 Legislation to prevent disinformation adopted through emergency legislation at the beginning of the COVID-19 pandemic

In Romania, Presidential Decree No. 195 from March 16, 2020, which established the state of emergency, granted the National Authority for Administration and Regulation of Communications (NAARC) the authority to order the removal of online information that promotes false news regarding the evolution of COVID-19 and the protection and prevention measures (Art. 54). In addition, the providers of electronic communication networks, based on the reasoned decision of the NAARC, had an obligation to immediately block the access of users from Romania to the content promoting false news regarding the evolution of COVID-19 transmitted in an electronic communications network by persons not under the jurisdiction of national law. The decree did not define what was classified as false news, only that it had to be related to the COVID-19 pandemic. Therefore, public institutions had the discretion to decide what to include in this category.

The legal procedure decide to remove online false information or block access to a website was the following. The NAARC made the decision based on the recommendation of the Strategic Communication Group established under the coordination of the Department for Emergency Situations, a unit within the Ministry of Internal Affairs. NAARC then communicated the decision to the company that administered the website promoting false information or to the providers of electronic

communication networks from Romania if a foreign company administered the website. Non-compliance with the decision constituted a contravention and was sanctioned with a fine between 1,000 and 70,000 RON (approximately between EUR 200 and EUR 14,000). The decisions could be challenged in administrative litigation at the Bucharest Court of Appeal within 30 days of the communication without going through the preliminary procedure provided by the administrative litigation.

Presidential Decree No. 195 was extended by Presidential Decree No. 240 from April 14, 2020, for another 30 days, until May 14, 2020. After the state of emergency ended, starting on May 15, 2020, the restrictions on the websites that had previously published false news were lifted, and access was once again granted.

3.3 Legislation to prevent disinformation by audio-visual media service providers

Before the pandemic, Romania already had legal provisions that sanctioned disinformation, even though the exact word disinformation was not used. Decision No. 220/2011 regarding the Code for regulating audio-visual content provides general guidelines regarding the correct information for the public through the use of credible sources of information, accurate presentation of the news, and presentation of all opposing perspectives of news in order for every citizen to form their own opinion (Art. 64, 65 and 66 of the Code). In addition, Art. 73 prohibits promoting cases of a person being cured of serious diseases with the help of conventional or non-conventional treatments if the diagnosis and the medical documents confirming it have yet to be certified by the Romanian College of Doctors or by similar institutions from abroad. News on disasters and collective tragedies must be presented with decency, without creating panic or repeating unjustifiably shocking images (Art. 75). Non-compliance with these provisions is sanctioned according to the audiovisual Law No. 504/2002 first with a warning containing the precise conditions to enter into legality, and in cases where the audio-visual provider does not comply with the terms and under the conditions established by the warning or violates these provisions again, a contravention fine between EUR 1,000 and EUR 20,000 is applied.

During the pandemic, between February 18, 2020 and August 31, 2021, in addition to already existing legal provisions, National Council for Audio-visual (NCA)[2] issued nine recommendations and three instructions[3] through which audio-visual media service providers were given guidelines to ensure correct information for the public about the COVID-19 pandemic and the vaccination campaign and to

2 National Council for Audio-visual is an autonomous authority under the control of Parliament. Its mission is to ensure a climate based on free expression and responsibility towards the public, and it is the only regulatory authority in the audio-visual field (www.cna.ro).

3 Instructions are documents that contained general guidelines for preparing and presenting the news. In contrast, recommendations contained requests for disseminating specific messages of public interest to prevent the spread of the virus or to encourage vaccination.

discourage the transmission of scientifically undocumented information or to use sources of documentation that do not exist in reality. The three instructions issued by the National Audio-visual Council requested audio-visual service providers to draft the news with rigor and accuracy, to use official and reliable sources of information, to verify any information related to the subject of COVID-19, to avoid an overabundance of information that can create confusion, and not to stimulate the emotional side or to create panic and insecurity among citizens. In addition, the National Audio-visual Council requested to counteract conspiracy theories, reject hate speech claiming that an ethnic or religious group is responsible for the COVID-19 pandemic, and ensure a debate based on the advice provided by specialists.

