



51st EPRA Meeting – Plenary 2

Media plurality in the age of algorithms

Media plurality in the age of algorithms
New challenges to monitor pluralism and diversity
Background document¹
Content Producer: Lewis McQuarrie, Ofcom (UK)

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1. Introduction

This background paper sets the frame of conversation for the podcast recorded by Olaf Steenfadt, Eleonora Mazzoli and Elda Brogi on the topic of media plurality in the age of algorithms. This podcast replaces the planned panel discussion for Plenary 2 at the 51st EPRA meeting in Antwerp. Our contributors’ recorded remarks will touch on new research on technological and cultural changes emerging in this age of algorithms that are relevant to media plurality, with Elda and Olaf considering how plurality measurement frameworks can adapt to take account of these changes and continue to inform policy debates. Eleonora will focus on the new value chains for media distribution that are emerging, what their impact might be on media plurality and what sort of policy interventions may be warranted. Olaf, turning to his work at the Journalism Trust Initiative with Reporters sans frontières, will describe their example of how industry and civil society are taking advantage of the new media landscape to develop an innovative approach to supporting media plurality in future. Each of our

¹ **Disclaimer:** This background document has been produced by EPRA, an informal network of 53 regulatory authorities in the field of audiovisual media services. It is not a fully comprehensive overview of the issues, nor it represents the views nor the official position of EPRA or of any member within the EPRA network.

contributors will also comment on potential connexions between media plurality and the current COVID-19 pandemic.

This session is the first of two on the Plenary 2 theme of ‘Ensuring plurality in the age of algorithms’. The second session planned for the autumn meeting will focus on practical steps stakeholders can take to ensure media plurality, for example, considering the potential role of funding schemes for quality media. Together they represent a continuation of the discussion started at previous EPRA meetings on the topic:

- 41st EPRA meeting in Berne, 2015, addressed how to measure and assess media pluralism and diversity of media content. [See background paper.](#)
- 45th EPRA meeting in Edinburgh, 2017, placed EPRA at the forefront of debates by running a session on the risks and opportunities of algorithmic content curation. [See background paper.](#)
- 50th EPRA meeting in Athens, 2019, the EPRA background paper on the impact of artificial intelligence and machine learning in the media sector listed securing plurality of opinions and findability of content as a potential field for regulation. The paper identified first regulatory approaches in Europe requiring social networks, platforms and other intermediaries to generate transparency, be it concerning the fact that algorithms are used, or be it regarding information on the way in which algorithms operate. [See background paper.](#)

These are challenging issues which strike at the heart of our statutory responsibilities as media regulators, and of our roles in contributing to democratic society. In this context it is essential that EPRA members collaborate to exchange insights and best practices, and pool together relevant new research which can suggest innovative solutions.

We are grateful for the contributions of EPRA members via the [questionnaire](#)² which have been very helpful to the development of the session and have been incorporated into this paper. While there is really no direct substitute for the vibrance of a panel discussion, we hope that this background paper, the resources recommended to us by EPRA members and the insights provided by our friends in academia and industry prove interesting and useful.

2. Bios of contributors

We are very grateful to Olaf, Eleonora and Elda for lending us their expertise in discussing challenges to media plurality in the age of algorithms. Below are a few notes on our contributors’ professional background and areas of expertise.

Olaf Steenfadt (osteenfadt@rsf.org) heads the [Media Ownership Monitor](#) project and the [Journalism Trust Initiative](#) at the press freedom watchdog [Reporters sans frontières](#). For many years, he has been engaged as a consultant and coach in media development cooperation, mandated by both international organizations and NGOs. He previously worked for national German public broadcasters ARD and ZDF in various roles, including as a radio and TV presenter, investigative reporter, domestic and foreign correspondent, as well as in format development and corporate communication. Olaf is a

² We received responses from the following 20 NRAs:

CTR (AM), CRA (BA), OFCOM (CH), CRTA (CY), DLM (DE), CTRA (EE), CNMC (ES), CAC (ES), CSA (FR), Ofcom (GB), NCRT (GR), BAI (IE), AGCOM (IT), NEPLP (LV), Malta Broadcasting Authority (MT), Agency for Audio and Audiovisual Media Services (MK), NMA (NO), KRRIT (PL), NAC (RO), CBR (SK).

member of the [High-level Expert Group on Fake News and Online Disinformation](#) of the European Commission and of the [Committee of Experts on Quality of Journalism in the Digital Age](#) at the Council of Europe. He teaches frequently at universities in Germany and Europe.

Eleonora Maria Mazzoli (e.mazzoli@lse.ac.uk) is a researcher in the Data, Networks and Society Programme of the Department of Media and Communications at the [LSE-London School of Economics and Political Science](#), where she is pursuing her PhD. She is also currently working with her advisor Dr Damian Tambini for the Council of Europe's [Committee of Experts on media environment and reform](#) on a study on industry trends and policy needs related to the prioritisation of content online³. Her background sits within the interdisciplinary subjects of media economics and media policy. She holds an RMA in media studies from Utrecht University, and a BA in management and economics for arts, culture and communication from Bocconi University. She previously worked for the European Affairs team of Rai, the Italian public service broadcaster, and for the Legal and Policy Department of the European Broadcasting Union, overseeing media policy-related activities, and innovation projects.

Elda Brogi (Elda.Brogi@eui.eu) is Scientific Coordinator of the [Centre for Media Pluralism and Media Freedom](#) (CMPF) at the European University Institute in Florence, which is in charge of implementing the [Media Pluralism Monitor](#), a tool designed to collect and analyse data to identify potential risks to media pluralism in EU Member States. She also teaches Communication Law at the University of Florence. She has served as a member of several expert committees at the Council of Europe: the [Committee of experts on media pluralism and transparency of media ownership](#) (MSI-MED), the [Committee of experts on protection of journalism and safety of journalists](#) (MSI-JO) in 2014-2015, and she is currently member of the [MSI-REF Committee of Experts on Media Environment and Reform](#), and co-rapporteur on the draft recommendation by the Committee of Ministers to member States on election communication and media coverage of electoral campaigns. Member of the Advisory council for the 2017 "World Trends in Freedom of Expression and Media Development" Report, UNESCO. Member of the executive board of EDMO (European Digital Media Observatory). She holds a degree in Law (University of Florence), a Ph.D. in Public Law and Constitutional Law (University La Sapienza, Rome).

3. Defining media plurality

Media plurality is a complex concept that is defined in different ways, with consequences for its measurement. The questionnaire supporting this session therefore encouraged EPRA members to include as much relevant information as possible, and to err on the side of including information or material which they considered could be relevant – even if indirectly.

