



# 57<sup>th</sup> EPRA meeting

Oslo: 31 May – 2 June 2023

Plenary thematic session Media & information for the public good

*Public Service Media for the public good*

Introductory paper (Final post-meeting version)<sup>1</sup>

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*“Information is a public good. (...) Media companies cannot be treated as just another business. Their independence is essential. Europe needs a law that safeguards this independence.”*

This is the political commitment made by President von der Leyen two years ago<sup>2</sup> and the purpose of the upcoming European Media Freedom Act.

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<sup>1</sup> **Disclaimer:** this document has been produced for an internal meeting by EPRA, an informal network of 56 regulatory authorities in the field of audiovisual media services. It is not a fully comprehensive overview of the issues, nor does it represent the views or the official position of EPRA or of any member within the EPRA network.

## 1. A call for a public interest content framework

The recent crises and the stronger polarisation of our societies have emphasised the key role played by the media while exposing their vulnerability. On the one hand, the media, and in particular ‘public interest media’, are seen as crucial to keep the society informed and empower citizens to safeguard democracy and a healthy public debate. On the other hand, the rise of information disorders has destabilised the media, fuelling bashing campaigns to discredit professional media or the emergence of new laws threatening media freedom in the name of safer information landscapes. In parallel, the sustainability of traditional media outlets is jeopardized by the fast-evolving digital landscape, thus increasing risks of media capture. As stressed by Laura Becana Ball, *“independent journalism has become a luxury rather than a universal public good”*.<sup>3</sup>

In response to this challenging context, some experts call for a shift from the current individual right to freedom of expression framework to a public interest content framework that would aim at protecting media that serves public interest and the *“collective social benefit derived from independent journalism”*.<sup>4</sup>

*But what are public interest media?* The contextual, evolving and subjective nature of public interest makes it difficult to define.<sup>5</sup> A definition was suggested by James Dean<sup>6</sup>, from the International Fund for Public Interest Media. According to him, public interest media are free and independent, and their role is *“to inform people on the issues that shape their lives, in ways that serve the public’s rather any political, commercial or factional interest, to enable public debate and dialogue across society, and to hold those in power to account on behalf of the public interest”*.

Such a definition echoes the role and remit of public service media (PSM). Promoting the values of democratic societies<sup>7</sup> and ensuring that citizens have access to quality information and impartial media coverage<sup>8</sup> are indeed part of PSM’s mission as stated by European institutions.

## 2. A focus on public service media

When it comes to public interest content, public service media appear as a natural fit. PSM is usually seen as a *“fundamental agent in creating the informed and reasoning citizenry necessary for societal progress”* (Public Service Broadcasting, Hendy, 2013).

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<sup>2</sup> [2021 State of the Union address](#) by Ursula von der Leyen, President of the European Commission.

<sup>3</sup> From the Global Forum for Media Development. Contribution during the EPRA & Cullen International joint-event : [Media for good and for everyone \(2023\)](#).

<sup>4</sup> A New Paradigm for Global Journalism: Press Freedom and Public Interest, by Joel Simon, February 2023 – See also the [Report on the occasion of the 25th Anniversary of the Mandate of the OSCE Representative on Freedom of the Media](#) for the 25th anniversary of the mandate.

<sup>5</sup> Council of Europe, November 2020: [Prioritisation Uncovered: The Discoverability of Public Interest Content Online](#) by Eleonora Maria Mazzoli and Damian Tambini.

<sup>6</sup> Co-founder of and consultant to International Fund for Public Interest Media and Head of Policy, BBC Media Action.

<sup>7</sup> Council of Europe - [Recommendation](#) CM/Rec(2007)3 of the Committee of Ministers to member States on the remit of public service media in the information society.

<sup>8</sup> Recital 18, [Proposal for a regulation of the European Parliament and of the Council](#) establishing a common framework for media services in the internal market.

The year 2022 was the celebration of 100 years of PSM in Europe. Challenged by the successive emergence of colour television, cable and satellite, the end of public monopolies, the development of the DTT/DAB+ and lately, the disruptive revolution of Internet, the key role played by PSM in societies continues to be highlighted. It was for instance demonstrated that in countries with neither strong media brands nor independent and impartial public service media, the media ecosystem is more likely to fall prey to polarisation, escalating the trends to partisanship.<sup>9</sup>

Nevertheless, PSM have faced a contraction in financial resources in the last five years (*-4.4% since 2012 when taking inflation into account*)<sup>10</sup> and must respond to growing pressure to remain relevant and reach larger audiences.<sup>11</sup> Seen as one of the institutional protectors of independent and trustworthy journalism, there are signs showing that trust in PSM begins to fade.<sup>12</sup>

The 57<sup>th</sup> EPRA meeting is thus a timely opportunity to provide a forum to EPRA members to discuss the future of PSM and how media regulators can support their continued sustainability in the 21<sup>st</sup> century. The location of the 57<sup>th</sup> EPRA meeting in Norway, traditionally a stronghold for public service media, is also particularly appropriate for hosting such a debate.

### **3. PSM & EPRA: what has been discussed so far**

The issue of PSM has featured prominently on the agenda of many meetings ever since the establishment of the EPRA network in 1995.

Over time, the debates have covered a wide range of issues, encompassing governance and financing aspects, not to forget the role played by regulators in assessing PSM performance.

Recent sessions have focused on the **profound challenges faced by PSM in the digital age**.

In 2017, EPRA and EBU jointly organised a closed, small-scale workshop on "*The Future of Public Service Media – Successfully dealing with Disruption*", to facilitate the dialogue between PSM and broadcasting regulators on common goals and differing perceptions.

[EPRA's Work Programme for 2018](#) included an annual theme on "*Public service and public interest content in the digital age*", with a spring session focusing on current challenges in the provision, distribution and delivery of public service and public interest content and an autumn session on the role of regulators and on current experiences and best practices around issues of financing and investment in public interest content.