Based on the requests of the Ministry of Internal Affairs, the National Audio-visual Council adopted nine recommendations through which it requested audio-visual service providers to disseminate messages of public interest aimed at informing the public on different issues related to the COVID-19 pandemic. Examples of such messages of public interest are: 'Protect yourself and your family! Wash your hands often with soap and water, cover your nose and mouth with your arm when you sneeze or cough, wear a protective mask, and get a flu shot!' (NCA Recommendation from February 18, 2020), 'Save lives, keep your distance, be responsible!' and a spot regarding online payments, card payments, and via GISEUL.ro (NCA Recommendation from May 28, 2020), and the spot 'Person to person, we stop the pandemic' that refers to the vaccination campaign (NCA Recommendation from February 2, 2021). The recommendations contained information about the period for which the audio-visual service providers from national, regional, and local levels should broadcast the spot.

3.4 Regulating access to information of public interest during the state of emergency

According to Presidential Decree No. 195/2020 Article 56, during the state of emergency, the legal deadlines for answering the requests for access to public information under the FOIA and petitions were doubled. Therefore, the deadlines for answering requests under FOIA increased from 10 to 20 days for simple information and from 30 to 60 days for complex information. The deadline for answering petitions increased from 30 to 60 days. These legal provisions were applicable until May 14, 2020, when the state of emergency was lifted.

3.5 Financial support for mass-media

Starting on May 15, 2020, after the state of emergency was lifted, the Romanian Government allocated 200 million RON (approximately EUR 405,000) to mass media for an information campaign on topics related to COVID-19. The information campaign was scheduled to last four months. It contained messages to prevent and limit the spread of COVID-19 and how to resume social and economic activities after

the end of the state of emergency. The Government considered the financial allocation as being financial support for mass media affected by the pandemic and aimed to prevent negative consequences in terms of ensuring citizens' correct and balanced information in critical periods when access to information is essential. Most funds were allocated to television stations, then to online media, radio stations, and printed newspapers.

4. Methodology

The goal of this article is to analyze the legislation adopted to combat disinformation in Romania during the state of emergency and to highlight its effectiveness, limitations, and risks. In this regard, we conducted a content analysis of the decisions adopted by the National Authority for Administration and Regulation of Communications (NAARC), the institution responsible for sanctioning the spread of fake news on the internet. The NAARC adopted 21 decisions between March 16, 2020 and May 14, 2020 (the duration of the state of emergency in Romania). All these decisions are available online on the NAARC's website, except for one that is missing because a totally different document was wrongly uploaded in its place. Out of 20 decisions available, five of them announced the NAARC's decision to cease the previous measures adopted against websites that posted false information because the emergency situation ended in Romania starting on May 15, 2020, and therefore the legal provisions were no longer applicable. Therefore, we conducted a content analysis of 15 decisions regarding the false information posted on 15 websites. Appendix 1 contains a synthesis of these decisions.

We collected information about the following:

a) the websites that spread false information and the location of companies that hosted them,
b) the type of news that NAARC classified as false information,
c) the motives to block access to false information,
d) the sanctions applied,
e) whether the websites contested the decisions,
f) whether the websites continued to publish news classified as false news after an initial sanction or switched to another website,
g) whether the sites exist in March 2023 (the date of the last revision of this article).

In addition, we analyzed decisions adopted by the National Council of Audio-visual (NCA) starting at the end of February 2020 regarding recommendations and the sanctions imposed on audio-visual communication channels. Even though we did not conduct a systematic analysis of the decisions, it is vital to have a view of the activity of the NCA because disinformation spread through television and radio has a much higher impact due to numerous audiences. Therefore, we limited the analysis to the

decisions adopted until June 2020.