Media plurality in the broad sense can apply to news and current affairs specifically, or to media in general, including cultural content. A non-exhaustive list of its many components would include diversity of perspectives within media content, or indeed diversity in *who* is represented and reflected in the media. Often it means accurate, objective and impartial reporting of news in accordance with professional journalistic standards, often predicated upon a clear distinction between news reporting and opinion. It can refer to the degree of concentration of media ownership and the rules governing it, and in this context can extend to the related issue of sustainability of news media and their business models; it often implies the special role and responsibilities of public service media in serving public

³ Update 01/12/2020: the report '[Prioritisation uncovered: the Discoverability of Public Interest Content Online](#)' was published on 24 November 2020.

discourse and the prominence regimes which promote it. In current policy debates media plurality is often used in connexion with online disinformation, as a potential policy remedy or, where media plurality is seen to be insufficient, as a potential cause.

The sheer breadth of what can be meant by ‘media plurality’ already suggests challenges to its measurement. Furthermore, media plurality policy is not solely in the gift of NRAs, though they are often tasked with measuring it: of the 19 NRAs that responded to our questionnaire, 15 of them have a statutory role in measuring media plurality. Rather, media plurality policy involves a wide range of stakeholders that include journalists, editors, media providers and audiences. NRAs themselves possess a patchwork of different duties relating to some or all of media plurality’s aspects, and a diverse toolkit of measures to deliver on them. Previous EPRA sessions in 2015⁴, 2017⁵, as well as the ERGA report from 2018⁶ have mapped these tools out in great detail, the latter two focusing on media plurality embodied in content standards for accuracy, objectivity and impartiality, so-called ‘internal’ media plurality. These previous reports remain relevant today, and have provided this session with a good base of evidence and point of departure.

However, it would be helpful to use a working definition that will help structure this session. **The working definition of media plurality used in this session is that of the Council of Europe.**

Media plurality is the “*diversity of media supply, reflected, for example, in the existence of a plurality of independent and autonomous media (generally called structural pluralism) as well as a diversity of media types and contents (views and opinions) made available to the public*”⁷.

This definition provides continuity with previous EPRA and ERGA work mentioned above and delineates the two main types of responsibilities NRAs have in relation to media plurality, so-called internal and external plurality. Borrowing from this working definition, **internal plurality** is the diversity of media types and contents (views and opinions) made available to the public, while **external plurality** is the existence of a plurality of independent and autonomous media.

Another benefit of this working definition is that it is flexible enough to withstand criticism of its own parameters: in the context of media plurality, disagreements about definitions are not purely academical, but have significant practical impact on measurement frameworks and the policy debates they inform⁸. For example, different definitions of media plurality will provide different answers to the following questions, with implications for measurement: *is media plurality measured at the point of news provision, and/or at the point of news consumption?; how to weigh the proportionate impact of external plurality against that of internal plurality?; how can media plurality be measured so as to allow for cross-border comparisons while also taking account of important contextual factors in specific jurisdictions?*. These questions indicate significant trade-offs that must be considered by NRAs when performing their statutory duties.

One potential point of scrutiny for the Council of Europe definition above is how it defines media plurality in relation to news *provision* (‘made available to the public’) as opposed to news

⁴ EPRA, Berne: How to ensure and assess media pluralism and diversity of media content, [background paper](#). 2015

⁵ EPRA, Edinburgh: Filters, algorithms and diversity – turning concerns into opportunities?, [introductory document](#). 2017

⁶ ERGA, [Internal Media Plurality in Audiovisual Media Services in the EU: Rules & Practices](#). 2018

⁷ [Recommendation No. R\(99\)1](#) of the Committee of Ministers to member states on measures to promote media pluralism

⁸ CMPF, [European Union competencies in respect of media pluralism and media freedom](#), EUI RSCAS PP, 2013/01

*consumption*⁹. But can diversity of news *provision* by itself deliver the public policy objectives that media plurality aims to secure? This question is particularly relevant to media plurality in the age of algorithms, for if the answer is Yes, then perhaps the sheer volume of news content online would render policy interventions for media plurality unnecessary. But if the answer is No, this might suggest the current media plurality framework finds itself at risk of ‘policy drift’: only a small minority of NRAs responding to the questionnaire reported media plurality duties extending beyond broadcast TV and radio despite the trend that more and more news media is now consumed online.

Arguments in favour of media plurality as news *provision* find advocates around the world. One such argument has previously been made in the context of the relative abundance of new channel capacity offered by cable television, and contributed to the American communications agency, the Federal Communications Commission in 1987 revoking its ‘Fairness Doctrine’, an internal media plurality policy which since 1949 had required all terrestrial broadcast channels to meet quotas for news and current affairs, and to ensure that it was balanced and fair¹⁰. Today the differences between the American and European news media landscapes are stark. Clearly, therefore, conceptual definitions of media plurality can have significant impact on democratic discourse.

In order to examine the hypothesis that abundance in online news supply secures media plurality, it is necessary to discuss why media plurality is important in the first place.

4. Theoretical framework

European texts on media and human rights assert that **media plurality is not an end in itself but is a means to securing democratic discourse**. Its central role in democratic society and cultural life is reflected in its inclusion as Article 11 of the EU Charter on Fundamental Rights¹¹ and as an objective of the Audiovisual Media Services Directive, where it is entrusted to National Regulatory Authorities (Article 30 and Recital 53). The wider theoretical framework considers media plurality to be connected to - and contingent upon - first securing media freedom, the ability of the press to hold power to account¹². The connexion between media plurality and media freedom was commented on by the Malta Broadcasting Authority who in their survey response mentioned the recent Media and Defamation Act which seeks to strengthen the freedom of the media by abolishing criminal libel and prohibits the issue of precautionary warrants in defamation cases¹³.

The connexion between the rights and responsibilities of the press and media plurality policy is also evident in their respective historical development. Media plurality policy finds its roots in the standards and ethics of journalists that were codified in the early 20th Century. The principles of

⁹ This is made explicit in the text of the recommendation which reads: “*It should be stressed that pluralism is about diversity in the media that is made available to the public, which does not always coincide with what is actually consumed*”.

¹⁰ Sambrook, Richard. [Delivering Trust: impartiality and objectivity in the digital age](#). Reuters Institute, 2012.

¹¹ Article 11(1) *Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. (2) The freedom and pluralism of the media shall be respected*”.

¹² CMPF, op. cit. see footnote 7.

¹³ The recent Media and Defamation Act in Malta strengthens the freedom of the media by abolishing criminal libel and prohibits the issue of precautionary warrants in defamation cases.

objectivity and impartiality were explicitly developed by journalists and editors to mitigate against their natural personal and political biases and encourage trust in newspaper journalism. Objectivity was expected at the point of journalistic reporting (inputs) rather than at the final published output, and so to a great extent it was inherent to the expectations of professional ethics and good faith.