In 2020, EPRA organised a [webinar on European market trends in times of the Covid-19 crisis](#), which highlighted the crucial role played by PSM in that period and warned about future threats to PSM sustainability.

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<sup>9</sup> [The Illiberal Turn](#) – 56th EPRA meeting, [summary](#) of the plenary session on disinformation, plurality and trust.

<sup>10</sup> European Broadcasters Union (EBU), Report Funding of PSM, 2023.

<sup>11</sup> Mazzoli & Tambini (see above).

<sup>12</sup> International Association of Public Media Researchers (IAPMR), "Values and trust – A framework for evaluating and strengthening the trustworthiness of public service media journalism", Minna Horowitz & Alessandro D'Arma, 2023 – See also the [Reuters digital news report 2022](#): the level of trust in PSM is declining in most European countries (see [EPRA news](#)).

[EPRA's Work Programme for 2023](#) features the broad theme of *“media and information for the public good”* to call attention to the essential role of independent media to produce and disseminate content with high journalistic standards especially during times of crises. Envisaged outcomes for the year include looking into safeguards to protect independent, high-quality media - including PSM -, and to promote an enabling, sustainable environment, and discussing the role that media regulators can play to encourage PSM and public interest content. A first output was a public-facing event entitled *“Media for Good and for Everyone”* which was jointly organised with Cullen International on 29 March 2023 in Brussels and discussed how regulation can support strong and free media to serve the public interest.

#### **4. Public Service Media in 2023: mapping current challenges**

Public service media initially appeared in the late 1920s in Europe *“to promote social cohesion and gain back the trust of a public disenchanted with politics following World War I”*.<sup>13</sup> In Eastern Europe, PSM arrived later, replacing State-owned media during the post-soviet era.

At the time, spectrum scarcity, the high production costs and the market failure to produce public value content also provided strong rationale to establish PSM. In the 21<sup>st</sup> century, these grounds have lost some of their relevance and their role in nation-building and the question of their legitimacy happen to be contested in some parts of Europe.

The European PSM's postcard offers a very contrasted picture, presenting a wide range of structures, models and significant disparities in their reach, resources and impact.<sup>14</sup>

For instance, in some countries, a same public service media provider can offer different services in different media (IT, ES), while in some other countries, services will be provided by different legal entities (PL, SE, RO). In the Netherlands, different groups and associations have access to shared facilities and to broadcasting time across the channels. In Belgium, PSM only deliver services at regional level.<sup>15</sup> Various sources of income are observed as well - *licence fee from the audience, State grants, specific fund outside the State budget, advertising revenues, revenues from commercial services* -, licence fee and public funds being the main source.<sup>16</sup> Research has noted an increasing trend towards the replacement of the traditional licence fee with a general household fee or funding PSM from the national budget, with a risk of increasing dependence on political players.<sup>17</sup>

Notwithstanding these dissimilarities, PSM are expected to share common core values such as *“universality, independence, excellence, diversity, accountability and innovation”*.<sup>18</sup> In our modern global and interdependent societies, PSM inevitably face common challenges that might undermine

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<sup>13</sup> European Audiovisual Observatory: Iris Plus [“Governance and independence of public service media”](#), 2022.

<sup>14</sup> Radu R (2018) Europe's Public Service Media: Between Responsibility and Accountability – European Journalism Observatory - EJO. 21 March.

<sup>15</sup> EAO Iris Plus 2022 (see above).

<sup>16</sup> In 2020, 79,4% of all PSM funding in the EBU area was public while advertising represent 8,6% of total revenues. Source: EBU.

<sup>17</sup> See for instance EPRA paper [“Public Service and public interest in the digital age”](#) (2018).

<sup>18</sup> EBU's PSM common core values.

those values and their core mission. Indeed, they have to cope with growing pressure from the market, political bodies and from the audience that might jeopardise their independence and sustainability.

### ➤ **PSM & independence**

According to Minna Horowitz and Alessandro D'Arma, the role of PSM is to advocate for their public.<sup>19</sup> Such a mission cannot be fulfilled without independence, defined by the European Broadcasting Union as *“no undue interference by political or economic powers”* at the structural, supervisory, managerial and editorial level.

In 2018, the European Parliament expressed its concern about the growing threat to PSM's independence with regard to governments in some member States and called for adequate equipment, finance and safeguards<sup>20</sup>. Taking a step further, the European Commission, in the Article 5 of the proposed EMFA<sup>21</sup>, addresses the risk of State interference by requiring safeguards for the independent functioning of PSM providers. As early as 2012, the Council of Europe recommended *“a sustainable governance framework which secures both the necessary editorial independence and public accountability” of PSM.*<sup>22</sup>

PSM's independence is also threatened by their decreasing ability to compete in the digital landscape and the pressure to increase commercial collaborations. The disaggregation of the supply chain is likely to make them dependent on dominant online intermediaries, with a potential loss of control on the way the content is delivered and the editorial control over what is considered public interest content on their services.<sup>23</sup> In this regard, the project “PSM-AP: Public Service Media in the Age of Platforms” was recently launched under the CHANSE initiative<sup>24</sup> to understand *“the impact of the growth of global platforms on the social and cultural values underpinning PSM”* and therefore, on *“their organisational practices and cultural outputs”*.<sup>25</sup>

### ➤ **PSM & sustainability**

A survey that EPRA conducted among its members in 2018 on the biggest challenges PSM are facing, identified “stabilising or expanding reach” and “ensuring sufficient financial resources” as the most frequently mentioned issues.

PSM outlets still remain major players in the European audiovisual landscape, representing 29% of the sector's revenues.<sup>26</sup> However, the gap between European PSM and the top-10 tech giants

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<sup>19</sup> IAPMR, Horowitz & D'Arma, 2023 (see above).