5. Findings

5.1. Sanctioning disinformation by internet providers

The content analysis of the NAARC's decisions to which we had access illustrates that there were 15 websites where the NAARC either blocked access to articles or to the entire website. In two cases websites were similar as in the case of https://ortodoxinfo.ro and https://ortodox.info.ro, and http://www.new-romania 24h.xyz and www.r.news-romania24h.xyz. The website https://ortodox.info.ro was created after the NAARC made the decision to block access to the website https://ortodoxinfo.ro. The NAARC found that some of the articles published on https://ortodoxinfo.ro, which was first closed, were republished on the newer site that had a format very similar to the previous one.

Table 1:

Analysis of the websites blocked through the NAARC's decisions

	Websites	Location of the company hosting the website	Website active in March 2023
1.	https://danielvia.wordpress.com	USA (no information about the city)	No
2.	https://ortodox.info.ro	San Francisco, USA	No
3.	https://ortodoxinfo.ro	San Francisco, USA	Yes
4.	https://romania-veche.ro	Bistrița, Romania	No
5.	https://veghepatriei.wordpress.com	USA (no information about the city)	No
6.	https://vremuriturburi.com	USA (no information about the city)	No
7.	www.blacktopics.wordpress.com	USA (no information about the city)	No
8.	www.bpnew.ro	Sighetu Marmației, Romania	No
9.	www.breakingnews.xyz	San Francisco, USA	No
10.	www.cohortaurbana.ro	Sfântu Gheorghe, Romania	No
11.	www.genocid.ro	Bucharest, Romania	Yes
12.	www.justitiarul.ro	Bistrița, Romania	Yes
13.	www.new-romania24h.xyz	Server outside Romania	No
14.	www.r.news-romania24h.xyz	Server outside Romania	No
15.	www.stiridemoment.ro	No information	No

Source: author's own, 2023

In nine out of 15 cases, websites were hosted by companies outside Romania. In seven cases, the companies were situated in the USA (three were located in San Francisco, USA) (see Table 1). In the case of companies from Romania, they were located in different cities throughout the country, such as Bucharest, Sfântu Gheorghe, Bistrița, and Sighetu Marmației. The NAARC identified that one company from

Bistrița hosted two websites (https://romania-veche.ro and www.justitiarul.ro). In March 2023, only three of the 15 websites were active. In one case, the most recent articles published were from June 2021. According to the information extracted from the NAARC, when the decision to block access to five articles published on the website www.stiridemoment.ro was made, the website was no longer active. Thus, the measure of elimination at the source of several articles containing false information was no longer relevant.

Most of the decisions against disinformation were to block access to the websites. In three cases, the decisions were to block access to articles. However, in two of these cases, the NAARC made a subsequent decision to block access to websites because they continued to publish false information (see Table 2). In the other case, when the NAARC adopted the decision, the website was no longer active. Just one company contested the NAARC's decision (www.justitiarul.ro), and, as a consequence, access to this website was granted again with the requirement to block access to two articles. However, the NAARC revised the decision the next day and decided to block access to the website again because it had continued to post false information.

Table 2:

Types of NAARC decisions to sanction disinformation

	Websites	Decisions
1.	www.stiridemoment.ro	block access to 5 articles
2.	www.bpnew.ro	26.03.2020 – block access to one article 16.04.2020 – block access to the website
3.	www.breakingnews.xyz	immediately block access to the website
4.	www.cohortaurbana.ro	block access to the website
5.	www.blacktopics.wordpress.com	immediately block access to the website
6.	www.r.news-romania24h.xyz	immediately block access to the website
7.	www.new-romania24h.xyz	immediately block access to the website
8.	www.genocid.ro	block access to the website
9.	https://veghepatriei.wordpress.com	immediately block access to the website
10.	https://vremuriturburi.com	immediately block access to the website
11.	http://romania-veche.ro	block access to the website
12.	www.justitiarul.ro	23.04.2020 – block access to the website 29.04.2020 – The company contested the previous NAARC decision and the NAARC decided to permit access to the website, but to block access to two articles. 30.04.2020 – block access to the website because it had continued to post false information
13.	https://ortodoxinfo.ro	immediately block access to the website
14.	https://ortodox.info.ro	immediately block access to the website because it had continued the disinformation campaign started through the old website https://ortodoxinfo.ro
15.	https://danielvia.wordpress.com	immediately block access to the website

Source: author's own, 2023

Since the companies that hosted the websites had the right to start administrative litigation against the NAARC's decisions at the Bucharest Court of Appeal, we checked for cases brought against this institution related to the decisions to block access to websites. We did not find any legal complaints submitted by the companies that had had their websites blocked. In addition, there was no decision made by the Constitutional Court of Romania regarding the limitations on freedom of expression during the state of emergency, as no complaint had been brought by the Romanian Ombudsman or any other party to the Constitutional Court.