These concepts were later adopted by regulators for application to the new broadcast media, adapted to contemporary public policy concerns about the risks of the supposedly more 'passive' nature of TV and radio consumption which left people vulnerable to manipulation¹⁴ and a highly concentrated media landscape (in many cases a monopoly) resulting from scarcity of spectrum and the high cost of entry¹⁵. In Europe these eventually became the basic components of media plurality policy. From its very genesis then, media plurality has adapted to new changes in technology and society.

Certain similarities between broadcast regulation and journalistic standards and ethics remain evident today: to a large extent internal plurality measures for news broadcasters remains a matter of professional ethics for which regulation by NRAs can only function as a backstop. As noted in the 2018 ERGA report, this creates potential for this process to be undermined by broadcasters acting in bad faith¹⁶. It also raises questions about how these professional standards and ethics can be expected of non-professional news content that is increasingly characteristic of the digital media landscape.

Common objectives of media plurality

As explained above, different definitions of media plurality lead to differences in measurement frameworks and the policies they inform. But they share a common theoretical framework based on the argument that media plurality is not an end in itself but is a means to securing democratic discourse, an argument supported by the Council of Europe which in its 2018 recommendation on media pluralism and transparency of media ownership states that:

[media freedom and pluralism] "are central to the functioning of a democratic society as they help to ensure the availability and accessibility of diverse information and views, on the basis of which individuals can form and express their opinions and exchange information and ideas"¹⁷.

Similar accounts of media plurality have also been provided by the European Commission¹⁸ and in rulings from the European Court of Human Rights¹⁹. This argument introduces a normative aspect to media plurality policy: media plurality is *successful* only insofar as it serves the open, honest debates between citizens about alternative viewpoints which sustain deliberative democracy – a difficult thing to measure. It feels particularly urgent in today's era of global politics, where the media can often be the only avenue available to citizens for critically engaging with esoteric policy issues and for scrutinising political decisions. Likewise, the media can help give voice and platform to citizens'

¹⁴ As articulated by Theodore Adorno and Max Horkheimer in *Dialectic of Enlightenment*, 1947

¹⁵ Sambrook, Richard, op. cit. see footnote 9.

¹⁶ ERGA report 2018 page 84, op. cit, see footnote 5.

¹⁷ Recommendation [CM/Rec\(2018\)1](#) of the Committee of Ministers to member States on media pluralism and transparency of media ownership.

¹⁸ Oreja, Marcelino. (1998) The Digital Age: European Audiovisual Policy. [Report from the High Level Group on Audiovisual Policy](#), 1998.

¹⁹ E.g. [Informationsverein Lentia and Others v Austria](#), 1993.

concerns, something we are reminded of in the current climate of increasing political unease and the disenfranchisement felt by many constituents whose voices are not heard by politicians.

Media plurality can be seen to play the following roles in support of democratic discourse²⁰:

- Maintaining the integrity of the democratic process
- Preventing media misrepresentation and the suppression of information
- Enhancing citizens' access to diverse information and opinions
- Protecting freedom of expression

Achieving these objectives can be difficult, relying as it does on some kind of "ideal" behaviour in people, not always reflected in reality: confirmation bias is well-documented in human psychology and there is evidence that suggests people's choice of news source reflects similar tendencies²¹ potentially obstructing their responsibility to give fair consideration to the views of other citizens as required of the deliberative democratic process. It is possible that even where there exists an abundance of media providers, media plurality may not be achieved if people only consume news that affirms their pre-existing viewpoints. This is likely to be further exacerbated by personalisation of content in an online environment, and becomes a particular problem when we factor in the problems associated with the spread and amplification of mis and dis-information, which may have the look and feel of professionally produced news that we assume complies with agreed editorial and ethical standards.

In this context, it is interesting to return to the 1987 decision of the FCC to revoke its Fairness Doctrine. One compelling explanation given for the comparatively high degree of news polarisation in America²² is that by revoking the Fairness Doctrine the FCC simultaneously did away with internal plurality requirements *and* released TV channels from news and current affairs quotas, allowing people for the first time to avoid news completely. As a consequence, news channels were forced to compete with entertainment programming, incentivising an increasingly dramatised and partisan reporting style to attract viewers²³. The media landscape in the USA may serve to illustrate the consequences of plurality in media supply without plurality in consumption: according to Pew Research Center, today "Republicans and Democrats place their trust in two nearly inverse news media environments"²⁴. It is very tempting to see parallels between the dramatic increase in media providers caused by the introduction of cable television, and the exponential increase in media supply and consumption caused by the internet.

Finally, it is worth noting that given the underlying consensus on the *objectives* of plurality policy, a degree of flexibility in how states can ensure media plurality is possible: democratic discourse may be sustained even where there is a significant degree of media concentration, if for example internal media plurality measures are so effective as to provide citizens with a sufficient diversity of viewpoints, or similarly, where a genuinely independent public service broadcaster accounts for the majority of

²⁰ CMPF, *op. cit.*, see footnote 7.

²¹ Richard Fletcher & Joy Jenkins. [Polarisation and the news media in Europe: a literature review of the effect of news use on polarisation across Europe](#), Reuters Institute for the European Parliament, 2019.

²² Pew Research Center, '[U.S. media polarization and the 2020 election: a nation divided](#)', 2020.

²³ Prior, Markus. *Post-Broadcast Democracy*, 2007.

²⁴ Pew Research Center, *Op. cit.* See footnote 21.

news consumption. Media plurality policies can therefore differ significantly between states, which presents a challenge to measurement frameworks that aim at making cross-border comparisons.

Structural aspect and measurement frameworks

The other major aspect of media plurality is structural, bringing together all the elements that serve as a picture of plurality in a media landscape. According to the Centre for Media Pluralism and Media Freedom, these structural elements are:

- Sources (the diverse range of independent news media voices across all platforms)
- Distribution (high overall reach and consumption among all consumer demographics and region - in upstream distribution on new media this could include net-neutrality)
- Demand and consumption culture
- Market players (barriers to entry and competition amongst providers)
- Market sustainability
- Guarantee of high-quality coverage
- Extensive newsgathering and investigative journalism
- Political representation

These form the basic indicators of media plurality measurement frameworks which many EPRA members are tasked with developing and applying (15/19 questionnaire responses). NRAs differ on the indicators they use and the aspects of media plurality they measure, for instance focusing on either external or internal plurality. Each of the elements above can be seen to roughly correspond with one or more of media plurality's agreed objectives. Most can be measured directly or via proxies, and then either quantitatively or qualitatively.

