

大会論文集

Conference proceedings



国際開発学会・人間の安全保障学会 2024 共催大会

JAHSS & JASID Joint International Conference 2024

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場所：法政大学市ヶ谷キャンパス・JICA 緒方貞子平和開発研究所

Date: November 9 and November 10, 2024

Location: JICA Ogata Sadako Research Institute for Peace and Development (JICA-ORI), Hosei University Ichigaya Campus



JAPAN ASSOCIATION FOR HUMAN SECURITY STUDIES
人間の安全保障学会



国際開発学会
The Japan Society for International Development (JASID)



HOSEI University

ご挨拶

2024年の国際開発学会（JASID）の第35回全国大会と人間の安全保障学会（JAHSS）の第14回年次大会は、5年ぶりの合同開催です。今年の共催大会は、11月9日（土）～10日（日）に、法政大学市ヶ谷キャンパス及びJICA 緒方貞子平和開発研究所で開催します。

2024年は能登半島地震で幕を開けました。気候変動の影響は留まるところを知らず、感染症のリスクもなくなったわけではありません。国内外を問わず、強制避難民は1億人を突破しました。暴力が蔓延して世界の政治的な緊張は高まっています。日本の国際協力が70周年を迎えた今年、私たちの安全は脅かされ、持続的な開発目標（SDGs）の達成が危惧されています。

世界の不安定化は私たちの命、暮らし、尊厳に影響し、より一層脆弱な状況の中で取り残される人々を生み出します。それでは、誰一人取り残さず、一人ひとりの尊厳をしっかりと守る社会はどのように実現できるのでしょうか。この取り組みを強化するために、国際協力はどのような役割を果たしうるのでしょうか。今年の共催大会は、平和と繁栄に貢献することを目指す開発と、持続可能な開発の阻害要因を考察して一人ひとりの安全を守ろうとする人間の安全保障の接点となり、理論と実践の両面から活発な議論を喚起する貴重な機会です。

本共催大会では、一般口頭発表81件（オンライン3件含む）、企画セッション6件、ラウンドテーブル13件、ポスター発表31件の、合計131件が採択されました。両学会の合同セッションもあります。参加者の皆様の学会を越えた活発な交流にも期待しています。プレナリーセッションでは、不確実な時代において、国際協力や人間の安全保障の実践はいかに平和と繁栄の持続に貢献しうるのか、地球を俯瞰する視野から問題提起を行い、現代の世界を理解するための新たな視点を議論します。

皆様方の積極的なご参加を実行委員会一同、心からお待ちしております。

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Message from Conference Organizing Committee

The 35th Annual Conference of the Japan Society for International Development (JASID) and the 14th Annual Conference of the Japan Association for Human Security Studies (JAHSS) will be co-organized for the first time in five years. The co-organized conference will be held at the Japan International Cooperation Agency Ogata Sadako Research Institute for Peace and Development and Hosei University Ichigaya-Campus.

The beginning of this year saw the Noto Peninsula Earthquake. The effects of climate change are felt in every corner of the world, and the risk of the recurrence of a pandemic remains. The number of forcibly displaced persons has exceeded 100 million globally. Lingering violence increases political tensions in the world. In this year, 2024, while we commemorate the 70th anniversary of Japan's international cooperation, these challenges continue to threaten our security and raise concerns about achieving Sustainable Development Goals (SDGs).

Global uncertainty affects our lives, livelihoods, and dignity, and intensifies vulnerability of people who are left behind. How can we achieve a society where no one is left behind and the dignity of each individual is firmly protected? What role can international cooperation play in strengthening this effort? This year's joint conference serves as a valuable opportunity to stimulate lively discussions in both theoretical and practical perspectives at the intersection of development, which aims to contribute to peace and prosperity, and human security, which seeks to protect the security of each individual by addressing the factors that hinder sustainable development.

A total of 131 excellent presentations were accepted for this co-organized conference, including 81 oral presentations (including 3 online), 6 planned sessions, 13 round tables, and 31 poster presentations. There will be joint sessions of both members, and the conference organizing committee welcomes active interactions among participants from across the society and association. The plenary session will promote discussions from a global, broader and new perspectives on how the theory, concept and practice of international cooperation and human security can contribute to sustaining peace and prosperity in an uncertain era.

The conference organizing committee sincerely looks forward to your active participation.

Conference Co-Organizing Committee

[JAHSS]

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Taichi Uchio, Chief of Secretariat of JAHSS, Shizuoka University of Art and Culture

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目次

contents

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(Note: This conference proceedings reflects submissions as of the October 20 deadline, with partial updates made on November 8.)

2024年11月9日(土)(Sat. Nov 9, 2024)

- ポスター発表(Poster Presentation) 10
- 企画セッション(Special Session) 41
- ラウンドテーブル(Round Table) 128
- プレナリー(Plenary Session) 142

2024年11月10日(日)(Sun. Nov 10, 2024)

- 一般口頭発表(Oral Presentation) 155
- 企画セッション(Special Session) 952
- ラウンドテーブル(Roundtable) 992
- ブックトーク(Book Talk) 1004

Combating Digital Chaos: A Comparative Analysis of Government Responses to Information Disorder in Hong Kong and Japan

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1. Introduction

The digital age, driven by the transformative power of Information and Communication Technologies (ICT), has not only redefined how we connect, share information, and consume media but also fostered unprecedented global connectivity. Social media platforms, messaging apps, and online forums, all products of ICT, have become indispensable in our daily lives. However, this interconnectedness has also given rise to new challenges that threaten the fabric of our modern society.

