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Defining, promoting and safeguarding media pluralism in the digital age

Background Document[1]
Yerevan, 23 October 2025

'Media pluralism is an enduring normative principle for the fulfilment of fundamental rights and the functioning of contemporary democratic societies that requires as much protection in today's digital media systems as it used to in the traditional offline media environment'
EU Commission Study on media plurality and diversity online (2022)

Introduction

Media pluralism is one of four prioritised topics in EPRA's Work programme for 2025. During the consultation, members have expressed their wish to continue addressing this evergreen topic which has featured on EPRA's agenda over the years, thus ensuring a continuity with past sessions. This continued interest is likely to be a consequence of major legislative developments such as the European Media Freedom Act (EMFA), the core provisions of which entered into force on 8 August 2025, marking a milestone for media freedom in the EU and significantly increasing the tasks for media regulators and the European Board for Media Services. It also is a reflection on the advent of 'platformisation' and artificial intelligence and their combined impact on the values, operation and funding of the media sector. Finally, it reflects current societal concerns as media plurality is not an end in itself but a means to securing democratic discourse.

Media pluralism is a complex and evolving notion. As media ecosystems become increasingly digital, the interpretation of 'media pluralism' has evolved, taking into account new dimensions such as platform dominance, technological dependence, opinion power in the digital sphere, prominence of the content of public interest, and the fight against disinformation.[2] Reflecting the disruptive effects of the media's digital transformation, the study on media plurality and diversity online[3] identified five facets that go further than the traditional understanding of facilitating a diverse supply of media content:

- *Deliberative pluralism*: the variety of information, opinions and world views and the creation of public opinion that ultimately validates different perspectives on matters of public interests (political pluralism)
- *Representative pluralism*: the ability to reflect various social actors, groups, their needs and interests, and also fundamental views on social and political reality (diversity)
- *Internal pluralism:* the variety of content, viewpoints, social representations and experiences that are provided by a single media outlet
- *External pluralism*: the structure of the media market, including the diversity of media ownership, streams of funding (structural pluralism)
- *Exposure diversity*: the extent to which audiences are exposed to and find, discover, and consume, a diverse array of content (focus is on the receiving end/prominence of public interest content).

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[1] **Disclaimer: this document has been produced for an internal meeting by EPRA, an informal network of 56 regulatory authorities in the field of 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.**

[2] For further exploration of the definition of media pluralism, see: Elda Brogi, Some quick reflections on the conceptualisation of media freedom and media pluralism in the Rule of Law Report, in the European Media Freedom Act, in the Digital Services Act: https://cmpf.eui.eu/media-freedom-and-media-pluralism-conceptualized/

[3] Study on media plurality and diversity online – Final report, Publications Office of the European Union, 2022, https://data.europa.eu/doi/10.2759/529019

Past EPRA work on pluralism

Over the years, EPRA has explored several facets of pluralism and discussed the range of policy measures to secure media pluralism. The key themes covered during recent plenary sessions notably covered:

- [Media viability and transparency of media ownership](#) (2023)
- Public interest content - Public Service Media for the public good *(*2023 [See background paper](#))
- [Dis/misinformation, plurality and trust](#) (2022)
- New challenges to monitor pluralism and diversity Media in the age of algorithms (2020 - [podcasts](#) and in-depth [paper](#))
- The risks and opportunities of algorithmic content curation (2017 [See background paper).](#)
- How to measure and assess media pluralism and diversity of media content (2015 [See background paper](#).

Across these varied themes, the roles that media regulators play to promote and safeguard pluralism and the changing contextual factors impacting the understanding of plurality have been recurring leitmotivs in the discussions.

Session focus and aims

The current plenary session is a continuation of this approach. It will focus on what media pluralism really means in 2025 and the evolving challenges associated with it against the background of the shift of opinion power from traditional media outlets to platforms and the disruptive impact of artificial intelligence and machine learning based services and tools.

Digital platforms are exerting an increasing influence over public discourse, raising urgent questions about opinion power, transparency and democratic accountability.

At the same time, as artificial intelligence becomes deeply embedded in the media ecosystem - from content recommendation algorithms to automated journalism - it is reshaping how information is produced, distributed, and consumed. Acute concerns have recently surfaced regarding AI summaries[4] which have triggered lawsuits and regulatory complaints from publishers and content creators around the world.[5] News companies have been warned of a 'devastating impact' on online audiences as search results are replaced by AI summaries, after a recent study by Authoritas claimed it caused up to 80% fewer clickthroughs.[6] AI Overviews have been getting heat in the context of the European Democracy Shield as well lately, with EU countries increasingly worried about their impact on media pluralism.

The Draft Guidance Note of the Council of Europe[7] on the Implications of Generative Artificial Intelligence for Freedom of Expression also refers to the structural implications of generative AI on media and informational pluralism and points that: '*The design and content moderation of Generative AI applications therefore have a direct impact on the visibility and viability of journalism and its societal role, especially when sources are disassociated or misattributed, and when media organisations are not fairly compensated for their content being used to train or adapt these models'*.