The Presidential Decrees that established the state of emergency and introduced sanctions against disinformation did not include a definition of false information, only that it should be related to the COVID-19 pandemic. Therefore, we extracted those elements used to define information as disinformation from the NAARC decisions. Definitions of disinformation encountered in the literature argue that it has a misleading nature of the information, intends to cause harm (which does not need to have occurred), and economic or political gain. It was impossible to analyze the gain obtained out of disseminating disinformation; therefore, we concentrated on the other two elements. Table 3 summarizes the elements that we identified. Finally, we found that many articles did not cite the official sources used to document the information analyzed or presented information that contradicted the statements of public institutions or associations of private companies.

In many cases, articles either overestimated or underestimated the real danger of the pandemic and presented different types of conspiracy theories. In some cases, a discrepancy existed between the title of articles (which was alarming and had the intention to capture attention) and the content of the article. In the case of one website, there was a suspicion that some of the authors had not used real names.

Table 3:

Elements used by the NAARC to classify information as disinformation

	Characteristics of disinformation	
1.	Type of information	News does not cite official sources used for documentation.
		Information contradicts the statements of public institutions or associations of private companies.
		Overestimation or underestimation of the real danger of the pandemic
		Some authors used fake names.
		The news was created using different conspiracy theories.
		There is no strong connection between the title of the article (which is alarming) and the content of the article.
2.	Intention of disinformation	To create panic
		To induce unjustified fears or a state of artificial social dissatisfaction
		To weaken the credibility of public institutions responsible for the management of the pandemic
		To lower trust in some professional categories, such as medical staff
		To instigate disobedience against restrictive measures

Source: author's own, 2023

The conspiracy theories promoted by these websites were about

- the scarcity of food,
- the extermination of pensioners in concentration camps,
- the reduction of the population,
- the beginning of a new world war,
- the introduction of microchips into the human body through vaccination,
- increasing the profit of Big Pharma,
- and artificial creation of coronavirus in a laboratory.

More specific examples of articles that promoted conspiracy theories can be found in Appendix 1. Disinformation intended to alarm the population and create panic, create unjustified fear, weaken the credibility of public institutions responsible for the management of the pandemic, lower trust in some professional categories, such as medical staff, and overall instigate disobedience against restrictive measures.

However, in a few cases, the decision to classify information as disinformation can be debatable, especially since we know the developments that took place after the end of the state of emergency. For example, an article published on April 25, 2020, promoted the idea that the fines were illegally imposed and encouraged citizens to circulate without declaring their responsibility necessary for leaving their homes because if they were fined, they would win the case in court. Another article instigated citizens against isolation, a violation of human rights, and would cause severe depression in the population. Aside from instigating noncompliance, these articles did not contain false information. For example, the Constitutional Court invalidated the fines for not filling out the declaration through Decision No. 152 on May 6, 2020 (Ștefan & Grama, 2020), and citizens received the right to request a refund if they had paid fines. In this case, even though the purpose of the decision to block access to a website was to discourage citizens' noncompliance, the decision to categorize this news as false information is debatable, and illustrates that a clear definition of false information should have been included in the two Presidential Decrees that sanctioned disinformation.

5.2. Sanctioning disinformation by audio-visual media service providers

The National Audio-visual Council sanctioned audio-visual service providers for

- portraying the COVID-19 pandemic as a global criminal conspiracy,
- not making a clear distinction between facts and opinions,
- not ensuring unbiased and good faith information in relation to COVID-19,
- inducing panic among the population,
- allowing people who were not specialists to encourage population against vaccination,

- discrediting some professions such as medical staff and police officers, and
- presenting information that is not verified or validated by specialists about the origin of COVID-19 and how it spread.