A growing challenge is information disorder, which has risen exponentially in recent years, particularly in Western democracies such as the United States, the United Kingdom, France, and Germany. Information disorder is a “digital wildfire” of false, inaccurate, non-facts based, or misleading news information. The implications of this disorder are profound. Misinformation can lead to significant public confusion and fear, spreading rapidly through social media platforms even without malicious intent (Vosoughi et al., 2018). In contrast, disinformation is intentionally crafted to mislead and manipulate public opinion, often targeting democratic processes (Bradshaw and Howard, 2018). Bradshaw and Howard (2018) note that disinformation involves using “cyber troops,” described as state-sponsored organizations tasked with the purposeful distribution of fake, misleading, fabricated, or manipulated content. Malinformation, however, exploits factual information to harm individuals or institutions, thus complicating the landscape of public discourse.

The spread of false information is not at all new. We can surely remember hoaxes about the “Y2K bug” causing computers to crash or endless chain emails about winning the lottery. However, the peculiarity of information disorder in the modern interconnected era is the speed of its impact and the exponential nature of its consequences. While misinformation and disinformation were already present online, 2016 marked the most significant global turning point, where information disorder's scale, sophistication, and impact became unmistakable (Allcott and Gentzkow, 2017; Lazer et al., 2018).

The 2016 U.S. Presidential Election is widely recognized as a watershed moment for the modern understanding of disinformation. Foreign actors, notably from Russia, were accused of deliberately spreading disinformation to influence the election outcome, using social media platforms and targeted advertising to create polarization and confusion among voters (Allcott and Gentzkow, 2017; Senate Select Committee on Intelligence, 2019). AI-powered bots and trolls spread fake news stories, including false claims about candidates and political parties, amplified by algorithms tuned to achieve “virality” (Lazer et al., 2018).

Similarly, the 2016 Brexit Referendum saw numerous disinformation campaigns across political campaigns, rallies, and social media. These campaigns often featured exaggerated or false claims about immigration, financial contributions to the EU, and the benefits or consequences of leaving the European Union (Parnell, 2023).

Information disorder is not just a problem of false or misleading information. It's a problem that's been supercharged by the rapid development of Artificial Intelligence (AI). AI has enabled the creation and spread of misleading or harmful information through deepfakes, voice cloning, and related technologies. These tools not only disrupt the integrity of information but also erode public trust in institutions, media, and even the state (Wardle and Derakhshan, 2017). The consequences are not just societal but also financial, with the rise of financial fraud and scams tied to disinformation.

More recently, the COVID-19 pandemic presents yet another notable, and perhaps more consequential, example of widespread dissemination of disinformation and misinformation—particularly about the origins of the virus, false cures, and vaccine safety—leading to a global “infodemic” that severely undermined public health efforts. AI-driven platforms and bots amplified conspiracy theories, such as linking 5G technology to the virus or promoting dangerous false treatments. Vaccine disinformation was incredibly damaging, causing widespread hesitancy and reluctance to adopt proven health measures, leading to higher infection rates and preventable deaths.

Stakeholders globally, including the private sector, civil society, and governments, have increasingly

recognized and taken action against information disorder, which threatens public trust, democratic institutions, and social cohesion. At the core of responses to information disorder lies a fundamental tension: balancing the protection of freedom of expression—often framing information disorder as a moral dilemma—against the imperative to safeguard human security, recognizing information disorder as a significant threat to societal stability.

This paper presents a comparative analysis of two critical case studies: Japan and Hong Kong. Both regions face substantial digital challenges, with information disorder posing serious economic, political, and social risks. However, their approaches diverge—Japan adopts a collaborative, education-centered model, while Hong Kong implements strict regulatory measures influenced by Beijing’s influence. These contrasting approaches provide a nuanced lens through which to examine how governance structures and cultural contexts influence the delicate equilibrium between freedom of expression and the protection of human security in Asia.

2. Literature Review

The World Economic Forum's "Global Risks Report 2013" describes the wave of false or inappropriate information around the globe as a digital wildfire (Howell, 2013). These “wildfires” are accelerated by the rapid development of information technology (such as artificial intelligence, big data, and network algorithms), which influence the thoughts and behaviors of individuals in society, invisibly shaping society’s trajectory. Coupled with the emergence of deepfake technology, the destructive power of false or inappropriate information is becoming increasingly severe, making it harder for the general public to discern the truth and accuracy of information.

The term "fake news" has been used in various media and articles over the past few years, allowing people to initially understand the phenomenon of false or inappropriate information prevalent in society and online. However, as academia and governments continue to research and discuss the term "fake news," it has been found that the term is too ambiguous, leading to a situation where there is no unified definition of "fake news" in academic and international communities. In fact, each country and region may have different interpretations based on their social, cultural, and political environments. Three Singaporean scholars (Tandoc, Zheng and Ling 2017) analyzed and studied 34 academic papers on "fake news" published between 2003 and 2017, defining it as—"misleading the public with false information through forms such as advertising, news imitation, fact fabrication, opinion manipulation, and propaganda, thereby achieving political, economic, market, or psychological satisfaction and benefits." Such ambiguity offers little value to ongoing discourses surrounding information disorder, as it can refer to anything from provably false statements to statements one disagrees with.

In response, many government research reports and policies in various countries have stopped using the term 'fake news' and have instead adopted clearer terms such as 'misinformation' and 'disinformation.' This approach is beneficial for formulating relevant policies, especially for legislative and educational purposes, allowing society and the government to have a clearer understanding of the related government policies and legislation.

Wardle and Derakhshan’s (2017) report titled *Information Disorder: Toward an Interdisciplinary Framework for Research and Policy Making* popularized the term “information disorder” to describe the situation of massive amounts of fake news in the information society. They distinguish the ambiguous term 'fake news' into 'misinformation,' 'disinformation,' and 'malinformation,' using three criteria to differentiate them: (1) the level of harm, (2) the degree of falsity, and (3) the intention," as shown in Table 1 below.

Despite Wardle and Derakhshan’s (2017) efforts to differentiate the type of information disorder, some ambiguity persists as misinformation, disinformation, and malinformation often occur simultaneously within a societal setting, creating a complex and challenging information environment. This overlap exacerbates the difficulty of discerning truth from falsehood.