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[4] E.g. AI Overviews, an AI feature integrated into Google Search that produces AI-generated summaries of search results
[5] https://www.techpolicy.press/why-lawsuits-over-ai-summaries-will-fail/
[6] https://www.theguardian.com/technology/2025/jul/24/ai-summaries-causing-devastating-drop-in-online-news-audiences-study-finds
[7] https://rm.coe.int/msi-ai-2025-10-draft-guidance-note-on-the-implications-of-generative-a/1680b68c48

Against that background, the session will:

- *explore the evolving interplay between platform governance, AI technologies, and media pluralism*
- *examine both the opportunities AI offers for amplifying diverse voices and the risks it poses through algorithmic bias, concentration of power, and reduced editorial transparency*
- *provide an opportunity for EPRA members to discuss their respective approaches to media pluralism, the challenges that they face and potential responses*
- *initiate a timely conversation on the effectiveness of current policy measures for securing pluralism and whether they are at risk of 'policy drift' as they may no longer adequately apply to changing conditions.*

Session format

Board Sponsor: **Stanislav Matějka** - EPRA Senior Vice-Chair
Content producers: **Sela Kooter**, CvdM (NL), **Calum Fabb**, Coimisiún na Meán (IE)

- The session will start with a **keynote** by **Theresa Josephine Seipp**, Postdoctoral researcher, at the Institute for Information Law in Amsterdam (IViR) and part of the research team at the AI, Media & Democracy Lab, setting the conceptual stage and framing the dual impact of platform dynamics and AI on pluralism.

  Theresa's research focuses on the governance and regulation of (concentrated) opinion power, the interdependence between media and Big Tech, and the integration of AI into journalism, with a specific focus on small local media. In her PhD research, she investigated regulatory approaches to address the growing opinion power of platforms and the threats to media freedom and pluralism posed by an increasingly concentrated digital media ecosystem.

- Theresa will then join a **panel discussion** with **Ali-Abbas Ali**, who leads Ofcom's work on Media Plurality and Competition, and **Sela Kooter**, International Policy Advisor at the Dutch Media Authority CvdM. Each panellist will offer a short individual reflection before engaging in a roundtable discussion moderated by EPRA Senior Vice-Chair **Stanislav Matějka**. To ensure a dynamic and responsive dialogue, the session includes live polling and audience interaction via Menti.

- EPRA delegates will then have an opportunity to discuss in a **facilitated roundtable format** their respective approaches to media pluralism, the challenges that they face and potential solutions to identified issues.

Annex 1: A selection of relevant recent resources

The UN's joint declaration on media freedom and democracy (2023), at: https://www.article19.org/wp-content/uploads/2023/05/2023-Joint-Declaration-on-Media-Freedom-and-Democracy.pdf

Council of Europe (2018) Recommendation CM/Rec (2018)1 on media pluralism and transparency of media ownership, 7 March 2018, at: https://rm.coe.int/1680790e13
accessed on October 9, 2025.

Mazzoli, E., & Tambini, D. (2020). *Prioritisation uncovered. The Discoverability of Public Interest Content Online*. Council of Europe. https://edoc.coe.int/en/internet/11681-prioritisation-uncovered-the-discoverability-of-public-interest-content-online.html

OSCE Representative on Freedom of the Media: report "Can there be security without media freedom?", November 2022: https://www.osce.org/files/f/documents/8/d/530239.pdf

European Commission (2022): Centre on Media Pluralism and Media Freedom (CMPF), CiTiP of KU Leuven, Institute for Information Law of the University of Amsterdam (IViR/UvA), Vrije Universiteit Brussels (Studies in Media Innovation and Technology VUB- SMIT), Parcu, P. L., Brogi, E., Verza, S., Da Costa Leite Borges, D., Carlini, R., Trevisan, M., Tambini, D., Mazzoli, E. M., Klimkiewicz, B., Broughton Micova, S., Petković, B., Rossi, M. A., Stasi, M. L., Valcke, P., Lambrecht, I., Irion, K., Fahy, R., Idiz, D., Meiring, A., Seipp, T., Poort, J., Ranaivoson, H., Afilipoaie, A.Domazetovikj, N., *Study on media plurality and diversity online – Final report*, Publications Office of the European Union, 2022, https://data.europa.eu/doi/10.2759/529019

The EUI Centre for Media Pluralism and Media Freedom's Media Pluralism Monitor (MPM) general report for 2025, available at: https://cadmus.eui.eu/entities/publication/15a6ae3c-f325-4435-a6a9-54687d595b85

ERGA Report: Internal Media Plurality in Audiovisual Media Services in the EU: Rules & Practices (2018), available at:
https://media-board.europa.eu/document/download/7993dcda-a738-4e16-ba8e-f6cc2b777d8e_en?filename=ERGA%20SG1%20%E2%80%93%20Report%20on%20internal%20plurality%20%E2%80%93%20Deliverable%20%282018%29.pdf