Even though the broadcasting companies received sanctions and had to publicly present a message with the sanction received and the motive at a peak-viewing time, they continued not to comply with the legislation. In addition, by the time sanction was applied, disinformation might already have had an effect because there were a few days gap between the sanctions being applied and the presentation of those news subject to sanctions. Therefore, we question the effectiveness of such legislation in discouraging disinformation and reducing citizens' exposure to false information.

5.3. Effectiveness of financial support for mass-media

A study conducted by Mureșanu & Sălcudean (2022) regarding the perception of journalists on the financial allowances granted by the Government to mass media showed that these allowances impacted mass media differently. Since money was granted based on ratings, local media received tiny monthly amounts, such as EUR 100. Therefore, some media outlets criticized this measure and perceived it as a measure to subdue the press before elections (Mureșanu & Sălcudean, 2022).

6. Conclusion and discussion

The experience of Romania with sanctioning the spread of disinformation during the state of emergency showed some of the limitations of this endeavor. This legislation was in force for only two months, and had limited effects because after the state of emergency was lifted, the National Authority for Administration and Regulation of Communications revoked the decisions. Therefore, access was granted again to those websites and articles blocked initially for disinformation. However, important policy conclusions can be drawn from this experience.

Blocking access to a website, as a sanctioning measure, might not be a very efficient tool because the company can move the information to a new website or create another website containing new false information (O'Sullivan, 2022). However, some websites that spread disinformation tend to have a short existence, as the present analysis illustrated. Another recommendation based on Romanian experience is that public institutions should regularly check the information posted on websites that are sanctioned by blocking access to some articles because these websites might ignore the sanctions and continue posting false information.

Any piece of legislation attempting to prevent the spread of disinformation should contain clear guidelines on how to classify actions as disinformation and how

to act in such situations. These guidelines need to be discussed with a broad range of stakeholders in order to reach a shared understanding and acceptance and to create mechanisms that prevent the exercise of discretionary power of public authorities. In order to prevent abuses by public institutions, companies should be provided with the right to contest the decisions and bring any such abuses to administrative courts. If a decision is made to restrict freedom of speech, it should be for a limited period and should be proportional to the gravity of the situation. In addition, the restrictions should be revised at some limited periods, such as 30 days, by legitimate legislative bodies, usually the Parliament. However, any limitations on citizens' rights raise many criticisms, and should be well thought out in advance since these limitations could be more efficient.

Hungary's case illustrates that the COVID-19 pandemic was used as a window of opportunity to consolidate the government's political position (Hajnal et al., 2021) by passing legislation that allowed for stricter control of information. The limitation was perceived as being targeted to silence dissenting voices (Cox, 2020; Nemec, Drechsler, et al., 2020). At the end of March 2020, the Penal Code was modified, and dissemination of false information was punishable by up to five years in prison. Within two months, 131 criminal procedures had been launched against people accused of spreading false information (Hajnal et al., 2021), which was perceived as a measure to threaten the opposition. From this perspective, the analysis that we performed on Romania showed that the decisions were not influenced by political interests but aimed at controlling disinformation, and did not have dramatic consequences as in the case of Hungary. Actually, in Romania, during the first months of the COVID-19 pandemic, the opposition political parties put aside their animosities and voted for a prime minister against whom they had passed a vote of censure just before the pandemic outbreak. Even though the sanctions applied in Romania against disinformation were not as severe as in Hungary, civil society and international organizations still expressed concerns about how the government would use its power to regulate access to information (Nițǎ, 2019).

Since countries have different regulations on disinformation, citizens can access fake news published on websites from other countries. Afterward, they can disseminate the information in their own countries, making challenging to contain fake news. Therefore, international organizations should coordinate their actions to combat disinformation, and more robust collaboration should exist between countries and other equally important stakeholders.