The UK Brexit campaign is a prime example of how misinformation, disinformation, and malinformation can occur simultaneously. Misinformation was prevalent during the campaign. For instance, many individuals shared incorrect economic forecasts and misleading statistics about the financial benefits of leaving the European Union, believing them to be accurate and helpful for making an informed decision. Disinformation was also rampant. A notable example is the claim that the UK sent £350 million a week to the EU, which could instead be used to fund the National Health Service (NHS). This claim, although widely debunked (Hajela, 2020), was strategically used to manipulate public opinion and sway the vote in favor of leaving the EU. Malinformation, which is based on reality but used to inflict harm, was evident in the use of correct information in a damaging context. Actual data about immigration levels were presented in a way

that stoked fear and xenophobia (Gorodnichenko et al., 2018), leading to increased social division and hostility towards immigrants. This type of information, while factually accurate, was weaponized to create a negative emotional response and influence voter behavior (Tambini, 2017).

Information Disorder	Nature	False	Destructive	Intentional
Misinformation	Information shared with errors and misleading elements. Includes human errors, such as incorrect dates, data errors, etc.	Yes	Yes	No
Disinformation	Serious and intentional misinformation. Partially or completely false and misleading.	Yes	Yes	Yes
Malinformation	Accurate information used for malicious reasons, such as causing damage to individuals, groups, organizations, or countries.	No	Yes	Yes

Table 1: Wardle and Derakhshan’s (2017) classification of information disorder

In response to the security threat of "digital wildfires," governments around the world have, in recent years, adopted administrative, legislative, and educational measures tailored to their national conditions to curb false or inappropriate information, preventing it from causing more severe and irreversible damage to society (e.g. Assemblée Nationale, 2018; House of Commons of the UK, 2018; Parliament of Singapore, 2018). The European Union’s Code of Practice on Disinformation fosters collaboration between tech platforms and fact-checkers, while Germany’s NetzDG law mandates that social media companies remove illegal content, including disinformation, or face fines. France’s Anti-Manipulation Law targets false information during elections, and Singapore’s POFMA legislation empowers the government to correct harmful falsehoods. Norway has implemented a unique photo edit law, which requires advertisements featuring digitally altered body features to be labeled as such, applying to influencers and paid promotions across all platforms. In the United States, the approach has largely relied on tech companies to self-regulate, with platforms like Facebook and Twitter taking measures to flag or remove disinformation in response to increasing public and political pressure. Alongside these government actions, civil society has played a crucial role, leading fact-checking initiatives and promoting media literacy to counter misinformation.

2.1 Human Security Implications

Human security is a comprehensive framework that emphasizes the protection and empowerment of individuals rather than states, addressing a wide range of threats to human dignity and well-being (UNDP, 1994). Emerging prominently in the 1990s, particularly through the United Nations Development Programme’s (UNDP) 1994 Human Development Report, the concept arose as a response to the inadequacies of traditional state-centric security models. These earlier frameworks primarily focused on military threats and national borders, often neglecting the day-to-day insecurities faced by individuals, such as poverty, disease, environmental degradation, and violence (Alkire, 2003; Turcilo and Obrenovic, 2020). Human security shifts this focus by asserting that true security must ensure freedom from fear, freedom from want, and freedom from indignity—core components that encapsulate the multifaceted nature of human existence (Tadjbakhsh, 2005. UNDP, 1994; OECD, 2021).

At its essence, human security recognizes that individuals are often more vulnerable to threats emanating from their own governments or societal structures than from external state adversaries. This perspective challenges the dominance of "high politics" in security discourse and advocates for a more nuanced understanding of security that encompasses economic stability, social justice, and environmental sustainability (Vermeij et al., 2023). The theoretical foundation of human security suggests that effective governance is crucial for protecting individuals; however, it also acknowledges that states can be sources of

insecurity when they fail to meet their citizens' basic needs or engage in oppressive practices (Allcott and Gentzkow, 2017).

Integrating this theoretical framework into the discussion of information disorder reveals significant implications for human security. It poses profound threats to individual safety and societal stability. The rapid spread of false narratives in the digital age can destabilize communities and erode trust in institutions for governance and social cohesion. For instance, misinformation can lead to decreased trust in media outlets, particularly detrimental during crises when reliable information is crucial for public safety. This decline in trust undermines compliance with public health measures and electoral processes, ultimately jeopardizing democratic governance (UNDP, 2020).

Moreover, information disorder exacerbates social polarization by exploiting existing societal tensions. Disinformation campaigns often target vulnerable groups, intensifying divisions and inciting hostility. This manipulation can legitimize violence against marginalized communities and create an environment ripe for conflict (Vermeij et al., 2023). The strategic use of false information can also stoke fear and xenophobia, as seen during the COVID-19 pandemic when specific communities were unjustly blamed for the virus's spread (Allcott and Gentzkow, 2017).

The long-term implications of information disorder extend beyond immediate crises. It can distort electoral processes by influencing voter perceptions and behaviors, ultimately jeopardizing the integrity of democracy itself. Additionally, its campaigns targeting specific groups may violate fundamental rights such as dignity and equality, leading to discrimination fueled by false narratives portraying these groups as societal threats (Turcilo and Obrenovic, 2020).

While existing research provides valuable insights into how information disorder affects human security, few studies focus on Asia, particularly in a comparative context. Scholars have examined individual countries in isolation, but comparative studies are needed to understand how different governance models—such as Hong Kong's top-down, Beijing-influenced model and Japan's decentralized approach—shape responses to information disorder and digital crime, in particular. This paper aims to fill this gap by providing a detailed comparative analysis of Hong Kong and Japan.

3. Methodology

This study employs a comparative case study approach to analyze the responses of Hong Kong and Japan to the growing threat of information disorder. The case study method allows for an in-depth examination of each region's unique socio-political and cultural context while facilitating a comparison of their approaches to digital crime prevention. By utilizing qualitative research, this study aims to capture the complexities surrounding information disorder, providing general insights and analysis that quantitative methods may overlook.