One example of an indicator which strings several of the above elements together and covers online media is Ofcom UK's *share of references* metric, used for measuring cross-media consumption. It is calculated by asking people which news sources they use and the frequency with which they use them. Each reference is then weighted for the frequency of use, and summed. The share of each source or provider can then be calculated based on their total number of references as a proportion of all references for all news sources, regardless of the platform or media. But like all proxy indicators, *share of reference* is most valuable when incorporated into a wider measurement framework that includes quantitative and qualitative, contextual components, which help to mitigate the criticism that it relies too heavily on self-reported consumption data.

Measurements of these indicators in themselves do not comprise an assessment of media plurality health and need to be compared to some other metric in order to do so. This could be a baseline of media plurality 'sufficiency', below which media plurality can be assessed as insufficient. More commonly, NRAs will compare a current measurement of media plurality to the potential consequences of a specific media merger, allowing the NRA to come to a view on the merger's merits and demerits (e.g. GB, IE, NO). In Ireland, the BAI has a duty to carry out an *ex post* review of media mergers every three years and submit their findings to the Secretary of State. However, both of these approaches to agreeing a metric are subjective and can be politically fraught. A third option, that of a risk-based approach, has been developed by Peggy Valcke and colleagues in their influential report for

the European Commission from 2009²⁵. It attempts to measure the probability of harm being done to individual indicators of media pluralism across legal, economic and socio-cultural domains and assigns them a risk scale of low, medium and high. This has since been made the basis of the Media Pluralism Monitor (MPM), led out of the Centre for Media Pluralism and Media Freedom in Florence, and recently updated to reflect changes in technology and media emerging in the age of algorithms. Elda Brogi, scientific coordinator at the Centre, will be joining us to discuss these updates to the MPM tool.

There are trade-offs between media plurality's structural elements listed above. For example, an increase in the diversity of news sources across all platforms by the introduction of new news media providers may apply competitive pressure on revenues that result in less funding being allocated to newsgathering and investigative journalism. The indicator of 'sustainability of the news media market' is an inherent trade-off in itself, between theoretical objectives for news media organisations and the real-world understanding that media enterprises must attract and entertain viewers to remain commercially viable and survive (this is true even of publicly-funded media providers who still need to demonstrate value-for-money). Media plurality policy does not take place in a vacuum: there will necessarily be concessions to ensure the overall sustainability of news provision.

5. Current policy measures for securing media plurality

This section helps frame our discussion by briefly outlining the main policy measures currently available to NRAs for securing media plurality, first looking at those which are more immediately in the gift of regulators, and then at those which are applied in cooperation with stakeholders. It is worth noting that only two NRAs responding to the questionnaire – DE and NO – indicated that they have statutory responsibilities for securing media plurality across all media (that is to say, beyond television and radio). This section therefore focuses on the measures available to the majority of NRAs and so focuses on internal and external plurality in broadcast media as well as public service broadcasting and media literacy.

As suggested earlier, the multifaceted character of media plurality means that none of these regulatory measures or policies in isolation can be expected to secure it. But NRAs have a special role as convenor and coordinator of the best efforts of a variety of stakeholders including government and legislators, journalists and editors, media providers and distributors, advertisers and other sources of media funding – and a critically engaged public.

Regulatory measures

The performance of duties relating to media plurality is one of NRAs' more public-facing activities, and their effectiveness may be seen to correspond to citizens' trust in broadcast news media: broadcast news tends to rank more highly than other news media for people's trust²⁶.

²⁵ Valcke, et al. "[Independent study on indicators for media pluralism in the Member States – towards a risk-based approach](#)". For the European Commission, 2009.

²⁶ See for example: [Ofcom, News Consumption Report 2019](#); [Special Eurobarometer 452: Media pluralism and democracy](#), 2016.

According to the 2018 ERGA report, NRAs tend to have two types of regulatory measures available for securing media plurality, which correspond to each of internal and external plurality²⁷.

- **Measures to support internal plurality** include: content standards, usually applying to news and current events programming, requiring one or more of accuracy, objectivity, impartiality; quotas on specific types of programming; measures relating to ensuring editorial independence from owners.
- **Measures to support external plurality** include: rules governing media ownership and concentration (including via monitoring delivery on licensing conditions and ‘beauty contests’), special powers to intervene in media mergers on public interest grounds.

Other important regulatory measures which not easily fit into either category include moratoriums on types of reporting during elections periods, specific rules governing political advertisements and party-political broadcasts. Media plurality measurement itself is cited by NRAs as a regulatory measure by virtue of it drawing political/public attention to concerns.

Public service broadcasting and prominence

Public service broadcasters (PSBs) are particularly valuable to media plurality policy, provided they are genuinely independent from the state and have appropriate levels of funding and oversight²⁸. Supporting PSBs is often the central pillar of NRAs’ media plurality policy. PSBs tend to be less incentivised to providing more polarised news as a result of being placed under more specific internal plurality standards than commercial TV or newspapers, and of having duties to provide content that is relevant to all citizens. When their funding is appropriate and secure, PSBs are also more resilient to the commercial pressures to reduce spending on public interest journalism like local and investigative journalism which tend to be more expensive to produce, and consequently are currently at serious risk in commercial media²⁹. Furthermore, genuinely independent PSBs are often the most widely used and most broadly trusted news providers in many European countries³⁰, and research shows they contribute to a more informed public³¹. Stronger PSBs tend to show more news at primetime, and consequently make smaller the gaps between the most and least politically engaged individuals³².

These factors make PSBs ideally positioned to reflect the public back to itself, and to host the sort of public discourse between constituencies that sustains democratic society. The importance of PSB to ensuring media plurality is recognised by the recent Council of Europe recommendations on the topic from 2018.

All of the benefits from PSB can be enhanced by securing PSB **prominence** or discoverability. This commonly involves requiring electronic programming guides (EPGs) to list PSB channels in places where they are more likely to be discovered by audiences. It can help secure audience viewing for PSBs which generates a virtuous circle of impact of quality programming, increased audiences, and

²⁷ ERGA op. cit. see footnote 5.

²⁸ Nielsen, Gorwa, de Cock Buning, ‘[What can be done? Digital media policy options for strengthening European Democracy](#)’, [Reuters Institute report 2019](#).

²⁹ The [Cairncross Review](#): A sustainable future for journalism, an independent report for the UK Government, 2019.

³⁰ See Ibid., 34., and the EBU MIS report ‘[Market insights: Trust in media 2020](#)’, April 2020.

³¹ Aalberg and Curren 2012, cited in Ibid., page 34.

³² Castro-Herrero, Nir and Skovsgaard, ‘Bridging gaps in cross-cutting media exposure: the role of public service broadcasting’, 2018.

more secure funding. Prominence regimes for PSBs in EPGs are currently in place in some European countries (for example in the UK) and others may soon be taking advantage of Article 7(b) of the revised AVMS Directive³³ to do so as well (for example in Germany).