Even though the National Council of Audio-visual sanctions television or radio stations that misinform the audience or do not present a balanced perspective on a subject, there is a time gap between the time when the news is aired and the time when the sanction is applied, and the audience might already form an opinion on the subject of the false news. Therefore, providing access to correct information is a means to form correct beliefs, and mass media is instrumental during crises.

The spread of false information is an important issue for public administration.

However, it is not only the responsibility of public authorities to identify and sanction disinformation; social media providers should also be permanently involved in checking the information posted online. Preventing citizens' exposure to false news is problematic because there are also psychological and procedural barriers. Psychological studies show that individuals continue to rely on fake news even after viewing explicit corrections, a phenomenon called the 'continued influence effect' (Basol et al., 2020). Furthermore, human cognition tends to display a confirmation bias, and resists modifying beliefs (Bronstein & Vinogradov, 2021). Citizens share and discuss biased headlines, without any deep reading and identifying false information (Corbu et al., 2020). In the long term, citizens' digital literacy and the eHealth literacy of all social groups in society should be increased as it will last longer (Horvat et al., 2021). It will help people to be more aware of the trustworthiness of information to which they are exposed.

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Appendix - Tables

Table 1. Synthesis of the NAARC's decisions

	Title of the website/Location of the company hosting the website	Decision	Sanction
1.	www.stiridemoment.ro (Website does not exist in March 2023) No information about the location of the company that hosted the website is provided in the NAARC's decision.	Decision No. 431/20.03.2020 to block users' access to five articles that contained false information or were written to create panic. For example, one article titled 'Kaufland, Auchan, Metro, Carrefour, and Lidl will close on Monday' published on March 15, 2020, contained information that was denied by the representatives of the companies in question through the press release published on March 18, 2020 by the Association of Large Retail Chains from Romania. Another article titled 'Government secretly prepares a mega-operation to bring into the country some Romanians from several countries' contained incorrect information that had no connection with the decisions of the Romanian institutions. In the other three articles, declarations of politicians and doctors were presented truncated and in such a way as to create panic ('Doctor from Bucharest from Emergency Intensive Unit: You do not know what happens in hospitals! First of all, there are no tests! We do not test, we do not report' published on March 17, 2020).	Block access to five articles (from March 17-18, 2020) At the time of checking the website, it was no longer active. Thus, the measure of elimination at the source of several articles containing false information was no longer relevant.
2.	www.bpnew.ro (Website does not exist in March 2023) Location: Sighetu Marmației, Romania	Decision No. 453/26.03.2020 to block access to the article titled 'Coronavirus, killed by Polidin!'. The medicine Polidin, which was produced in Romania until 2010, is no longer produced.	Block access to one article. The company that hosted the website was informed that noncompliance would be sanctioned with a fine between 1,000 to 7,000 RON (between approximately EUR 200 and EUR 14,000).
3.	www.breakingnews.xyz (Website does not exist in March 2023) Location: San Francisco, USA	Decision No. 454/26.03.2020 to immediately block access to the website because it disseminated fake news that aims to produce panic and disinformation. Examples of such fake news are: '24 hours to leave the capital: Citizens who do not have a residence visa in the capital will be sent home to quarantine' (published on 18.03.2020), 'Video! A courier infected with COVID-19 spat in the pizza and then delivered it to the customer. Now he risks hard years behind bars...' (published on 18.03.2020), 'Italy has started the human experiment, 50% of the population will be affected by COVID-19' (published on 17.03.2020)	Since the website was hosted by a company located outside the country, NAAC decided that the providers of electronic communication networks immediately block the access of Romanian users to the content of the website. Noncompliance would be sanctioned with a fine between 1,000 to 70,000 RON (between approximately EUR 200 and EUR 14,000).
4.	www.cohortaurbana.ro	Decision No. 482/7.04.2020 to block users' access to the website because it constantly	The company hosting the website is obliged to