Hong Kong and Japan were selected as case studies due to their distinct governance models and the significant financial losses they have incurred due to digital crimes. Additionally, both regions have implemented policies aimed at combating the information disorder, making them ideal for comparative analysis.

The data for this study were collected from various sources, including government policy documents, legislative texts, news articles, court cases, and academic papers. This multi-faceted approach ensures a comprehensive understanding of each government's response to information disorder.

The qualitative method is particularly beneficial for this paper because it allows for flexibility in exploring how different governance structures influence public policy and societal responses to digital crime. By triangulating data from multiple sources, the study enhances its validity and reliability while uncovering more profound insights into the effectiveness of governmental strategies in both regions.

The paper's analysis is guided by a human security framework, which emphasizes the impact of information disorder on individuals' safety, economic security, and trust in institutions.

4. Case Study 1: Hong Kong

In Hong Kong, the phenomenon of information disorder has been particularly pronounced in recent years, especially during key events such as the 2019 social unrest and the COVID-19 pandemic (Luk, 2023). The region's socio-political environment, marked by tensions between local governance and Beijing's central authority, has made it especially vulnerable to the spread of false or misleading information. These events saw the rapid proliferation of rumors and disinformation across major media and social platforms, which exacerbated social divisions and significantly impacted public security and stability.

With technological advancements, the use of tools such as big data, bots, internet trolling, and deepfakes has become increasingly common, enabling malicious actors to spread fake news to large, specific, or general audiences. This surge in disinformation has created a complex challenge for Hong Kong, as the region attempts to balance its semi-autonomous status, the influence of Beijing, and the need to protect freedom of expression while ensuring social stability.

4.1 Legislation

Currently, Hong Kong relies on a mix of legislative and common laws, including the Hong Kong National Security Law (NSL), the Crimes Ordinance, and the common law offense of Outraging Public Decency. For detail, the NSL enacted in June 2020, it addresses explicitly secession, subversion, terrorism, and collusion with foreign forces; the Crimes Ordinance includes provisions against dishonest acts and access to computers with criminal intent; and the Outraging Public Decency, which is an old common law offense that criminalizes for a person to do an act or acts which outrage public decency, and punishable under section 101I of the Caption 221 Criminal Procedure Ordinance.

However, these laws are often criticized for being outdated or insufficiently defined to effectively combat misinformation. For instance, the NSL focuses primarily on national security rather than specifically targeting fake news, while the Outraging Public Decency law requires public visibility that does not align with how information spreads online.

However, Luk and Cheung (2023) highlights several limitations of these existing laws. They argued that these laws often lack clarity regarding what constitutes fake news, making it challenging to prosecute offenders. Many criminal laws necessitate clear victims or identifiable harm caused by misinformation, which is difficult to establish in cases of information disorder or fake news. Furthermore, they reviewed recent important judicial precedents issued by the Court of Final Appeal of HKSAR that have restricted the applicability of these laws against online speech related to misinformation, leading to a socio-legal environment that fails to adequately address the unique challenges posed by digital misinformation.

The NSL, one of the most commonly misunderstood legislation by foreigners, is also ineffective and insufficient when dealing with information disorder. Firstly, it does not specifically address false information that does not threaten national security, which means it does not provide a clear legal framework for prosecuting the dissemination of false information unless it directly relates to acts defined as secession or subversion. Secondly, another significant limitation is that the application of the law is limited after the landmark case of *HKSAR v. Tong Ying Kit*, the judges emphasized that the context surrounding an act—such as the social situation and political atmosphere—was crucial in determining whether it constituted a threat to national security. This means that if an act does not have a clear connection to national security threats, and also without the relevant context surrounding the context, it may fall outside the scope of the Security Law.

Apart from the NSL, the Safeguarding National Security Ordinance, enacted on March 23, 2024, in light of Article 23 of the Hong Kong Basic Law, aims to enhance legal frameworks for safeguarding national security in Hong Kong. This legislation is part of a broader initiative to ensure compliance with enhancing national security requirements as stipulated by the Chinese Central Government. The ordinance encompasses various provisions that define offenses against national security, including treason, sedition, and collusion with foreign forces, while also outlining enforcement mechanisms and penalties for violations.

The ordinance has partial implications for countering information disorder and "fake news" in Hong Kong. It introduces provisions that criminalize the dissemination of false or misleading information that could jeopardize national security. Under this framework, individuals who knowingly publish such information may face severe penalties, which could deter the spread of misinformation. Moreover, the law's provisions against collusion with foreign forces can be utilized to target those who disseminate information perceived as harmful to national security, especially if linked to foreign influence. The criminalization of seditious intent further empowers authorities to act against fake news that undermines public trust in government institutions or incites unrest.

Additionally, the ordinance grants law enforcement agencies broad powers to investigate and act against suspected violations of national security. This includes the authority to remove or obliterate publications deemed seditious or harmful, potentially curbing the spread of false information.

Yet, like the NSL, the Safeguarding National Security Ordinance focuses on national security protection. Therefore, if an act does not clearly relate to national security threats and does not provide the relevant context, it may also fall outside the scope of this law.

Still, scholars and media argued that while both Security Laws do not explicitly target information disorder or fake news, they have, in effect, created a chilling effect that significantly regulates online activities

and speech. This chilling effect arises from the laws' broad and vague definitions of offenses related to national security, which can encompass a wide range of expressions and actions, including those that do not directly threaten public safety or national integrity. Some even argue that it has led to increased self-censorship among media outlets and online platforms. Journalists and content creators may choose to avoid discussing topics related to national security or critical perspectives on the government for fear of repercussions. This self-censorship contributes to a homogenization of discourse in Hong Kong, where diverse viewpoints are stifled under the current social context (Human Rights Watch, 2021).