Media Board's Terms of Reference for WG2 Pluralism and media Markets, available at: https://media-board.europa.eu/document/download/fa55e6c4-994d-4573-a7d4-ef996954f2a2_en?filename=WG2%20Pluralism%20and%20media%20markets%20%28Terms%20of%20Reference%29.pdf

Media Board's position paper on the European Commission's Public Consultation on Article 18 of the European Media Freedom Act (2025), available at:
https://media-board.europa.eu/document/download/020e0aef-e8f5-44b9-b8ef-e48da0705f5f_en?filename=Position%20of%20the%20Media%20Board%20on%20the%20consultation%20on%20Article%2018%20of%20the%20EMFA.pdf

EPRA Survey | Media Pluralism | Summary of responses

Respondents

- AMA – Albania
- VRM – Belgium (Flanders)
- Medienrat – Belgium (German-speaking community)
- CSA – Belgium (Wallonia)
- CEM – Bulgaria
- RTDSA – Cyprus
- ComCom – Georgia
- NCRT – Greece
- NMHH – Hungary
- IMC – Iceland
- AGCOM – Italy
- NEPLP – Latvia
- BA – Malta
- CA – Moldova
- AVMU – North Macedonia
- NMA – Norway
- ERC – Portugal
- AKOS – Slovenia
- CNMC – Spain
- Memy – Sweden
- OFCOM – Switzerland
- Ofcom – UK
- NCTRB – Ukraine

Q1: Do you have a definition, in policy or legislation, of media pluralism?

- 4 of 23 respondents have a legal definition of media pluralism (Italy, Norway, Belgium (Wallonia), and Moldova)
- Most respondents refer to governing principles or general law guiding the interpretation and application of "pluralism" in practice, including:
  - Pluralistic offering (at market-level, on a national basis)
  - Autonomy and transparency in ownership
  - Impartiality, including in the production of news and current affairs content
  - Competitive landscape
  - Cultural expression

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[8] https://www.epra.org/surveys/understanding-the-role-of-other-nras-in-promoting-and-safeguarding-media-plurality-in-their-country/results.pdf (members' only document)

- o   Access to and range of public views
- o   Public interest
- o   Innovation and technological development
- Many respondents refer to external and internal dimensions of pluralism, and frequently refer to making services available and ensuring that content is reflective of a variety of voices
- 7 of 23 respondents refer to constitutional or general law as the basis for their action in relation to promoting and supporting media pluralism in their jurisdiction (Switzerland, Albania, Slovenia, Ukraine, Belgium (German-speaking community), Portugal, and Sweden)
- Some respondents remarked having no specific legislative provisions relating to media pluralism

Q2: The role of NRAs in ensuring media pluralism

- 15 of 23 respondents identified the assessment of media market concentrations as a significant role of their NRA in ensuring media pluralism (Belgium (Wallonia), Albania, Spain, Belgium (Flanders), United Kingdom, Ukraine, Belgium (German-speaking community), Norway, Sweden, Cyprus, Italy, North Macedonia, Moldova, Portugal, and Iceland)
- 2 of 23 respondents identified collaborating with the competition authority on the assessment of media market concentrations (Norway and Iceland)
- Most respondents focus on broadcasting as the core of their remit, including significant discussion on the role of licensing
    - o   Only some respondents referred to pluralism protections extending to press or print media, or online platforms
    - o   One respondent indicated that the abandonment of licensing processes in the jurisdiction led to a proliferation of new services being available
- Some respondents indicated having a lack of statutory powers relating to media pluralism

Q3: The tasks of NRAs in supporting media pluralism

- 7 of 23 respondents identified having measurement frameworks or relevant research for media pluralism in place (United Kingdom, Italy, North Macedonia, Bulgaria, Latvia, Portugal, and Norway), including:
    - o   assessing diversity of voices and opinions available in content;
    - o   assessing the access to and use of media, and the impact of media on public opinion;
    - o   measuring concentration in the market; and
    - o   particular focus on diversity of outputs on public service media.
- Some of those respondents noted a predominant focus on broadcasting services where measuring media pluralism.
- Some of those respondents include press and print publishers in their measurement frameworks for media pluralism.
- A minority of respondents operate funding or other supports for the media sector.

Q4: Recent developments in other jurisdictions

Some developments that have occurred in other jurisdictions of relevance include:

- The development of funding schemes for journalism;
- The capacity for new designations of media service providers, including:
    - o   The designation and regulation of vloggers, and
    - o   The capacity to designate certain media service providers as having "significant market power".
- The development of new measurement frameworks or new research for media pluralism, including:
    - o   Accounting for online intermediaries and the content creator economy;
    - o   Accounting for journalistic standards and editorial independence;
    - o   Accounting for social and cultural inclusion;
    - o   Accounting for diversity of exposure to content, as well as levels of access;
    - o   Measuring political pluralism in media, including across online platforms;
- The development of strategies covering media literacy and user education, including educating people on the value of media pluralism.