	(Website does not exist in March 2023) Location: Sfântu Gheorghe, Romania	distributes false and alarmist information about the new Coronavirus and promotes conspiracy theories such as the virus was created in a laboratory to be used as a biological weapon, respectively that this virus is a biological weapon directed against China and Iran, but which backfires against its creators, as it results from the article titled 'Russia is worried about the proximity of American biological laboratories near its borders' (published 30.03.2020), 'SARS, Bioterrorism and mass-media' (published 28.03.2020), 'Who is behind the COVID-19 pandemic chickens (chickens come home for the roast' (published 28.03.2020).	immediately interrupt transmission of the information to the users via an electronic communication network or the storage of the content available through the website. Noncompliance would be sanctioned with a fine between 1,000 to 70,000 RON (between approximately EUR 200 and EUR 14,000).
5.	www.blacktopics.wordpress.com (Website does not exist in March 2023) Location: USA (no information about the city)	Decision No. 485/10.04.2020 to immediately block access to the website because it publishes false and alarmist information about COVID-19, and the author/authors concentrate the information they publish, constantly and periodically, to induce panic and misinform the public. Examples of articles' titles are: 'Brochure – 3 – 4 – Coronavirus is the scapegoat for the radiation of 5G antennas', 'Interview that deserves to be read! COVID, manipulation, genocide, 5G, new global order, and others'.	The providers of electronic communication networks have the obligation to immediately block the access of users from Romania to the content of the site. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).
6.	www.r.news-romania24h.xyz (Website does not exist in March 2023) www.new-romania24h.xyz (Website does not exist in March 2023) These websites were hosted by servers outside Romania (without any other information about location).	Decision No. 495/14.04.2020 to immediately block access to the websites because the materials hosted on these platforms are completely false and they distort information and have the potential to create panic among Romanian citizens currently in other European states, and potentially create a massive influx at the border that could lead to pressure on certain systems of the Romanian state – medical, social, public order, etc. Examples of titles: 'Official: Italy, Germany and France permanently close their borders for two years!', 'Russia comes to help Romania! The Russian army will fight the coronavirus in Romania!'.	The providers of electronic communication networks intended for the public have the obligation to immediately block the access of users from Romania to the content of the two websites. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).
7.	www.genocid.ro (Website exists in March 2023) Location: Bucharest, Romania	Decision No. 498/16.04.2020 to block access to the website because it constantly disseminates information completely false or distorted regarding the evolution of COVID-19 and the protection and prevention measures. It contains conspiracy theories and instigates people against several public institutions from Romania. An example of a title is 'We are stopping the genocide of the Romanian people, a so-called public disinfection is being done with irritating and toxic substances'.	The company hosting the website is obliged to immediately interrupt transmission of information to the users via an electronic communication network or the storage of the content, by eliminating it at the source, available through this website. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).