Remarkably, Hong Kong recently proposed a new cybersecurity law tentatively entitled the "Protection of Critical Infrastructure (Computer System) Bill". The Bill was proposed on June 25, 2024, which is part of a global trend toward stricter cybersecurity measures and seeks to align Hong Kong with jurisdictions like Mainland China, Singapore, and the UK. One of the main limitations is that the proposed law focuses primarily on the protection of computer systems belonging to designated critical infrastructure operators and does not address the broader issue of misinformation dissemination. It does not include provisions specifically targeting the creation or spread of fake news. It emphasizes organizational and preventive measures for computer infrastructure, in lieu of establishing mechanisms for identifying or penalizing the spread of false information. In other words, Hong Kong still lacks the necessary legal framework to directly confront the challenges posed by misinformation, which has been a significant issue during events like the 2019 social unrest and the COVID-19 pandemic.

4.2 Public Education and Market-based Regulation

Recent research suggests that news literacy training could improve students' ability to assess news sources and credibility while also motivating them to report misinformation (Ku et al., 2023). For instance, following the spread of COVID-19 vaccine misinformation, public health authorities emphasized the importance of media literacy to counter vaccine hesitancy (香港浸會大學, 2021). However, there is a gap between these awareness efforts and their practical reach. Although digital literacy programs exist, their effectiveness in curbing fake news and misinformation remains uneven, particularly among younger generations (香港青年協會, 2022). This highlights the need for further investment in education initiatives to increase skepticism toward online disinformation.

As the Chief Executive of Hong Kong mentioned, he has no intention of legislating a "fake-news law" to combat information disorder, and the government currently emphasizes school education programs. The Hong Kong Education Bureau's recent updates to the Primary Education Curriculum Guide (PECG) emphasize the importance of media and information literacy as a critical component in combating information disorder and fake news. Announced on September 8, 2022, and further enriched in 2024, the PECG aims to enhance patriotic education alongside life education and national security education. This initiative aligns with the government's broader strategy to promote patriotism and national identity among students (The Government of HKSAR, 2022a).

The incorporation of media and information literacy into the curriculum is particularly significant in the context of rising misinformation and disinformation prevalent in today's digital landscape. The updated framework encourages students to develop essential skills for critically evaluating information sources, understanding the impact of sharing false information, and recognizing the ethical implications of their online behavior (Al-Zou'bi, 2021; Tettey, 2013). By fostering these competencies, the government aims to equip students with the tools necessary to navigate an increasingly complex media environment, thereby reducing their susceptibility to misinformation (Breakstone et al., 2021; Loomba et al., 2021).

However, considering the timeline, the implementation of digital and media literacy in the context of national security carries a double meaning, particularly in Hong Kong's current socio-political landscape. On one hand, enhancing digital and media literacy is essential for empowering citizens to critically evaluate information, discern credible sources, and combat misinformation. This is increasingly crucial in an era where fake news can undermine social trust and exacerbate political tensions, as evidenced during the 2019 social unrest and the COVID-19 pandemic (Luk and Cheung, 2023; Lee, 2020). The Hong Kong government recognizes this need and has incorporated media and information literacy into educational frameworks to equip students with the skills necessary to navigate the complex digital information environment.

Controversially, some argue that the push for increased digital literacy is intertwined with national security objectives. The government's emphasis on patriotic education and national security education reflects a broader strategy to foster a sense of national identity while simultaneously addressing the threats posed by misinformation (Kihara, 2021; The Government of HKSAR, 2022b). By promoting media literacy alongside national security education, the government aims to cultivate a populace that not only understands

the importance of accurate information but also aligns with authorities' narratives and values. This dual approach can be seen as reinforcing social cohesion and stability in a politically charged environment.

However, this intertwining of digital literacy with national security might raise concerns about potential overreach. Critics argue that while promoting media literacy is vital for combating misinformation, it may also serve as a mechanism for the government to have a bigger influence to shape narratives under the guise of safeguarding national security (Lim and Bradshaw, 2022). The fear is that initiatives aimed at enhancing digital literacy could inadvertently lead to restrictions on freedom of expression, as individuals may become wary of sharing information that could be deemed politically sensitive or contrary to authority interests (Wardle and Derakhshan, 2017).

In summary, while digital and media literacy is crucial for empowering citizens against misinformation, its promotion within a national security framework in Hong Kong carries a double-edged sword. It highlights the need for a balanced approach that fosters critical thinking and information discernment while safeguarding civil liberties. As Hong Kong navigates these complex dynamics, it is essential to maintain a dialogue that prioritizes both public safety and individual freedoms in the face of evolving challenges posed by misinformation.

Apart from public education, the private sector also promoted public awareness in fighting information disorder. Tech companies, news media and social media platforms have also played a role in combating disinformation in Hong Kong, although government regulation has largely shaped their efforts. At the same time, corporations and tech companies are motivated by their profit interests, which often clash with the government's drive for control. The tension between allowing open communication and following government orders has created a complicated relationship between private companies and state actors in the digital landscape.

5. Case Study 2: Japan

Japan's experience with information disorder differs somewhat from that of Hong Kong's, highlighting a preference for decentralized governance and a collaborative approach to addressing societal challenges. Unlike Hong Kong's more security-focused and heavy-handed approach, Japan has historically leaned towards stakeholder involvement and voluntary compliance. However, like much of the world, Japan has faced growing concerns about the spread of misinformation and disinformation, particularly during the COVID-19 pandemic and following the rise of digital crime. The government's response to information disorder has been less about strict regulation and more about fostering collaboration between government agencies, private companies, and civil society to address the challenges of the digital age.

Japan's approach is shaped by its cultural emphasis on social harmony and collective responsibility, which affects how disinformation is treated. Public awareness and digital literacy initiatives have played a significant role in mitigating the risks posed by false information, while enforcement tends to rely on public-private partnerships rather than top-down regulations.