Nevertheless, PSBs can also present a theoretical risk to media plurality by having a potentially anti-competitive effect on the sector. Exactly how PSB contributes to overall media plurality is the subject of contentious debate, one which is easily politicised and often involve NRAs. In 2019, the Norwegian Media Authority carried out an impact assessment of the public service broadcaster's (NRK's) online offering on media plurality³⁴. The final report recognised that commercial media providers face a challenging period, but that NRK makes a net positive contribution to media plurality by fulfilling its public service broadcasting remit and that NRK's online news and current affairs offering in particular has a positive impact on the public discourse.

Direct funding schemes

Funding schemes managed independently by NRAs with the object of enhancing the variety of specific types of quality programming have also proven a successful means for securing media plurality. Examples of this include the Irish Sound & Vision funding scheme³⁵ for television and radio administered by the BAI that provides funding in support of high quality programmes on Irish culture, heritage and experience, as well as programmes to improve adult literacy; and the Croatian Fund for the Promotion of Pluralism and Diversity (Fond za pluralizam³⁶) administered by the AEM which supports production and broadcasting of programmes of public interest in local and regional radio and television channels, as well as financial support for electronic publications serving local communities.

It is essential that such funding schemes are independently administered to mitigate the risk of them being used to influence news reporting of those organisations receiving funding.

Media literacy

Media literacy is hugely important in securing media plurality because it helps equip people with the skills to critically engage with news they consume and understand how it is framed by the perspective of the news provider. This may in turn encourage people to diversify their news consumption diets, enhancing their frame of reference as citizens. Promoting media literacy is a statutory duty for many NRAs³⁷ and indeed for ERGA, a task given additional weight by the recently revised AVMS Directive.

What it means to be 'media literate' has changed with the advent of new media and the sophisticated technological systems which have propelled it. It is now frequently associated with broader 'digital literacy' of computer technologies: how to mitigate its risks and take advantage of its potential benefits. The topic of news consumption habits illustrate where media literacy and digital literacy intersect: it is impossible now to speak of source-checking and critical reading skills without also

³³ "Member States may take measures to ensure the appropriate prominence of audiovisual media services of general interest".

³⁴ https://www.regjeringen.no/contentassets/d385c22cd19a4e509926f8e43fca7ba7/english_summary_media_pluralism_in_norway_mediemangfoldsutvalgets_nou_2017.pdf

³⁵ <https://www.bai.ie/en/broadcasting/funding-development-3/#al-block-2>

³⁶ <https://www.aem.hr/kategorija/fond-za-pluralizam/> <https://en.unesco.org/creativity/policy-monitoring-platform/fund-promotion-pluralism>

³⁷ See EPRA overview report on MIL and the role of NRAs: <https://www.epra.org/attachments/vienna-wg-i-media-literacy-focus-on-the-role-of-regulators-background-document>

discussing indicators that a website is likely to be bogus or the types of questions one should ask about why a particular news item has been recommended to your 'news feed'. And it seems unavoidable that, as technology looks likely to bring complex artificial intelligence and machine-learning ever closer to our everyday (including in our consumption of news), our expectations of what it means to be media literate should continue to increase and become more intertwined with digital literacy. EPRA tends to use the more comprehensive term of Media and Information Literacy (MIL) in part to take account of exactly this trend.

But despite increasing awareness about the role of MIL in protecting democratic discourse online, it seems that many current MIL initiatives are failing in this exact respect: a recent Council of Europe study on MIL across 68 projects in 31 countries found a mismatch between the majority of MIL projects and the tools needed to foster quality journalism³⁸. NRAs are well-positioned to help give direction on this issue with their unique power to convene a wide range of relevant MIL stakeholders. **There are also opportunities ahead to help address this issue at the European level, including by contributing to the European Commission**

6. Key changes in technology and media consumption

To enable our contributors to focus their remarks on the *impacts* of changes in technology and media consumption and avoid a lengthy discussion of the changes themselves, this section outlines the key features of the new media landscape and what they imply for plurality policy.

Risks to media plurality posed by new technologies and media consumption patterns are the subject of considerable research, but we may also know them anecdotally: concepts like 'echo chambers', 'filter bubbles' and disinformation have entered into mainstream public discourse, and many of us may have encountered instances of them in our personal lives. However, a more comprehensive account of these changes is required for our discussion. For that we turn to the 2018 ERGA Report, which sets out a non-exhaustive list of salient changes which together can be considered to illustrate the 'age of algorithms'³⁹. These features are set out below.

- the internet reduces barriers to entry into the market for news, leading to an abundance of news services available to citizens online;
- most people accessing news online do so indirectly instead of going through news websites or applications;
- the news is increasingly viewed on smartphones in the form of 'news feeds';
- content discovery online is fragmented;
- in the absence of editorial curation, the news is now sorted into 'news feeds' by a combination of algorithms and personalisation by users;
- for most users of social media, the route of content discovery is guided by endorsements and recommendations by friends, with news items discovered in this way less likely to be challenged;

³⁸ <https://rm.coe.int/prems-015120-gbr-2018-supporting-quality-journalism-a4-couv-texte-bat-/16809ca1ec>

³⁹ ERGA, op. cit., see footnote 5.

- news content which particularly resonates with members of a social network can go viral, intensifying its effect.

These features paint a picture of a media landscape still in flux, one that does not yet appear to have reached the relative stability that characterised broadcasting for many decades, or print before that. This uncertainty presents several challenges to media plurality policy: the effectiveness of current measures for securing it are at risk of ‘policy drift’ as they may no longer adequately apply to changing conditions⁴⁰, and its key pillars – sustainability of business models, for instance – are coming under serious strain. But this period also represents an opportunity for NRAs and stakeholders to reach a new consensus around media plurality and the distribution of responsibilities for ensuring it, one which takes advantage of new opportunities to engage citizens in the process.

7. Potential impact on media plurality

Our contributors’ main topic of discussion will be on the potential impact of the aforementioned changes on media plurality, its measurement, its stakeholders, and on potential responses. Our discussion will focus on the following aspects:

Changes to news consumption and critical engagement. The abundance of entertainment content online coupled with business models of the platforms which carry it - based on attracting and maintaining users’ attention - may make it more challenging for news media organisations to reach their audiences in this media landscape. Research suggests that among people who access news online, the amount of time people actually devote to it is decreasing, due to differences in online and offline reading habits. For example, people tend to passively skim-read articles online, resulting in poor memory recall and critical engagement⁴¹.

Recent studies suggest that media literacy approaches based on behavioural science can help mitigate exactly these cognitive tendencies. A European Commission study on media literacy and online empowerment issues from 2019⁴² suggests concrete ways that social media platforms can counter cognitive biases and trigger a more analytical type of thinking by online users by applying insights from behavioural science, for example prompting users to pause for a moment and consider what it is they are about to share or read. The potential benefits of behavioural insights in encouraging plurality of media consumption - in particular when these are applied using AI technologies - have been discussed at EPRA before⁴³.

