CEE Digital Democracy Watch

Overseeing the New Digital Era in Election Integrity

Warsaw, 6.05.2026

Public Comment — 2026-029-FB-UA
AI-Generated Video of Hungarian Politician Posted Before Election
Submitted by: CEE Digital Democracy Watch

This comment is submitted in response to Case 2026-029-FB-UA, in which the Oversight Board examines an apparently AI-generated video depicting Hungarian politician Péter Magyar, posted on a Facebook page focused on political issues and viewed more than 100,000 times prior to the 12 April 2026 parliamentary elections. Meta concluded that the content did not violate its Misinformation Community Standard and did not require an AI label, in part because it was posted "well in advance" of the elections and "seems intended for comedic effect".

The case raises fundamental questions about the governance of AI-generated political content in an electoral context already characterised by high levels of disinformation, coordinated inauthentic behaviour and the widespread use of synthetic media by both domestic and foreign actors. It also touches on the emerging obligations under the EU Artificial Intelligence Act and the Digital Services Act, particularly around transparency, labelling of deepfakes and the mitigation of systemic risks to electoral integrity.

Our comment focuses on four points:

1. The absence of clear labelling of AI-generated political content as a form of epistemic manipulation.
2. The specific sensitivity of the electoral period in Hungary and the inadequacy of a narrow temporal framing.
3. The role AI-generated content, coordinated inauthentic behaviour and hostile foreign influence played in the 2026 Hungarian elections.
4. The shortcomings of Meta's response to these campaigns and the need for stronger, election-sensitive safeguards.

We conclude with concrete recommendations for Meta's platforms and remain available to provide more extensive evidence on points 3 and 4.

1. Epistemic manipulation and deepfake transparency duties

The content at issue is an AI-generated video that closely resembles a real politician and presents itself as revealing the "real" reason for a previous televised outburst. Under the EU AI Act, this falls within the notion of a "deepfake": AI-generated or manipulated audio-visual content that appreciably resembles real persons and that a reasonable viewer could mistake for authentic.

AI-generated impersonations of political candidates raise particular risks that go beyond ordinary satire. Deepfakes can fabricate not only words but also tone, facial expressions and emotional cues, constructing caricatures that shape voters' intuitive judgments of competence, temperament and trustworthiness. Platforms should therefore apply heightened scrutiny and safeguards to AI-generated impersonations of active candidates, especially during electoral cycles, consistent with the AI Act's treatment of deepfakes and the DSA's focus on systemic risks to civic discourse.

Article 50 AI Act introduces horizontal transparency obligations for such content, requiring that deepfakes be clearly and accessibly labelled as artificially generated or manipulated, and that generative output be technically marked as synthetic. These obligations aim precisely to reduce deception and manipulation in public discourse, including around elections.

Failure to label a realistic AI impersonation of a politician contributes to epistemic manipulation: the systematic distortion of the conditions under which people form beliefs about political reality. Research indicates that vivid synthetic political videos can exert lasting influence on perceptions even when viewers are generally aware that deepfakes exist. In an electoral context, this can undermine voters' ability to make informed choices.

Article 5 AI Act further prohibits AI systems that use manipulative or deceptive techniques in ways that appreciably impair people's capacity to make informed decisions and cause or risk significant harm, a category which EU guidance already connects to certain electoral uses of deepfakes and targeted influence techniques. While the Board does not enforce the AI Act, Meta operates in this regulatory environment and should align its practices with the Act's transparency and anti-manipulation logic.

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2. Electoral period sensitivity and the "six months" argument

Meta's position that the video "would not have merited an informative AI label" because it was posted "well in advance" of the April 2026 elections reflects an unduly narrow understanding of electoral risk windows. The Hungarian campaign was long, highly polarised and saturated with synthetic content, with observers describing it as a "post-reality campaign" built on manipulative techniques and coordinated amplification.

Analyses show that AI-generated videos and deepfakes were widely used in Hungary months before election day by both government-aligned actors and parts of the opposition, often reaching very large audiences. The European Parliament explicitly warned, prior to the vote, of the "increasing use of unlabeled AI-generated political content in Hungary … notably the posting of deepfake videos".

In such conditions, a five- to six-month gap does not place content outside an effective campaign period. Pages focused on political issues with substantial reach can shape public perceptions cumulatively over months, especially when repeatedly using AI-generated impersonations and ridicule of central figures. Risk assessments in such contexts must cover the entire campaign cycle, not just the final days of voting.

3. AI-generated content, CIB and hostile influence in Hungary

The 2026 Hungarian elections illustrate how AI-generated content and coordinated inauthentic behaviour can jointly distort public debate.