5.1 Legislation

Unlike Hong Kong legal system which follows the common law system, Japan legal system is a civil law system adhered from Germany. Japan's approach to information disorder is shaped by its reliance on existing laws rather than dedicated legislation for combating misinformation or disinformation. Laws such as the Act on the Protection of Personal Information (APPI), the Penal Code, and the Broadcasting Act regulate various aspects of the information landscape. The APPI focuses on the protection of personal data, while the Penal Code addresses crimes like fraud and obstruction of business, which can stem from the dissemination of false information. The Broadcasting Act ensures the factual integrity of broadcast content but does not extend to the regulation of misinformation across social media platforms or the broader digital sphere. Additionally, The Act on the Limitation of Liability for Damages of Specified Telecommunications Service Providers helps facilitate the disclosure of identification information from content distributors in cases of defamation or slander, but it lacks the scope needed to tackle misinformation or disinformation directly.

In 2020, Japan introduced a Digital Agency as part of broader government reform, aimed at improving the country's cybersecurity infrastructure and overseeing digital transformation efforts. However, the government has largely avoided imposing direct restrictions on freedom of expression online, reflecting its emphasis on civil liberties. This has led to a more hands-off approach in regulating misinformation, with the focus placed on collaboration and self-regulation.

Like Hong Kong, Japan's lack of dedicated laws governing its handling of information disorder serves as a key legal handicap, which undermines efforts at combating digital chaos. Even in cases where arrests are made for what appear to be information disorder crimes, deeper scrutiny proves otherwise. A case that highlights this is the 2016 Kumamoto Earthquake hoax, where a man falsely claimed in a Twitter post that a lion had escaped from a local zoo as a result of the earthquake. The zoo received a barrage of phone calls, overwhelming staff and obstructing its operations, leading to the man's arrest. However, the man was not arrested for the misinformation itself, but rather for fraudulent obstruction of business (Japan Today, 2016). Similarly, after the 2024 Noto Peninsula earthquake, a man posted fake rescue requests on social media, prompting a police search for nonexistent victims (The Yomiuri Shimbun, 2024). Again, the man was arrested for obstructing rescue operations, not for spreading false information.

These cases illustrate a significant gap in Japan's legal framework owing to a lack of laws that directly address the dissemination of false or misleading information, even when it causes widespread confusion or panic. Instead, existing laws such as the Penal Code focus on the consequences of such actions, like fraud or obstruction of business. This limitation suggests that while Japan's legal system can respond to the side effects of information disorder, it lacks the tools to combat information disorder itself. Public opinion on the Kumamoto arrest also reflects this lack of clarity. While many netizens suggested that the arrested man was deserving of his punishment, many others lambasted the legal system for wasting public resources and inadvertently criminalizing lying. As one comment suggested, the man's false post was tasteless and inconsiderate, but hardly criminal and such arrests represent an arbitrary and inefficient use of police time and resources (Japan Today, 2016).

Thus, with such legal ambiguity surrounding acts of information disorder, criminal enforcement shifts towards crimes of deceit, such as cyber fraud, which though increasingly exacerbated by the use of sophisticated techniques like deepfakes and voice augmentation, are distinct from the broader phenomenon of information disorder. Japan has seen a significant rise in such crimes, particularly in the form of impersonation scams like the *ore ore* (It's me) scams, where fraudsters deceive victims—often the elderly—into sending money by impersonating family members. In 2022 alone, over 14,000 cases of these scams were reported, resulting in hundreds of arrests. Law enforcement agencies have noted the increasing use of voice-changing software in these scams, making it harder for victims to recognize that the calls are fraudulent. These rising numbers reflect the growing challenge that the spread of false information poses in Japan, especially when it is used to facilitate criminal activities.

The rise of foreign-based *ore ore* scams targeting Japanese citizens has also become a notable issue. The Ministry of Foreign Affairs report has highlighted cases of Japanese citizens abroad being targeted in scams where individuals pose as family members needing urgent financial help. These cases underscore the need for responses that can adapt to the increasingly transnational nature of information disorder.

Political misinformation is another growing concern in Japan. As Owen et al. (2018) point out, the internet was banned as a platform for political campaigning in Japan until 2013. This confined political campaigning to traditional media outlets like television, which the Broadcast Act strictly regulates. Thus, Japan is viewed as comparatively more resilient to political misinformation as a function of this socio-political trait. However, Kobayashi and Ichihara 2024 call this “accidental resilience,” noting that, culturally, in addition to being more politically disengaged, the Japanese tend to shy away from expressing political views in general. This cultural trait is perhaps essential in Japan's avoidance of widespread political information chaos. However, this, too, is changing.

In light of these limitations, there has been a shift in Japan's legislative posture. The Liberal Democratic Party (LDP) has introduced a draft proposal in 2024 that aims to regulate large-scale AI developers, such as OpenAI, in response to concerns about the risks of AI-generated misinformation (Sakai et al, 2024). The proposal calls for third-party safety verifications and regular compliance reports from AI developers, aligning Japan with similar regulatory efforts in Europe and the United States. This marks a significant departure from Japan's traditional reliance on self-regulation by private companies.

In addition, an expert panel of the Internal Affairs and Communications Ministry has compiled a draft report recommending that major social media operators promptly remove illegal posts (The Yomiuri Shimbun, 2024). The panel's recommendations also call for the creation of a task force composed of platform operators and research institutions to develop guidelines for mitigating the impact of misinformation. The panel emphasized the need for transparency in how administrative bodies handle requests to remove content, cautioning against government overreach and potential censorship.

The National Police Agency, in recognizing the shift towards digital crime, is moving to close down local police boxes, who are largely seen to have outlived their purposes of suppressing street crime—such as purse snatching—which is largely non-existent in modern Japan. This reorganization aims to give more

priority and manpower to towards combatting cyber crime (Maeda, 2024).

5.2 Public Education and Market-based Regulation

Japan's approach to public awareness and the regulation of misinformation reflects a combination of self-regulation by tech companies and a focus on public education. Unlike many Western nations, Japan has fewer formal mechanisms specifically designed to combat disinformation, though it has gradually recognized the growing challenge posed by digital misinformation, particularly in the context of the COVID-19 pandemic and the rise of artificial intelligence (AI) technologies.