Changes to editorial decision-making and news curation. Editorial decisions once held by editors and journalists have to some extent been redistributed amongst the new media value chain. Online platforms serving as intermediaries can now curate the news that is served to end-users both indirectly via algorithms, but also more explicitly as editors themselves (like Apple News which has staff making daily decisions about ‘top stories’). People can also now personalise the news that is

⁴⁰ Nielsen, Gorwa, de Cock Buning, op. cit., footnote 27.

⁴¹ ‘Scrolling news: The changing face of online news consumption’, Revealing Reality report for Ofcom, 2018.

⁴² Study on [media literacy and online empowerment issues raised by algorithm-driven media services](#), 2019.

⁴³ EPRA Athens, [background paper on Artificial Intelligence](#), 2019.

served to them to a degree not previously possible in broadcast and newspaper media, raising concerns about people inadvertently closing themselves off to challenging news content. Furthermore, information on the decisions people make about the news they see and the extent to which they engage with it, can eventually be fed back to news media organisations as user-data, which can be analysed for insights into audience preferences. In some contexts, this sort of information can be employed to make news media organisations more competitive and ultimately more profitable. But it also creates the risk of a feedback loop, where news media organisations learn to provide people with the news coverage they prefer, rather than the news coverage they need as citizens.

This new dynamic also creates the opportunity for increased diversity in news sources. By virtue of their position in the news media value chain, intermediaries have created new tools enabling them - and users - to intentionally curate news diet to include different political perspectives. Apps like 'Read Across The Aisle' exist to make this effort seamless.

'Kitemarking' tools are another innovative solution. These tend to operate by indicating trustworthy, or high-quality news content to readers (public facing), but also to distributors and advertisers (business-to-business). Kitemarking carries potential benefits to both the supply and the demand sides of the media landscape, much like the virtuous circle of prominence in broadcasting. If used as a basis for online platform intermediaries to allocate prominence to trustworthy or 'quality' news, kitemarking can help inform user preferences, direct user content navigation, maintain their attention and increase revenues for both news publishers and platforms. But there is contradicting research about the effectiveness of these tools in attracting readers, including that [they can sometimes have the opposite effect](#).

These sorts of initiatives may also inadvertently create risks to media plurality and media freedom by their vulnerability to abuse by the state or by media ownership, who might be tempted to leverage offers for financial sustainability to influence news media organisations. If badly designed, kitemarking may also grant prominence to large news media companies at the cost of local or regional news, and in doing so represent a net negative effect on media plurality.

It's with exactly these types of considerations in mind that the JTI have been consulting on their proposal for an industry standard for quality journalism, one which is machine-readable and user-friendly. The JTI spent 2019 consulting stakeholders across Europe on its draft list of trust indicators which was finally adopted and published as Workshop Agreement by the European Committee of Standardization (CEN) in December of 2019. Olaf will discuss how this project addresses these potential challenges and can contribute to media plurality, media literacy and media sustainability.

Public service broadcasting. PSB in Europe remains widely supported and consumed by the public. While questions about their funding or wider regulation are not the topic of this discussion, PSBs' wide consumption and the public's trust in them are some of the most valuable assets to media plurality policy in the new media landscape. Nevertheless, PSBs face serious challenges in this context, including how to maintain their relevance to younger audiences moving away from the relatively secure space of broadcast media towards online, and how to ensure they are recognised as the producers of news media content when it is accessed by users via online platform intermediaries.

One potential solution is to expand existing **prominence** regimes to digital media. Ofcom UK has recently published a statement recommending that the government legislate to require due prominence for PSB video on-demand players on internet-enabled TV sets (smart TVs), streaming

'sticks' and digital set-top boxes. Germany is also in the process of developing a similar regime under its new Interstate Treaty for Media (described in more detail below).

Impact on sustainability of news media. As news consumption moves online and increasingly via intermediaries, the commercial consequences for news publishers becomes a consideration in media plurality policy. There have been several recent studies made into the commercial relationships between online platforms and news publishers, including into the complicated market for programmatic online advertising (ad tech) which accounts for increasing percentage of overall ad spend and whose revenue is mainly collected by online platforms. With less revenue, many large news providers are cutting costs to remain profitable, and often these cuts are made to investigative and local journalism, which tend to be the most expensive and least profitable. This might present an existential risk to these types of journalism, which are also some of the most valuable to ensuring media plurality.

There has been considerable progress made on this issue recently. Industry solutions have started to appear, for example, the 'whitelisting' logic of a tool like JTI, whereby advertisers privilege authoritative news sources as 'brand safe', could also help to re-align ad-spend with compliance with professional norms in journalism and thus reward and remonetize authoritative sources. In the public policy sphere, the EU the Copyright Directive grants news publishers (including news websites) an exclusive right to authorise the use of their content by online platforms, and also requires that authors and journalists receive some remuneration for contracts entered into by their newspapers with platforms. The law is already being put into effect in France by the French competition authority, which has invoked it to [order Google to negotiate](#) 'in good faith' with French publishers and news services over licensing fees it should pay for news content. The authority said talks should be wrapped up within three months and insisted that they should result in a 'remuneration scheme' for the publishers. It's possible that once news providers and platforms enter into licensing contracts as per the Copyright Directive, that the EU's Platform-to-business Regulation (P2B) which will come into force from July 2020 will also apply. P2B requires platforms to set out in their terms and conditions the main criteria for giving prominence to clients' content, and to give them 15 days notice ahead of changes to Ts & Cs.

Elsewhere, the Australian Digital Platform Inquiry⁴⁴ and the UK's Cairncross Review⁴⁵ make similar recommendations for new *ex ante* Codes of Conduct that would govern how revenue is shared between platforms and publishers, and create new rules for data-sharing and increased transparency in how online platforms and intermediaries arrange and display news content. The EU's Digital Services Act currently in development may very well take a similar approach.

Disinformation. Media plurality policy in broadcast media aims at discouraging the spread and impact of disinformation by requiring that news and current affairs programming meet certain content standards, by preventing any one media provider from having too loud a voice in public discourse, and by ensuring that the population has access to a wide range of reliable and trustworthy news sources. Online disinformation can also be addressed by media plurality policy, though not necessarily by means of those measures available to NRAs. The 2018 ERGA report observed a dramatic 'policy drift'

⁴⁴ <https://www.acc.gov.au/system/files/Digital%20platforms%20inquiry%20-%20final%20report.pdf>

⁴⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779882/021919_D_CMS_Cairncross_Review_.pdf

on disinformation, as there are few regulatory responses that have proven adequate to the task of preventing it in new media as has been largely achieved in broadcast. There have been recent attempts to address this. The EU Code of Practice on disinformation signed by major online platforms in September 2018 included commitments to promote news and current affairs from authoritative sources, as well as commitments to empowering users via media literacy and transparency. Several EPRA members have contributed to the Code's review by ERGA, which published its final report⁴⁶ in May 2020. The European Commission is itself reviewing the Code and is expected to announce next steps over the summer.