8.	https://bpnew.ro (Website does not exist in March 2023) Location: Sighetu Marmației, Romania	Decision No. 499/16.04.2020 to block access to the website because the authors who publish on this website persist in launching conspiracy theories that instigate citizens to disobey the provisions of Military Ordinances regarding social distancing. For example, the article 'Vaccination – a mass experiment' stated that the current epidemic is an invention of the Big Pharma industry, and incites citizens to revolt and protest with pitchforks and axes.	The company that owns the website is obliged to immediately interrupt transmission of information to the users via an electronic communication network or the storage of the content, by eliminating it at the source, available through this website. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).
9.	https://veghepatrei.wordpress.com (Website does not exist in March 2023) Location: USA (no information about the city) https://vremuriturburi.com (Website does not exist in March 2023) Location: USA (no information about the city)	Decision No. 500/16.04.2020 to immediately block access to the websites because the materials hosted are completely false or distorted information and have the potential to create panic among citizens. The article titled 'The Grand Plan behind the COVID-19 Project' presents the main goals behind the induced pandemic, namely population reduction and crowd control by establishing a way of life without rights and freedoms, controlled by a single global government designed to exclude Russia and China from the geopolitical foreground.	The providers of electronic communication networks intended for the public have the obligation to immediately block the access of users from Romania to the content of the two websites. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).
10.	http://romania-veche.ro (Website does not exist in March 2023) Location: Bistrița, Romania www.justitiarul.ro (Website exists in March 2023, but the most recent articles are from June 2021) Location: Bistrița, Romania	Decision No. 506/23.04.2020 to block access to the website www.romania-veche.ro because the articles published were not supported by scientific evidence or relevant sources, and the pandemic was portrayed as a conspiracy that attempts to introduce CHIPs into the human body through vaccination ('Attention: Trick & Deception or 5G Antennas & COVID-19???'). The materials available on the website www.justitiarul.ro present obviously false information regarding the fact that the SARS-COV-2 pandemic was created artificially in a laboratory. In some cases, the materials presented conspiracy theories.	The company that owns the websites is obliged to immediately interrupt transmission of information to the users via an electronic communication network or the storage of the content, by eliminating it at the source, available through these websites. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).
11.	https://ortodoxinfo.ro (Website exists in March 2023) Location: San Francisco, USA	Decision No. 508/24.04.2020 to immediately block access to the website because it presents false information that has the potential to create unjustified social behavior and panic among citizens. The decision makes reference to articles titled 'The killing of pensioners in concentration camps is being prepared' (21.04.2020), 'Storing the information under the skin, like an internal tattoo, through nanocrystals inserted together with a vaccine can be done right now!', 'Corona crisis – the slide to global digital identity, chips, digital tattoos, and total control'. The information presented in	The providers of electronic communication networks intended for the public have the obligation to immediately block the access of users from Romania to the content of the website. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between

		these articles is able to generate insecurity among the public and mistrust in public institutions.	approximately EUR 2,000 and EUR 14,000).
12.	www.justitiarul.ro (Website exists in March 2023, but the most recent articles are from June 2021) Location: Bistrița, Romania	Decision No. 511/29.04.2020 revised the previous Decision No. 506/23.04.2020 to block access to the website. The company that hosted the website contested Decision No. 506, and the NAARC decided to permit access to the website, but block access to two articles. The motivation was that the purpose is not to censor publications but to prevent disinformation campaigns.	Block access to two articles. Noncompliance would be sanctioned with a fine between 10,000 to 7,000 RON (between approximately EUR 2,000 and EUR 14,000).
13.	www.justitiarul.ro (Website exists in March 2023, but the most recent articles are from June 2021) Location: Bistrița, Romania	Decision No. 517/30.04.2020 to block access to the website because it continued to post false information that has the potential to manipulate public opinion and even continued to post materials that attracted the initial closure of the website.	The company that owns the websites is obliged to immediately interrupt transmission of information to the users via an electronic communication network or the storage of the content, by eliminating it at the source, available through this website. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).
14.	https://ortodox.info.ro (Website does not exist in March 2023) Location: San Francisco, USA	Decision No. 519/5.05.2020 to immediately block access to the website because it continues the disinformation campaign regarding the evolution of the new type of coronavirus started through the old website https://ortodoxinfo.ro that was blocked through Decision No. 508/24.04.2020. The new website posted articles that were initially published on the old website. Examples of titles: 'Do not be afraid of FINES, they are illegal. They are only for intimidation. After the emergency situation ends, they will be canceled, 'Europe revolts against home arrest. The effects of forced isolation are catastrophic for the population and the economy'.	The providers of electronic communication networks intended for the public have the obligation to immediately block the access of users from Romania to the content of the website. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).
15.	https://danielvia.wordpress.com (Website does not exist in March 2023) Location: USA (no information about the city)	Decision No. 523/6.05.2020 to immediately block access to the website because it constantly posted false information that has the potential to manipulate public opinion. One article titled 'Do not vaccinate yourself in any way! Since 2005, they prepared a vaccine caused by a respiratory virus, which (they say) will inhibit the gene responsible for belief in God' has the potential to dimmish trust in public institutions or in medical staff.	The providers of electronic communication networks intended for the public have the obligation to immediately block the access of users from Romania to the content of the website. Noncompliance would be sanctioned with a fine between 10,000 to 70,000 RON (between approximately EUR 2,000 and EUR 14,000).

Source: author's own, 2023