Public education is particularly important in Japan given the relatively vulnerability of its citizens to deception, perhaps owing to the maturity and stability of Japanese social and political system. A 2023 survey by Nanyang Technological University (NTU) and Nikkei Asia highlighted that Japan has only five active fact-checking sites, a stark contrast to the 78 fact-checking sites in the United States (Takeda et al, 2023). This deficiency is reflected in the public's ability to identify misinformation; while 75% of Japanese respondents reported encountering fake news, only 19% felt confident in their ability to fact-check such information. This suggests a significant gap in the public's ability to discern credible information, exacerbating the challenges posed by disinformation.

As in Hong Kong, Japan has begun investing resources on public education and digital literacy to combat information disorder. Campaigns led by the government, such as those around vaccine misinformation during the COVID-19 pandemic, have focused on raising public awareness about the dangers of false information. In particular, the Ministry of Internal Affairs and Communications has taken the lead in developing resources aimed at teaching citizens how to identify misinformation and encouraging responsible use of social media. Additionally, in 2017, the Ministry of Education implemented a digital literacy program across schools, teaching young students how to critically evaluate online sources and avoid falling victim to disinformation.

Civil society groups have also played roles in combatting information disorder. Public broadcaster NHK, for instance, plays a key role in combatting misinformation through its platform, which includes educational resources to help the public spot fake news. NHK's website hosts a section titled “フェイク対策～情報を見極めるために～” (“Countermeasures against fake news: How to distinguish the truth”). This section provides practical advice and examples, such as warnings about fake donation requests, bogus disaster-related information, and unverified medical claims. Articles like “Breast cancer screenings and treatment... Be cautious of uncertain information!” and “Let's fact-check together: Fresh meat is not safe to eat raw” help citizens navigate the complexities of digital misinformation. Another civil society organization involved in the fight against information disorder, is Fact-Checking Initiative Japan, which works with media outlets to verify potentially misleading information. Established in 2017 at the initiative of 10 journalists and experts, it aims to position fact-checking as an important role of journalism and create a system to prevent the spread of false information in society (Fact-Checking Initiative Japan, 2024).

Despite the efforts of government and civil society, Japan's approach continues to rely heavily on self-regulation by tech platforms. Major platforms like LINE, Twitter Japan, and Facebook Japan have been encouraged to voluntarily monitor and moderate harmful content, including misinformation, based on guidelines provided by the government. LINE, which originated in Japan and remains the country's most widely used social media platform, emphasizes maintaining public trust by monitoring and limiting harmful content. However, platforms like Facebook and Twitter have faced criticism, with internal documents leaked in 2021 highlighting their struggles to address misinformation outside the United States, particularly in Japan (Nikkei, 2021). These gaps in content moderation raise concerns about the adequacy of existing measures to combat misinformation in Japan.

While Japan remains focused on public education and voluntary regulation, there is growing recognition of the need for more robust frameworks to address the increasingly globalized nature of misinformation. Recent steps toward increased regulation and legislation reflect a recognition of the need for a shift in the government's stance on handling information disorder. Beyond domestic concerns, the Japanese government, as a member of the G7, has also begun forming alliances to tackle the issue of information disorder on a global scale. At the G7 Digital Ministers' Meeting in May 2022, a G7 Digital Ministers' Declaration was adopted, reaffirming the commitment to improving how governments and businesses handle harmful and illegal content at global, national, and regional levels. This declaration emphasizes the transparency and accountability of measures addressing disinformation while upholding human rights, particularly freedom of expression. Furthermore, the Resilient Democracies Statement, adopted by the G7 in June 2022, underscores the collective responsibility to counter information manipulation, disinformation, and

interference, recognizing their threat to democratic systems.

6. Discussion

The analysis of Hong Kong and Japan reveals two distinct approaches to managing information disorder, shaped by each region's governance models, cultural values, and socio-political contexts. This comparative work helps us better understand how each region navigates the tension between protecting free speech and addressing the security risks posed by information disorder.

One thing in common of both places is the inadequate legal framework to fight against information disorder, and they are trying to implement some legislation to fill up the gap. Yet, the responses of Hong Kong and Japan to information disorder reveal significant differences shaped by their distinct socio-cultural contexts, legislative frameworks, and public awareness strategies.

In Hong Kong, the socio-political landscape is marked by social unrest and political turmoil, particularly following the 2019 protests and the subsequent implementation of NSL, which prioritizes national security and public order. This law has been argued to lead to a chilling effect on free speech, as misinformation is treated as a potential threat to national security. Conversely, Japan's socio-cultural context is characterized by resilience in the face of natural disasters and social issues, with a focus on collaborative governance and public-private partnerships. Legislation in Hong Kong is heavily focused on national security, often at the expense of civil liberties, while Japan relies on existing laws that do not specifically address misinformation, instead emphasizing self-regulation and voluntary compliance among tech companies. Public awareness initiatives in Hong Kong are predominantly top-down, centered around public school education with limited private sector involvement, whereas Japan adopts a decentralized approach that empowers civil society organizations to promote media literacy. This divergence highlights how governance structures and cultural values influence each region's ability to navigate the complex challenges posed by information disorder, balancing the need for security with the protection of individual freedoms.

Categories	Hong Kong	Japan
Socio-cultural & political context	Social Unrests & political turmoil	Natural Disasters & social problem
Legislation & policy focus	National Security & public order	Human security & social good
Public education & awareness	Centralized, Top-down	Decentralized Bottom-up

6.1 Governance and Regulatory Approaches

Hong Kong's approach, after the scar of 2019 social unrests and COVID-19 pandemic and with the agenda of complying with Beijing's agenda, reflects a more security-first strategy. The enactment of the National Security Law and the rapid implementation of security education show a clear priority placed on political stability and national security. Hong Kong treats disinformation as a threat to national security, justifying increasing controls in the name of security. However, these efforts could come at the expense of freedom of expression, with concerns over the chilling effect of self-censorship.