<sup>20</sup> Committee on Civil Liberties, Justice and Home Affairs, [Report on media pluralism and media freedom in the European Union](#) 2017/2209(INI).

<sup>21</sup> [Proposal for a regulation of the European parliament and of the council](#) (European Media Freedom Act).

<sup>22</sup> [CoE recommendation on PSM governance in 2012](#).

<sup>23</sup> Mazzoli & Tambini (see above).

<sup>24</sup> [CHANSE](#), Collaboration of Humanities and Social Sciences in Europe, a joint initiative of 27 research funding organisations from 24 countries. More on [the PSM-AP project](#).

<sup>25</sup> EPRA is a supporting partner (participation in Advisory Committee and assistance with dissemination of results).

<sup>26</sup> EBU's PSM's competitive environment report, May 2022.

continues to grow (*from 2016 to 2020, the PSM revenues contracted by 1.2%, the revenues of top-10 giant increased by 98%*) while the financial resources of PSM tend to fade.<sup>27</sup>

Societal needs and expectations have changed and will keep changing with the coming generations. There are requests for new formats and genres (*gaming, podcasts...*) and new expectations (*involvement in climate change, willingness to see partial media coverage, disinterest in news...*).<sup>28</sup> Social media have become major gateways to media content and brands (*50% of 18-24s, and 47% of 25-34s, now use social media as their primary search engine when researching brands*)<sup>29</sup> while over 1 billion active users worldwide spend an average of 95 minutes per day on TikTok.<sup>30</sup> In addition, the market of subscription video on demand (SVOD) is largely dominated by US groups, representing 78% of the subscriptions in 2020.<sup>31</sup> In such an environment, PSM content can experience difficulty reaching some of its target audience (especially young people) and traditional competitors of PSM – European broadcasters – tend to become natural partners to tackle changes inflicted by tech and content giants. Against that background, rules on prominence and findability of content of general interest rules should not only apply in favour of PSM but also to relevant commercial offers.<sup>32</sup> To sum up the current situation, the journalists recently interviewed by IAPMR<sup>33</sup> identified three main challenges for PSM: political polarisation, competition in the attention economy and ‘platformisation’.

To fulfil their core mission, PSM need to find ways to reach all segments of the audience, gain visibility and trust, guarantee quality content and secure sufficient funding.

## 5. Aims and structure of the EPRA session

Mirroring the contrasted picture of PSM in Europe, the competencies and powers of audiovisual national regulatory authorities (NRAs) regarding PSM vary significantly across the old continent. An EPRA survey conducted in 2018<sup>34</sup> revealed these disparities: among the 32 respondents, one member had no competence for the regulation of PSM (DE), 14 were competent to implement legal provisions applicable to PSM but were not in charge of the assessment of PSM performance. 17 respondents had wide-ranging powers and played some role in the assessment of PSM performance.

This lack of homogeneity represents a challenge when it comes to address the question of regulators’ role in supporting PSM. Considering these circumstances, the session was devised in a way that will allow members to adjust the discussion to their particular remit and situation.

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<sup>27</sup> A five-year drop of 1.2% in PSM funding between 2016 and 2020. Source: EBU

<sup>28</sup> Source EBU and [Reuters digital news report 2021](#) – See also [EPRA news](#).

<sup>29</sup> Source: EBU.

<sup>30</sup> Source: KEPIOS.

<sup>31</sup> Source: European Audiovisual Observatory.

<sup>32</sup> Richard Burnley from the European Broadcasting Union. Contribution during the EPRA & Cullen International joint-event: [Media for good and for everyone \(2023\)](#).

<sup>33</sup> IAPMR, Horowitz & D’Arma, 2023 (see above).

<sup>34</sup> EPRA survey “[Public service and public interest content in the digital age: the role of regulators](#)”, 2018 - See also the related [comparative paper](#), 2019, Samuel Studer.

- The first part of the session will provide inspirational inputs and an illustration of the current situation faced by PSM from different backgrounds and setups.
- The second part of the plenary will give EPRA members the opportunity to openly discuss the role of regulators in an interactive and small-scale format (roundtable setting).

## 6. Summary of the session

### Part I: Public Service Media for the public good: inspirational keynote and case studies

- *Introductory remarks by Deniz Wagner<sup>35</sup>, Adviser to the OSCE RFoM: issuing a call for action for media regulators*

*What is the problem with freedom of expression online today?  
Why do we need a public interest framework for online media?  
Who can represent / defend the public interest?*

Media play a key role for our democracies. However, the state of play for media, and media freedom, is deteriorating across the globe, along with a backsliding of democracy, an increasing polarisation and a declining trust.

#### Why such a decline?

At the occasion of its [25<sup>th</sup> anniversary](#), the OSCE Representative on Freedom of the Media decided to gather experts and defenders of freedom of expression<sup>36</sup> to assess the work done over the last years and to understand how we reach the current situation. The major obstacle identified was the impact of false narratives and the instrumentalization of information. The sheer volume and fast spread made possible by digitalisation threaten the concept of “shared reality” (*a shared sense of truth*) and thus democracy.

In such a context, it is not enough to mitigate online harms. There is a need to ensure **an online information ecosystem that is beneficial to individuals’ human rights and collective democratic values and principles.**

Idea ≠ defining truth  
Idea = a public interest framework

<sup>35</sup> Teresa Ribeiro, OSCE RFoM, could unfortunately not attend the EPRA meeting and was replaced by Deniz Wagner.

<sup>36</sup> OSCE Advisory Group of Eminent Experts on Freedom of the Media: Yaman Akdeniz, Galina Arapova, Ingrid Brodnig, Miguel Maduro, Erica Marat, Mira Milosevic, Maria Ressa, Marietje Schaake, Joel Simon. Rapporteurs: Deniz Wagner, Ton Van den Brandt.

According to Joel Simon, “we need to superimpose a public interest framework, because the human rights-based framework is being undermined by platforms and weaponized by governments.”