Separately to the Code's review, on 10 June 2020, the Commission announced a series of new measures for tackling disinformation in the context of COVID-19. These include requiring platform signatories of the Code to publish monthly reports on progress they have made to promote authoritative content on the Coronavirus pandemic - from health organisations, governments and news media - and empower users, including by making them aware when they've made contact with online disinformation. These are promising developments, especially as the announcement recognises that disinformation must be tackled by a combination of media literacy and media plurality policies and with the vital support of a free and sustainable press. The Commission indicated that these crucial points will be covered in the Democracy and Media Action Plans later this year, and possibly via the Digital Services Act.

Approaches to regulatory oversight. Media plurality policy is constrained in the new media landscape in part because new media is not explicitly in scope of NRAs regulatory duties or measures. New media has also introduced challenges in the very process of regulatory oversight, e.g. access to information, information asymmetries and challenges in oversight resulting from rapidly changing algorithms.

Some countries have already moved to extend the duties of regulators for securing media plurality policy to the new media landscape: Germany is in the process of ratifying the new 'Interstate Treaty on Media' which would give NRAs new powers to secure media plurality - including transparency, visibility, findability - on 'intermediaries'. The same law will also simplify the licensing of small-scale streaming services (like gaming streams on YouTube), and may seek to reform laws governing media concentration, to take account of changes in media use online.

As news consumption across Europe moves steadily online, how can measurement frameworks adapt to take account? Recent publications from EPRA members acknowledge this as a particular challenge (e.g., Ofcom 2019) or represent an attempt to address this challenge (Norwegian impact assessment of online PSB).

List of potential questions raised

We will endeavour to discuss some of the questions below. These may also be useful to NRAs as guiding questions to consider if updating their media plurality policies.

- How do new media consumption patterns present challenge for media plurality policy? How can stakeholders help improve the quality of news being served to people online?

⁴⁶ <https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf>

- Have the changes to the editorial and curational processes had a positive or negative effect on media plurality? How might the role of the editor change to adapt to the new online landscape?
- What indicators should be used in kitemarking initiatives? How can these be developed without risking media freedom?
- Which co-regulatory framework is needed to implement an instrument like JTI? Are there ways for NRAs to incorporate it as part of their media plurality policy?
- How can PSBs adapt their strategies to take account of trends in media consumption in younger demographics which are moving online? How severe is the problem of brand attribution away from PSBs who produce news content, and towards the online platform intermediaries increasingly important in its distribution?
- Should PSB prominence in the new media landscape be secured by means of regulation? Which of the new actors in the media value chain be covered?
- What plurality measures are available to NRAs to help tackle disinformation?
- What other plurality measures might there be, and who is responsible for applying them?
- What new indicators might be necessary for measuring media plurality in the new media landscape? And what methodological obstacles and opportunities for measurement have been introduced by new media, for example, wealth of data about exactly how news media is consumed by citizens, but which may not be accessible by civil society or NRAs?

Annex: New research suggested by EPRA members

In addition to the resources referenced in this paper, EPRA members suggested a raft of recent publications relevant to media plurality policy debates. These are listed by country below with links where possible and include short descriptions where provided by members. The list refers to English translations of documents where these are available.

BA:

- [Disinformation in the online sphere: The case of BiH](#), May 2019. Report into disinformation in Bosnia and Herzegovina (BiH) by fact-checking platform Raskrinkavanje.ba, with the financial support of the EU. Using a novel methodology which combines fact checking and data analysis, this research into the scale and scope of disinformation in online media is the first of its kind in Bosnia and Herzegovina. Using the material from more than 450 digital media, it provides insight into patterns of creation and distribution of disinformation targeting the citizens of BiH, as well as its neighbouring countries. The report also investigates the complex relations among individual media, using algorithm analysis to establish whether there are groups of media that are prone to continuously, regularly and frequently using each other as sources and redistributors of the same disinformation.

DE:

- [Annual report](#) of the German Commission on Concentration in the Media (Kommission zur Ermittlung der Konzentration im Medienbereich – KEK), 2019 (in German)
- [6th Media Concentration Report](#) (KEK), 2018 (in German)
- [Media Diversity Monitor](#) (KEK), 2020 (in German)

ES:

- [Newsletters on audiovisual media Sector of Catalonia](#), issued every 4 months (most recently from November 2019).
- [Reports on the audiovisual sector of Catalonia](#) (most recently from 2018).(in Catalan)
- [Quaderns del CAC](#), publication promoted by the CAC with academic insights on topics relating to the audiovisual sector (most recently April 2020). (in Catalan)

GB:

- [Furman Review of competition law in the digital age](#), 2019. The UK Government commissioned Jason Furman, economist and former advisor to President Obama, to report on the suitability of the current competition framework to properly ensure competition in digital markets. This was run independently from the Cairncross Review but share some similar conclusions. Furman published this report in March 2019, and recommended updated rules governing merger and antitrust enforcement, and proposed new ex ante rules for major platforms with 'strategic market status'. These would be subject to codes of practices governing their relations with third-party business, potentially including platform relations with news service providers and broadcasters. The UK Government is now considering the report's recommendations and will decide how to implement these in a Green Paper expected in 2020.
- [Ofcom research into Online market failures](#): In October 2019, Ofcom published a paper that aimed to contribute to the UK's discussion on how to address online harms effectively,

drawing on our experience as the UK communications regulator. This has a section looking at the risks to media plurality and news quality.