In contrast, Japan's decentralized, collaborative approach reflects its commitment to balancing freedom of expression with the need to protect society from harm. By emphasizing public-private partnerships and voluntary compliance, Japan offers broad freedom of speech but relies on self-regulation and public education to mitigate the effects of disinformation. This strategy aligns with Japan's cultural values of social harmony and consensus-building, where digital literacy initiatives are seen as more effective than punitive laws.

6.2 Consequences for Harmful Speech

A key difference between the two regions lies in the consequences for harmful speech. In Hong Kong, individuals face severe legal repercussions for engaging in disinformation or any form of content that challenges state authority, with harsh penalties of imprisonment. The government's enforcement are focused on preventing social unrest and political instability.

In Japan, however, there is no specific legislation targeting disinformation in the same way. Instead, the government's focus is on fraud prevention, particularly in the context of digital crime, such as the ore ore (It's me) scam. Legal consequences in Japan tend to target financial crimes and identity theft, leaving the issue of misinformation more in the hands of private companies and civil society. This positions Japan closer to the left-hand side of the framework, where few legal consequences exist for disinformation, but digital literacy and self-regulation are emphasized.

6.3 Cultural Context and Public Response

The cultural context plays a significant role in shaping the public's response to information disorder and positions each region differently on our framework. In Hong Kong, the government's strict regulations are met with resistance, especially among younger generations and pro-democracy activists. The spread of disinformation during the 2019 social unrest exacerbated these tensions, making information control a politically charged issue. The public's distrust of government motives after the eventful year of 2019 highlights the risks of overreach in the name of security. This shows that Hong Kong maintains a high level of social control where consequences are coupled with increasingly limited freedom.

Japan's trust-based society, on the other hand, sees greater compliance with government-led initiatives. Public health campaigns during the COVID-19 pandemic benefitted from a population largely receptive to government messaging, despite early skepticism around vaccination. This reflects Japan's cultural emphasis on social responsibility and collective action with broad freedom and low legal consequences, relying on public trust and digital literacy.

6.4 Implications for Human Security

Both Hong Kong and Japan illustrate different interpretations of human security in the face of information disorder, and their positions in the framework reflect these differences. For Hong Kong, disinformation is treated as a national security threat, warranting extensive regulation in security to prevent social unrest. This approach, while effective in curbing a certain type of information disorder, raises concerns about the erosion of personal freedoms and the potential for government overreach. The focus on stability over civil liberties demonstrates the trade-offs that governments may make when prioritizing security.

In contrast, Japan's emphasis on voluntary compliance and public education suggests a more balanced approach, where freedom of expression is preserved. Still, human security is addressed through public awareness and collaboration. Japan aligns more closely with the democratic ideals of freedom and responsibility, emphasizing the role of societal actors in maintaining digital integrity without resorting to harsh legal penalties.

6.5 Broader Implications

The responses to information disorder in Hong Kong and Japan offer valuable insights for other regions grappling with the challenges of information disorder. For more control-oriented regimes, Hong Kong's model may seem appealing, as it offers a pathway to maintaining political control through strict enforcement and surveillance. However, this may come at the cost of increasing limitations on personal freedoms, raising questions about the balance between security and civil liberties. Japan's model, meanwhile, offers lessons for more liberal nations seeking to balance freedom of expression and the preservation of human and national security. By prioritizing collaborative governance and digital education, Japan shows that voluntary compliance and public trust can be practical tools in combating disinformation without infringing on freedom of speech. However, its move towards more oversight and regulation highlights the limitation of this collaborative model and an era of hyper-technological evolution.

7. Conclusion

As information disorder becomes an increasingly global issue, affecting nations across all regions, the cases of Japan and Hong Kong provide valuable insights into how societies can respond to the growing threat of misinformation and digital crime. While both regions adopt contrasting approaches—Hong Kong emphasizing strict regulation and government control and Japan relying on collaborative governance and public education—their experiences contribute to the global understanding of balancing the protection of freedom of expression with the need to safeguard human security.

It is essential to move away from viewing this issue through a simplistic linear spectrum of freedom versus control. We call for more nuanced frameworks that more accurately represent cultural context, societal norms, and governance models that shape how countries navigate the tension between treating disinformation as a moral dilemma or a human security threat. As information disorder grows more pervasive through the ubiquity of social media and globalized technology, countries must look beyond their long-held cultural cleavages and adopt broader, more flexible strategies that reflect the transnational nature of these threats.

The shared experiences of Japan and Hong Kong—from facing financial risks posed by digital scams to relying on public-private collaboration to manage online spaces—highlight the need for a more unified global response to these challenges. Their strategies, though culturally specific, offer lessons for other nations about how to approach misinformation while balancing freedom of speech and security. Furthermore, their contributions to this global issue enhance the body of literature by providing critical case studies from East Asia, a region often underrepresented in information disorder research.

However, as the threat of information disorder evolves, more research is necessary to investigate how state actors, private companies, and civil society organizations tackle these issues. Theoretical papers such as this one lay the groundwork for future research. Still, practical insights from those directly fighting information disorder—whether through content moderation, law enforcement, or public education—are essential to developing more effective solutions. Understanding how these actors perceive and handle information disorder will offer critical insights into improving policy-making and public awareness.

In light of these challenges, there is a growing need to prioritize human security, elevating the threat of information disorder to a more central position in both national and global security discussions. Citizens, particularly vulnerable populations such as the elderly, need to be better educated about the risks of disinformation and equipped with the tools to recognize and respond to it. By empowering individuals with digital literacy and expanding the scope of public awareness efforts, societies can build resilience against the harmful effects of misinformation.

In conclusion, while Japan and Hong Kong represent different approaches to handling information disorder, their experiences underscore the global nature of this challenge and the urgent need for collaborative, nuanced, and forward-thinking responses. As misinformation becomes a more potent force in shaping societies, the international community must work together, drawing on the lessons from East Asia and beyond, to ensure that freedom of expression and human security are mutually exclusive but harmoniously balanced in the digital age.

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