#### What is a public interest framework and why?

Freedom of expression has become weaponised to undermine media and distort our shared reality and ability to make informed decisions. To respond to this alarming state of play, the OSCE RFoM calls for a **noise reduction** and **amplification of public interest content** approach.

Media need to be supported and linking media freedom to public interest allows for a protection “based not only on the individual right to free expression but also (or rather) on the collective social benefit derived from independent journalism”.

#### How do we define public interest content? Who can define public interest content?

The role of independent media regulatory authority is key, and it is crucial that regulators participate in the discussion to share their experience, expertise and knowledge.

Today, while a new regulatory framework has to be defined, there is an opportunity to ask ourselves ‘what do we want our media ecosystem to look like’?

The OSCE RFoM calls for a **renewal and adaptation of the existing approach** for protecting media and invites regulators to collectively imagine a new public interest framework to protect an “online information ecosystem that best serves the public interest”. Such a new “priorisation of content” framework should be done transparently, with media regulators and self-regulatory bodies, and independently from governments, to avoid any illegitimate threats to freedom of expression.

→ Read Deniz Wagner’s [address](#)

- **What opportunities and challenges do PSM face? Presentation of case studies by PSM representatives**

#### **Case study 1: Norsk rikskringkasting (NRK), the Norwegian Public Service Media**

→ [Presentation](#) by Vibeke Først Haugen, Director general of NRK



The role of PSM for the freedom of expression is fundamental for a functioning democracy and studies demonstrate a correlation between strong PSM and high levels of press freedom.<sup>37</sup> Currently in Norway, there is a high level of freedom of press indicators.

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<sup>37</sup> Press Freedom Index from Reporters Without Borders and the Democracy Index 2022 from The Economist.



### NRK in a nutshell:



#### NRK

- Limited Liability Company. The State owns 100 pct of shares
- The minister of Culture is the company's General Assembly
- Public Service Remit determined in the Articles of Association
- Editorial independent. DG is editor in Chief.  
The Board of the Company has no editorial role or power.
- Financed by grants over the State Budget (515 000 000Euro)
- 3 200 Employees

#### Services

- 3 TV channels, 13 Radio channels, TV-player and Radio-player
- Regional services
- nrk.no webpage with news and Public Service content.

\*97% of NRK's income comes from the State budget. Advertisement is prohibited on their services, but NRK is allowed to have sponsors for some content (e.g.: sport).

### Remaining sustainable:

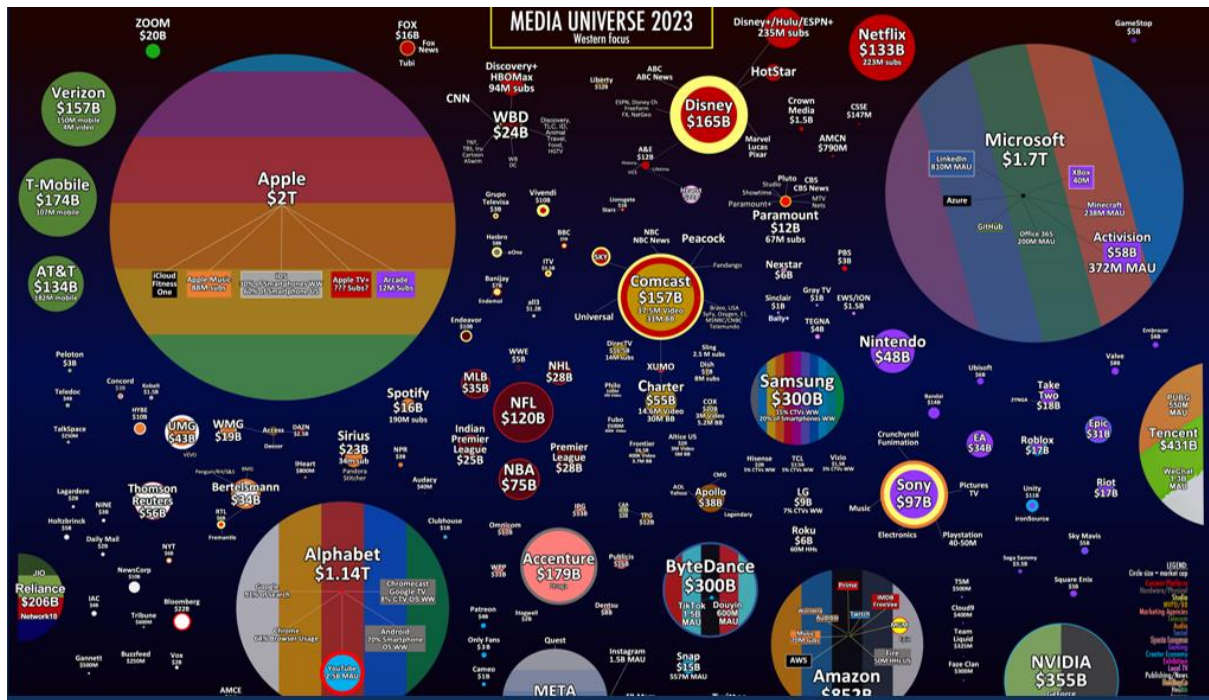
Fulfilling cultural and social needs is the core mission of PSM (see [Amsterdam Protocol](#)) and the main goal for NRK is to maintain a broad remit to dynamically develop new services to fit audience consumption habits. In this regard, the three pillars of NRK's strategy are: 1. strengthening and developing democracy, 2. enriching Norwegian and Sami language and culture, and 3. engaging with all.

Despite a high level of use, trust and satisfaction from the audience, NRK faces the challenge to reach younger generations, especially in such an uncertain future for the media. There is a high pressure from the market and increased competition for public time and attention.