- [News consumption report 2019](#). This research is intended to inform Ofcom's understanding of news consumption across the UK and within each of the nations. It examines people's consumption of, and attitudes towards, different types of content on different platforms.
- [BBC News Review October 2019](#) and related research. This review gathered views from people across the country on what they thought of the BBC news and current affairs output and how they felt it could be improved. Ofcom also commissioned a raft of research from qualitative workshops, content analysis of BBC news output, social media analysis of how links to BBC news are shared between people online, deep-dive into news journey research, smartphone usage analysis and industry metrics.
- [Revealing Reality report 'Scrolling News: the changing face of news consumption'](#) published 2018. Ofcom commissioned this report into how people access, read and critically engage with news online. It compares people's own self-assessment against the observations made by researchers.
- [Jigsaw research "The changing world of news: qualitative research"](#) from 2018. Another piece of research supporting Ofcom's News Consumption Survey. This report provides qualitative research into why people engage with news, how people define 'the news', the role it plays in their lives and how they select news sources.
- [Ofcom's rolling research on COVID-19 news and information consumption and attitudes](#). Updated weekly.
- A suite of research reports published (6 April 2020) by Enders Analysis on the effects of COVID-19 on the UK's media sector:
 - o ["News media challenges brought to a head - Structural change in news and magazines accelerates"](#). Summary: COVID-19 has sent online news surging, with publishers experiencing massive traffic uplift, as trusted news sources become increasingly important. But the industry is still heavily reliant on print revenues, and supply chains come under extreme pressure as core readers self-isolate and retail giants close or de-prioritise news media. Advertising- including categories like retail and travel- has collapsed. In face of existential threats to the sector, Ofcom has written to DCMS to mobilise Government funding to sustain news provision and journalism
 - o ["COVID-19 TV impact: permanent change without intervention"](#). Summary: COVID-19 has led to an unprecedented decline in advertiser demand for TV, and while the steepest drop has occurred, broadcasters will feel the impact over a long period of time. Programming costs are being cut or deferred, but it is not possible - or even sensible - to reduce total programming budgets significantly in the mid-term due to existing contractual commitments. Increased government support in the form of advertising spend, a loosening of Channel 4's programming obligations - the lifeblood of the independent production sector - and revisions to existing measures (to capture a greater proportion of freelancers) will be required to ensure a flourishing, vibrant sector for the future.
- Reuters Institute at the University of Oxford: ["A mile wide, an inch deep: Online news and media use in the 2019 UK General Election"](#) (February 2020). Summary: Young people (18-34s) spent an average of just eight minutes a week with news websites during the recent UK election campaign and showed little inclination to consume traditional news sources either.

By contrast, older people (35-65) accessed almost three times as much online news (22 minutes a week) and consumed more TV, radio and print as part of their media diets. This is one of the key findings from the most detailed and comprehensive analysis to date of news use during the 2019 UK election, based on a unique tracking study of the online news consumption of 1,711 people throughout the six-week campaign, combined with surveys before and after the vote. Across the whole online population, news websites had wide reach (72%) but relatively little engagement. Despite the critical importance of the election in defining the Brexit outcome, interest fell over the course of the campaign and visits to news websites over the period accounted for just 3% of all internet time.

IE:

- [BAI Media plurality policy 2019](#). Statement of the BAI's media plurality policy.
- [Sound & Vision 4 funding scheme](#), BAI, April 2020. Publication detailing the latest iteration of the Irish contestable fund supporting a range of Irish programming.
- [BAI Annual Report 2018](#), see Section 1 detailing activities promoting diversity and plurality.
- [CodeCheck 2020](#), April 2020. Final report from the Institute for Future Media and Journalism commissioned by the BAI. Reports on the progress of Facebook, Google, Twitter and Microsoft as they strive to increase their accountability for the content that is carried and promoted on their services in Ireland, through their commitment to the self-regulatory European Code of Practice on Disinformation. Includes findings submitted by the BAI to the ERGA final report on the implementation of the CoP by platform signatories.
- [ElectCheck 2019](#), September 2019. Interim report on implementation of the EU CoP on disinformation, produced by the Institute for Future Media and Journalism, commissioned by the BAI

IT:

- [Report on online platforms](#) from the AGCOM Observatory on online platforms, AGCOM 2019.
- [Observatory on online publishing 2018 report](#), AGCOM April 2018. An economic analysis of the information sources operating exclusively on the net and their feedback from the public, a census of the same, as well as an assessment of the regulatory context in which they operate.
- [Report on online disinformation: special issue on coronavirus](#), AGCOM, April 2020.
- [Online disinformation monitoring system](#), AGCOM, July 2019. This is the most recent report from the Disinformation observatory on quality of information, aimed at detecting and contrasting pathological phenomena of online disinformation, published every 3 months.

LV:

- ['Latvian media plurality'](#), 2018. (in Latvian)

MK/HR/ME:

- [The role of structural pluralism in the Macedonian, Croatian and Montenegrin TV Sector](#), 2018. The analysis highlights that media pluralism is not clearly acknowledged in the legislation as a regulatory objective in the audiovisual field. The development of the audiovisual sector and the media pluralism, to date, did not take place strategically, and it was up to the regulator to implement their own strategic vision. Furthermore, the legacy

fragmentation of the market, the political and industrial pressure on the regulator had an effect on the aggravation of the overall media image.

NO:

- [Blindsoner og mangfold – en studie av journalistikken i lokale og regionale medier](#). Nord University. Orkana Akademisk. By Mathisen, B. R. & Morlandstø, L (2019). (in Norwegian)

Multi-country research:

- [Reuters Institute Digital News Report 2020](#). This year's report reveals new insights about digital news consumption based on a YouGov survey of over 80,000 online news consumers in 40 markets. The report looks at the impact of coronavirus on news consumption and on the economic prospects for publishers. It looks at progress on new paid online business models, trust and misinformation, partisanship and populism, and the popularity of curated editorial products like podcasts and email newsletters.
- Reuters Institute at the University of Oxford: "[Old, educated, and politically diverse: The audience of public service news](#)" (September 2019). Summary: Public service media are often widely used, highly trusted, and do not face the business pressures with which their private peers have to contend. But a closer look suggests that the challenges that face public service media news provision are bigger – much bigger – than is commonly acknowledged, even in countries with a long history of strong public service media. In this report we analyse survey data from a sample of eight countries to assess the reach of public service news. We find that the audience for public service news is old, educated, and politically diverse, and that public service media in many countries fall far short of the ambition to provide a near-universal news service, especially online. While they are among the most widely trusted news sources, they are often less trusted by people on the political right and people with populist attitudes. We document how, more than two decades into the move to a more digital, mobile, and platform-dominated media environment, public service media remain heavily reliant on declining offline broadcast channels in terms of audience reach, and that their online news offers in most cases deliver little additional reach because, although they are sometimes widely used, they mainly reach the same audience as broadcast news.

Non-country specific research:

- 'Protectionism vs. non-interventionism: Two approaches to media diversity in commercial terrestrial television regulation'. *Javnost-The Public*, 26(1), 70-88. By Ohlsson, J., & Sjøvaag, H. (2019).
- 'Distributed Readiness Citizenship: A Realistic, Normative Concept for Citizens' Public Connection'. *Communication Theory*. By Moe, H. (2019).
- 'Eventless news: Blindspots in journalism and the 'long tail' of news content'. *Journal of Applied Journalism & Media Studies*, 8(3), 291-310. Sjøvaag, H., & Kvalheim, N. (2019).
- 'Public Service Media, Diversity and Algorithmic Recommendation'. Sørensen, J. K. (2019).
- 'Media use in changing everyday life: How biographical disruption could destabilize media repertoires and public connection'. Ytre-Arne, B. (2019). *European Journal of Communication*, 34(5), 488-502.