

Policy Brief for EEAS: The case for a plug-and-play end-user FIMI flagging tool

Why This Matters

FIMI gets supercharged by generative AI (GAI). Unlike social media platforms, GAIs are: personalised — only the targeted citizen sees it; ephemeral — disappearing before oversight systems can capture it; high-volume — overwhelming platform moderation; truth-agnostic — fabricating persuasive content instantly. This places GAI-driven FIMI outside the visibility of fact-checkers, researchers, platforms, and national authorities. Only the user can detect it; only the user can flag it.

EEAS and the structural gap

The Democracy Shield relies on a network of actors that, in turn, depends on visibility of content. In a world of personalised AI content, visibility collapses. This creates a strategic blind spot: EEAS cannot respond to threats it cannot see.

The strategic opportunity: An EEAS-anchored plug-and-play flagging tool

To close this visibility gap, the EU should develop a simple, universal, plug-and-play flagging tool enabling citizens to report suspected AI-generated FIMI instantly. The EEAS is uniquely positioned to anchor the tool's analytical backend, triage system, and external-action dimension.

Training and flagging

The Democracy Shield emphasises societal resilience and whole-of-society preparedness. But resilience requires *agency*. And agency requires *tools*. Step one: a public training initiative to teach citizens to identify: personalised targeting signals; ephemeral synthetic messages; high-volume AI message bursts; content lacking identifiable provenance. Step two: a plug-and-play tool giving citizens a direct, low-friction pathway to alert the EEAS-led FIMI ecosystem. Together, training and tooling expand EEAS's early-warning visibility inside the fragmented, personalised AI-generated information spaces.

Nature of the tool

The tool should be open source and non-branded so that NGOs and other CSOs are enabled to co-develop, maintain, and distribute it frictionlessly. In the HORIZON-funded SAUFEX project a first prototype is being constructed: <https://getresilience.eu/>.

Recommendation

Although generative artificial intelligence platforms (GAIs) are not yet designated as VLOPs under the DSA, it is strategically prudent to anticipate their eventual inclusion. Investing now in a plug-and-play end-user FIMI flagging tool — complemented by citizen FIMI detection training — constitutes a forward-looking governance measure. This approach strengthens preparedness, mitigates future implementation delays, and contributes to a more stable, resilient, and adaptive regulatory ecosystem as technological capabilities continue to evolve. And, as an important side effect, the tool can already be implemented by end-users in current VLOP settings.