NRK believes that, in a converging market, it is important to associate text, image and sounds and to have a strong online presence<sup>38</sup>. However, currently in Norway, the future of the VAT exemption in effect since 2016 for electronic news media affecting no less than 50% of audiovisual content is at stake and its withdrawal could weaken the PSM's position in the online media market.

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<sup>38</sup> Reports from the Norwegian NMA demonstrated that NRK's online presence has no negative impact on plurality (see [EPRA news](#)).



\*Source: [Evan Shapiro](#) (Size = the value // Colours = the type of services provided), Norwegian actors do not feature in the picture at all

To continue playing their democratic and fundamental role in such a challenging environment, PSM should benefit from the best possible starting position and this requires:

- **Stable and adequate funding.**
- **Flexible remit to allow innovation and ability to remain credible on the market.**
- **Independent editorial responsibility.**

NRK's current projects to remain an essential player:

- *"The Great Migration"* ([Den store folkevandringa](#)): a 7-month collective project with 68 newspapers, mostly local ones and journalists from NRK, to publish a series of stories about the migration flows that are changing Norway.
- *A joint verification project* to cover the Ukraine war and check the accuracy of photos and videos.

What NRK expects from regulation:

- NRK welcomes both DSA and DMA but would wish stronger regulation (for instance through EMFA) to prevent interference and protect the integrity of public interest content on international platforms.
- Awareness that being relevant and reaching all segments of all the society is a constant challenge that require a flexible remit.
- Safeguards for a strong independence and media freedom.
- Support to the sustainability, findability and availability of PSM online.

## **Case study 2 from Sakartvelos Sasogadoebriwi Mauzkebeli (GPB), the Georgian PSM**

→ [Presentation](#) by Tinatin Berdzenishvili, Director general of GPB

### GPB in a nutshell:



**A brief overview of GPB**

- **Our remit**
  - Inform
  - Educate
  - Entertain
- **Our offering**
  - 2 TV channels
  - 2 Radio channels
  - 1 Digital Native Brand - 1tv.ge
  - 6 Apps
  - 1 BVOD
  - A strong presence on Social Media
- **Our framework**
  - The public broadcaster helps people to understand each other and the world. Promotes Georgian society and culture.
  - Regulator: The Communications Commission
- **Funding (2022)**
  - Public funding: 25,532,933 EUR
  - Ads : 529,215 EUR
  - Other: 1,115,294 EUR
  - Per citizen: 5.64 EUR
- **Staff**
  - FTE: - 1.7% vs 2022
  - Average age: 45
  - Women: 41 %
  - Men: 59 %

Logos: SCENA, GEORGIA 360, 1TV.GE

\*The budget - €25 million – represents €5 per citizen and is constantly discussed.

### Focus on the situation in the region: from State broadcaster to Public Service Media

The biggest challenge is to raise the awareness about public service media and their role.

PSM in the region are relatively new (in the 90's) as they emerged with the end of the Soviet Union, until then media were identified as State broadcasters. It is thus a long way to make the opinion understand that PSM are a cornerstone of democracy, and their independence remains fragile.

### Creating a better environment for the new generation:

In the online environment, as there is no audience measurement or rating system like in the analogue world, it is challenging for PSM to remain visible. Nevertheless, having “good media” remains vital. The young generation is asking for diversity and values in media and PSM must be flexible to adapt to rapid change.

PSM need long-term sustainability, requiring:

- Stable governance<sup>39</sup>
- (Fair) elections of the Director general
- Editorial independence
- A sustainable development
- Appropriate legal framework

<sup>39</sup> Over the last 18 years, GPB had 12 Directors general, none of them completing a full mandate.

### GPB's strategy:

- 2017: Training of the staff to adopt "Constructive Journalism" to respond to the high level of polarisation and the critics faced by PSM in the region.
- 2018: A new business model was put in place, with the support of the national regulator ComCom, to significantly increase investment in Georgian and independent content productions.
- The [European Perspective project](#) from the European Broadcasting Union (EBU): GPB joined this pan-European networked newsroom currently including 18 organisations from 15 countries.
- Presence on significant online social platforms to follow the shift from the vertical linear broadcasting to the horizontal digital environment where the audience is at the centre.

### What GPB expects from regulation:

In the digital word, the winner is the one who owns the technology. Regulators have an important role to play to protect the **prominence of PSM content** in the online world – thus ensuring the continued sustainability of media for the public good.

#### ➤ **Panellist debate on key PSM questions:**

##### • **The role and importance of local news:**

For NRK (NO)	For GPB (GE)
<ul style="list-style-type: none"><li>- NRK is present in 15 places across the country and local news are a key part of the PSM's success.</li><li>- Local content and programmes related to Sami culture are very important for the audience.</li><li>- NRK collaborates with a lot of local newspapers to maintain a strong media diversity (cooperation on competence, cybersecurity).</li></ul>	<ul style="list-style-type: none"><li>- Various sources of local news: from local journalists but also from citizens through social media.</li><li>- GPB also tries to focus on minorities in its programmes (not attractive commercially but it still means a lot for some of the audience).</li></ul>

##### • **PSM's policy in terms of presence/visibility on very large platforms:**

For NRK (NO)	For GPB (GE)
<ul style="list-style-type: none"><li>- A strategic shift took place two years ago leading to closing most NRK's accounts on social media platforms to get back the control on content and reduce the presence on third-party platforms (<u>currently under test period</u>).</li><li>- Aim is to get the audience back on NRK's platforms and become more independent from the big platforms.</li></ul>	<ul style="list-style-type: none"><li>- Strategy: to embrace the whole audience and to reach everyone.</li><li>- No particular policy against very large platforms but it is a real challenge for PSM.</li></ul>