Monitoring by Political Capital and others shows that Fidesz and affiliated proxy organisations made intensive use of AI-generated political videos, particularly emotionally charged "war" clips and deepfakes, while the Democratic Coalition also used synthetic media in targeted campaigns. AI videos helped actors circumvent Meta's political ads ban by running paid content through seemingly independent pages.

The Facebook page *Not our war* (*Nem a mi háborúnk*) offers a concrete example: it published AI-generated war videos depicting dead soldiers and grieving families, promoted through more than 130 ads and viewed around 800,000 times, many micro-targeted at voters in the district of then-Justice Minister Bence Tuzson. The visual and narrative style of these videos mirrored official Fidesz materials and youth campaigns.

At the same time, Hungary emerged as an EU deepfake hotspot, with multiple AI-generated videos attacking Péter Magyar, other Tisza politicians and foreign leaders, often without clear labelling. These were amplified by networks of AI-generated or

otherwise inauthentic accounts, including a documented cluster of around 100 AI personas linked to a pro-Fidesz group that engaged in coordinated commenting and sharing. Russian-linked disinformation operations, such as the Matryoshka bot network, further targeted opposition figures with smear narratives.

In this environment, the challenged video is a part of a broader pattern in which synthetic media is used to manipulate political narratives, undermine institutional trust and promote anti-Ukrainian and other polarising messages, often in ways that align with hostile autocracies' strategic interests.

4. Meta's response and cooperation in a high-risk context

Under the Digital Services Act, very large platforms must identify, assess and mitigate systemic risks to civic discourse and electoral processes, including those stemming from AI-generated disinformation and coordinated inauthentic behaviour. The Hungarian case suggests that Meta's practical enforcement could be improved in that regard. It is vital that active cooperation and scrupulous scrutiny through mechanisms such as the Rapid Response System under the EU Code of Practice on Disinformation operate throughout the entire campaign period, not only in the final weeks before election day.

Meta's political ad ban pushed much campaigning "underground", with proxy pages and AI videos effectively bypassing enforcement. Analyses after the election highlight systemic problems: misclassification of AI-generated political content, inconsistent review, weak labelling and insufficient disruption of CIB networks using synthetic media.

In the specific case before the Board, 209 users reported the video, but only one report was escalated to review; the final decision was automated, with no contemporaneous fact-checker involvement. This points to weaknesses in Meta's triage and escalation systems for AI-generated political content in high-risk electoral settings.

At EU level, the Commission has made clear that platforms must not allow elections to be determined by opaque algorithmic choices and manipulative AI campaigns, and that DSA and AI Act enforcement will increasingly target deepfakes and AI-generated disinformation. Stronger, more structured cooperation and data-sharing between Meta, EU bodies, national regulators and civil society is required to translate this principle into practice.

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Recommendations

CEE Digital Democracy Watch recommends that the Oversight Board consider the following recommendations to Meta:

1. **Prioritise network-level threats over isolated content**
   Meta should treat coordinated networks and campaigns as the primary risk vector, not just individual posts. Enforcement should focus on identifying and dismantling infrastructures that can publish or boost thousands of nominally "compliant" AI-generated political videos, pages and accounts at scale.
2. **Ensure adequate local- and minority-language human moderation**
   Meta should maintain well-resourced human moderation teams with strong local-language and minority-language expertise, rather than relying predominantly on automation or generic outsourcing, so that AI-generated narratives, coded references and context-dependent harms in countries like Hungary are correctly recognised and addressed.
3. **Create an AI-Act-aligned high-risk category for AI political impersonations**
   Meta should explicitly classify realistic AI-generated or manipulated depictions of political candidates and office-holders as a high-risk category and align their treatment with the AI Act's transparency and anti-manipulation framework, including clear AI-generated labels and robust technical marking (e.g. watermarking, metadata), especially during elections.
4. **Introduce election-sensitive escalation for AI-generated political content**
   Reports concerning AI-generated content about political candidates or key electoral issues should go to priority, human-led review with fact-checking and election-monitoring partners where needed, rather than being decided solely by automated systems in high-risk electoral contexts.
5. **Enhance cooperation and transparency with EU and national bodies**
   Meta should deepen structured cooperation with EU institutions, national regulators and observatories in high-risk electoral environments such as Hungary, including data-sharing on AI-generated political content and coordinated inauthentic behaviour, using mechanisms like the Code of Practice on Disinformation and its Rapid Response System, supported by regular, disaggregated transparency reporting.commission.

Further cooperation

CEE Digital Democracy Watch remains available to provide:

- Detailed examples of AI-generated campaigns and CIB operations observed during the Hungarian elections, including networks of AI-generated personas and foreign-linked disinformation clusters.
- Practical recommendations for operationalising AI-labelling, risk assessment and escalation pathways for AI-generated political content in line with EU law and emerging best practice.

We would welcome the opportunity to support the Board and Meta in strengthening safeguards for electoral integrity in the age of generative AI.

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