- **Financing issues: State funding vs. external sources**

For NRK (NO)	For GPB (GE)
<ul style="list-style-type: none"> <li>- The key need is independence.</li> <li>- It requires predictable funding and a flexible remit to be able to deliver on the various platforms which are necessary to reach and serve the audience.</li> </ul>	<ul style="list-style-type: none"> <li>- Discussing budget is different in the Eastern part of Europe.</li> <li>- The key issue is sustainability.</li> <li>- The licence fee system is ideal yet fragile. So far, the budget is automatically granted by the State, without any editorial control. Georgian PSM enjoys the best legal framework in the region at the moment.</li> </ul>

- **PSM's strategy towards children: following vs. nudging**

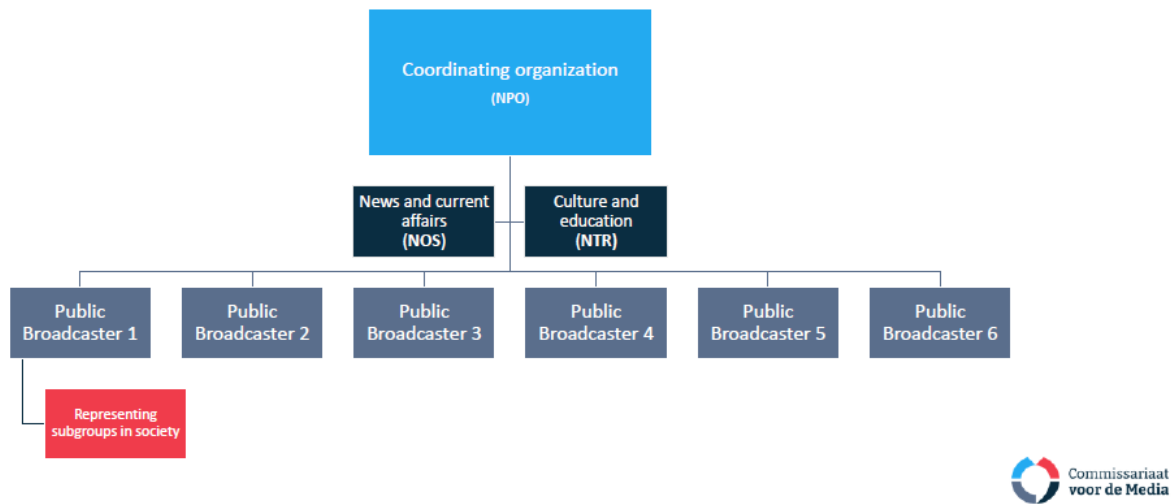
For NRK (NO)	For GPB (GE)
<ul style="list-style-type: none"> <li>- NRK relies on its experience and better understanding of Norwegian children to innovate and produce attractive high-quality content. The young generation turns their back to traditional communication channels earlier than before. There is a need to work differently and to be really good in innovation to get them back, without depending on big platforms.</li> <li>- NRK not allowed to use TikTok any longer.</li> <li>- Finding ways to adapt shall also go hand in hand with education and media literacy to push children towards more in-depth content and programme.</li> </ul>	<ul style="list-style-type: none"> <li>- During the pandemic, the audience turned to TV (new successful "school" channels were launched in Georgia). However, now, children mostly consume audiovisual content through smartphones and platforms.</li> <li>- GPB present on TikTok to serve 1,5 Mio viewers with better content.</li> <li>- GPB intends to go where children are to reach them (e.g.: launch of a VOD platform with a children section and media literacy gaming). The young generation is capable to be more focused on values and they are asking for trust. GPB tries to find the right formats to attract them.</li> </ul>

## Part II: roundtable discussion among EPRA members - How can regulators support PSM?

➤ [Presentation](#) by **Sara Blink** from the Commissariaat voor de Media (CvdM – NL)

The Dutch regulator has recently undertaken an in-depth review of the public service media system in the Netherlands with a view to encouraging the establishment of a future-proof system with a focus on sustainability.

# The Dutch PSM system



***The current system: A coordinating organisation and six appointed broadcasters with a public service remit***

Three fundamental changes occurred since the establishment of this very specific Dutch PSM system:

- Society: societal expectations have changed and the social groups and needs identified in the current remit are not relevant anymore.
- Technology: linearity and scarcity are not the rules anymore.
- Market: PSM have to compete with international players and an increasing number of providers, leading to a fight for attention and advertisers.

The current Dutch system – which focuses on organisation rather than public content for historical reasons - does no longer fit the audiovisual landscape and raises some challenges:

- *How can national PSMs reach/engage the (young) public?*
- *How can diverse producers make high-quality (journalistic) media offerings with public value?*
- *How can players in the system better be held accountable for the realization of the public media remit?*

In response, the CvdM set up a working group with experts to identify the present weaknesses, analyse the needs and suggest a new system for PSM. The work was articulated around two angles:

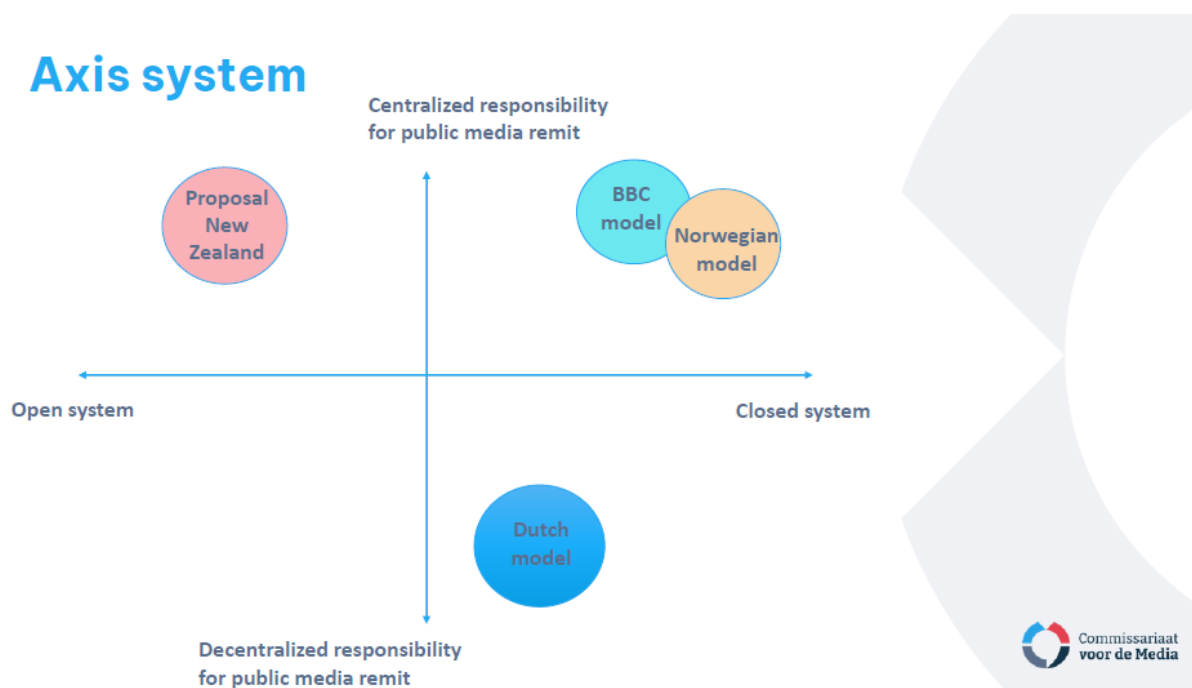
## 1. A reliable system - structural design requirements:

- Mechanisms for review and evaluation of players
- Guarantee of transparency and clear decision-making
- Clear roles and responsibilities
- A market accessible to diverse content creators

## 2. An efficient delivery of public media remit - key issues on the table:

- The societal connection: direct vs. indirect
- The responsibility for the public media remit: centralised vs. decentralised
- The public content's market accessibility for content makers: open vs. closed
- Profiling public media content: differentiated vs. uniform
- Distributing public media content: third party outlets vs. public outlets
- Funding public media content: long-term vs. project based.

A thinking tool, based on an analysis of different systems in the world (NL, NO, NZ, UK) was developed:



→ The aim is to provide a relevant and comprehensive analysis for the policy maker to establish a more suitable and robust PSM system in the Netherlands.



➤ **Roundtable discussions among EPRA members:**

Being mindful of the variety of regulatory powers in Europe regarding PSM, the aim of this second part was to give EPRA members the opportunity to exchange on what can be done in their country to support PSM at regulatory level.

As a first step, the EPRA delegates were grouped in tables of 8-10 persons (aiming for a wide variety in terms of regions, remits and hierarchy to better reflect the variety of national contexts and to allow the debate to embrace the different challenges faced) and given one out the following four questions to answer collectively with the help of a “table facilitator/host”.

- **What does independence of PSM look like and how can NRAs substantiate it?**
- **What questions should be addressed and what insight is needed to ensure a fact-based discussion about the role and constraints of PSM?**
- **How should PSM performance be measured and what kinds of problems do regulators have holding them to account?**
- **How are regulators working with their governments?**

As a second step, session Chair Mari Velsand invited all participants and table facilitators to enter their feedback to the questions on the Mentimeter App. She then presented the responses to the session key questions through an interactive Mentimeter session.

→ See the [results of the Mentimeter session](#)

**Key ideas emerging from the debate:**

**1. PSM & independence**

<b><i>What are the most important characteristics to define independent PSM?</i></b>	<b><i>What should government and/or NRAs do in the pursuit of independence?</i></b>
<ul style="list-style-type: none"><li>- Public funding /sustainability /predictable funding</li><li>- Legal framework and safeguards</li><li>- Editorial independence (from both political bodies and industry), professional integrity and high-quality standards</li><li>- Transparent procedures and accountability mechanisms (public trust)</li><li>- Independent and separate supervision</li></ul>	<ul style="list-style-type: none"><li>- Provide budget and sustainable preconditions for PSM -Multi-year financial trajectory</li><li>- Enforce proper fit-for purpose legal framework to guarantee both editorial and financial independence</li><li>- Ensure strong compliance and transparency obligations based on international standards and enforcement by NRAs</li><li>- Strengthen and guarantee the independence of NRAs</li><li>- Support NRAs and regulation</li></ul>



## 2. Supporting PSM

<b><i>What are the most important questions to be addressed to ensure a fact-based discussion about the role and constraints of PSM today?</i></b>	<b><i>What kind of insights need to be developed in this context?</i></b> <i>Data on/understanding of:</i>
<ul style="list-style-type: none"><li>- The financial sustainability</li><li>- Trustworthiness, transparency and reliable monitoring system</li><li>- Market position (competition): online presence, credibility on the market, relationship with other players</li><li>- Quality of content and programmes: plurality, diversity, inclusiveness, minorities representation</li><li>- Adaptation to audiences: consumption trends, attracting younger generation, cultural changes</li></ul>	<ul style="list-style-type: none"><li>- PSM financing scheme</li><li>- Level of trust</li><li>- Facts/evidence to demonstrate the need for a broad remit</li><li>- Level of transparency</li><li>- Audiences' expectations and consumptions (with focus on young)</li></ul>

## 3. Assessing PSM

***How should PSM performance be measured against their obligations in the digital age? Which criteria to assess?***

- Level of trust – per age group
- Universality and reach of audiences' capacity (investment in technology, online presence)
- Audience measurement and satisfaction, per age group
- Availability and accessibility
- Qualitative role of PSM (*inclusiveness, diversity, high-quality programmes, editorial independence*)

***What kind of problems do regulators experience when holding the PSM to account?***

- Unclear and outdated legal framework
- Lack of independence and effectiveness of regulation
- Lack of independence from political bodies and external factors

## 4. NRAs & Policy makers

***How are regulators working with their governments when new PSM legislation is required?***

*Various examples reported:*

- Cooperation on suggesting new measures to ensure PSM freedom
- Sharing of information, best practices and feedback on the enforcement of the legal framework
- Position papers and advisory role on political discussions and legislation
- No involvement of the NRAs when it comes to PSM policy

***What is working well concerning this cooperation?***

- Fruitful cooperation on topics regarding public interest and protection of minors
- Good working communication channels
- General reliance on the regulator's experience

***What should be different concerning this cooperation?***

- More institutionalised meetings
- More communication to be kept up-to date
- More independence
- Public interest should not be obscured by political agenda

## Annex: Selected bibliography

### Legal framework:

- **EMFA:** Proposal for a regulation of the European parliament and of the council establishing a common framework for media services in the internal market: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022PC0457>
- **The Amsterdam Protocol:** Protocol annexed to the Treaty of the European Community - Protocol on the system of public broadcasting in the Member States: [http://data.europa.eu/eli/treaty/ams/pro\\_9/sign](http://data.europa.eu/eli/treaty/ams/pro_9/sign)
- **Council of Europe's Recommendation** CM/Rec(2007)3 of the Committee of Ministers to member States on public service media governance: [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805d6bc5](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d6bc5)

### Reports and articles:

- European Audiovisual Observatory Iris Plus 2022, "[Governance and independence of public service media](#)" (see also [comparative PSM tables](#))
- European Audiovisual Observatory IRIS Special 2022-2: [Prominence of European works and of services of general interest](#)
- Centre for Media Pluralism and Media Freedom; CiTiP KU Leuven; IViR University of Amsterdam; Vrije Universiteit Brussels (for the European Commission): [Study on Media Plurality and Diversity Online](#) (2022)
- [A New Paradigm for Global Journalism: Press Freedom and Public Interest](#), by Joel Simon, February 2023
- [Can there be security without media freedom?](#) - Report on the occasion of the 25th Anniversary of the Mandate of the OSCE Representative on Freedom of the Media, November 2022
- Council of Europe, November 2020: [Prioritisation Uncovered: The Discoverability of Public Interest Content Online](#) by Eleonora Maria Mazzoli and Damian Tambini
- International Association of Public Media Researchers (IAPMR), "[Values and trust – A framework for evaluating and strengthening the trustworthiness of public service media journalism](#)", Minna Horowitz & Alessandro D'Arma, 2023

- [Europe's Public Service Media: Between Responsibility and Accountability](#) – Radu R (2018) European Journalism Observatory - EJO. 21 March
- Committee on Civil Liberties, Justice and Home Affairs, [Report on media pluralism and media freedom in the European Union](#) 2017/2209(INI)
- Organisational Culture of Public Service Media: People, Values and Processes (2015–2019) Project report by Michal Glowacki and Lizzie Jackson (2019) <https://www.creativemediaclusters.com/findings>

#### Research projects:

- **[The PSM-AP project](#)** from [CHANSE](#): The project will compare data gathered within and across six countries and 12 PSM organisations: Belgium (RTBF, VRT), Canada (CBC), Denmark (DR, TV 2), Italy (RAI), Poland (TVP), UK (BBC, Channel 4, S4C, ITV, Channel 5) to understand the impact of platformisation on PSM social and cultural values and on their organisational practices and cultural outputs.  
*Project Leader: Catherine Johnson, University of Huddersfield, Media and Performance, United Kingdom*  
[CHANSE](#) is a collaboration of Humanities and Social Sciences in Europe, a joint initiative of 27 research funding organisations from 24 countries.
- **[The illiberal turn project](#)**: a comparative study of news consumption and political attitudes in four CEE countries – the Czech Republic, Hungary, Poland and Serbia.  
*Principal investigator of the project: Václav Štětka* (see also the [56<sup>th</sup> EPRA meeting](#)).

#### Events:

- **EPRA/Cullen International joint event: [Media For Good and for Everyone](#)**, 29 March 2023: This full-day event analysed and discussed what are the preconditions to secure good financing, good visibility and good regulatory decisions with regards to quality media content. See the [summary of the event](#).

#### EPRA Material:

- [41<sup>st</sup> EPRA meeting](#), 2015 (Berne): Working group 1 “Public service content in a multiplatform environment: focus on remit & financing” – [Summary](#)
- [42<sup>nd</sup> EPRA meeting](#), 2015 (Nuremberg): Working group 1 “Public service content in a multiplatform environment: from must carry to must be found” - [Summary](#)
- [47<sup>th</sup> EPRA meeting](#), 2018 (Luxembourg): Plenary session “Public service and public interest in the digital age: taking stock of stakeholders’ views” - [Background document](#)
- [48<sup>th</sup> EPRA meeting](#), 2018 (Bratislava): Plenary session “Public service and public interest content in the digital age: the role of regulators” – [Introductory document](#)

- EPRA survey “[Public service and public interest content in the digital age: the role of regulators](#)”, 2018 - and the related [comparative paper](#), 2019, by Samuel Studer, OFCOM/BAKOM (CH)

#### Institutional websites:

- EBU: <https://www.ebu.ch/fr/home>  
*Focus on:*  
 EBU, [Report Funding of PSM](#), April 2023  
 EBU, [Report on PSM's competitive environment](#), May 2022
- Digital news report: <https://www.digitalnewsreport.org/>

#### Selected EPRA members' reports on PSM:

- [NRK's contribution to the Norwegian media diversity](#) by the Norwegian Media Authority (Nov 2021 - PDF) - detailed summary (EN)
- [Statement: Recommendations to Government on the Future of Public Service Media](#) by Ofcom (July 2021 - PDF - EN)
- [Small Screen: Big Debate – a five-year review of Public Service Broadcasting](#) (2014-18) by Ofcom (February 2020 – PDF \_EN)
- [Five-year Review of Public Funding: BAI Recommendations](#) (June 2018 - PDF - EN)