



30th EPRA Meeting, Dresden, 15 October 2009
Working Group III: The European Media Pluralism Monitor
Introduction & Objectives
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Introduction

Media pluralism has been a recurrent theme at EPRA meetings. Both in 2000 (Paris) and 2002 (Ljubljana), the topic of media concentration and pluralism has been addressed in working groups. A 2nd plenary session in 2004 (Istanbul) was dedicated to the issue of "Media concentration: Current Developments and Regulatory Challenges"; on that occasion Deirdre Kevin presented her EIM report on media ownership in 25 Member States¹, while Sigve Gramstad from Norway focused on the regulatory challenges of transnational concentration. Recently, in 2007 (Prague) Quint Kik from CvdM reported on five years of research on the Dutch market in a working group, in which also Sebastiano Sortino from AGCOM and Bernard Celli from the French CSA presented.

The issue of **monitoring** (which methodology, on a national or European-wide scale, etc.) was frequently discussed on these occasions, and is clearly a topic which is also on the agendas of the Council of Europe and the European Commission. In November 2008, the Group of Specialists on Media Diversity (MC-S-MD) issued a report on "A *Methodology for monitoring media concentration and media content diversity*".² In January of the preceding year, the European Commission – as a response to continuing political concerns – launched its three-step approach for advancing the debate on media pluralism within the European Union; monitoring and enhancing transparency are considered as key elements in that process.³ The first step was the publication of a Commission Staff Working Paper,⁴ followed by an *Independent Study on Indicators for Media Pluralism in the Member States – Towards a Risk-Based Approach*. The third step that was initially envisaged would be a Communication presenting relevant indicators for assessing media pluralism in the EU Member States, as developed throughout the study, but this step will now be for consideration by the next Commission in 2010.

In the meantime, it seems interesting to take a closer look at the outcome of the study and discuss the strengths and weaknesses of the **Media Pluralism Monitor** that was developed by the study team and presented in its preliminary form at a stakeholder workshop in Brussels on 8th June 2009. The public workshop showed that stakeholders are split on the benefits of a tool to monitor and assess the level of media pluralism in the Member States. Reactions and feedback have been gathered by the study team and integrated in the final version of the report.

In order to have a better understanding of the potential (and limits) of the tool, and how it could support the national media regulators in the implementation of media pluralism policies, EPRA members will have a chance to discuss the general methodology as well as individual indicators during this working group. First, the monitor will be presented by the project leader, Prof. Dr. Peggy Valcke of K.U. Leuven, after which Maja Cappello of AGCOM will comment on preliminary results of a first test of the monitor in Italy.

The following paragraphs provide a summary of the main characteristics of the Media Pluralism Monitor – the full text reports are available for download from the Commission's website.⁵

Media Pluralism Monitor

The Media Pluralism Monitor has been developed in the context of the *Independent Study on Indicators for Media Pluralism – Towards a Risk-Based Approach*, commissioned by the DG Information Society and Media of the European Commission. The study ran from January 2008 until July 2009 and was carried out by a consortium of three academic institutions (Katholieke Universiteit Leuven – ICRI, Central European University Budapest – CMCS, Jönköping International Business School – MMTC) and a consultancy firm (Ernst & Young Consultancy Belgium), in cooperation with subcontractors from all EU Member States. The objective of the study was to develop a practicable monitoring tool for assessing media pluralism in the EU Member States and

¹ http://www.epra.org/content/english/members/working_papers/Istanbul/European%20Citizen%20Information%20Project%20Final%20REPORT.pdf

² [http://www.coe.int/t/dghl/standardsetting/media/Doc/H-Inf\(2009\)9_en.pdf](http://www.coe.int/t/dghl/standardsetting/media/Doc/H-Inf(2009)9_en.pdf)

³ http://ec.europa.eu/information_society/media_taskforce/pluralism/index_en.htm

⁴ http://ec.europa.eu/information_society/media_taskforce/doc/pluralism/media_pluralism_swp_en.pdf

⁵ http://ec.europa.eu/information_society/media_taskforce/pluralism/study/index_en.htm

identifying threats to such pluralism based on a set of common indicators, covering pertinent legal, economic and socio-cultural considerations.

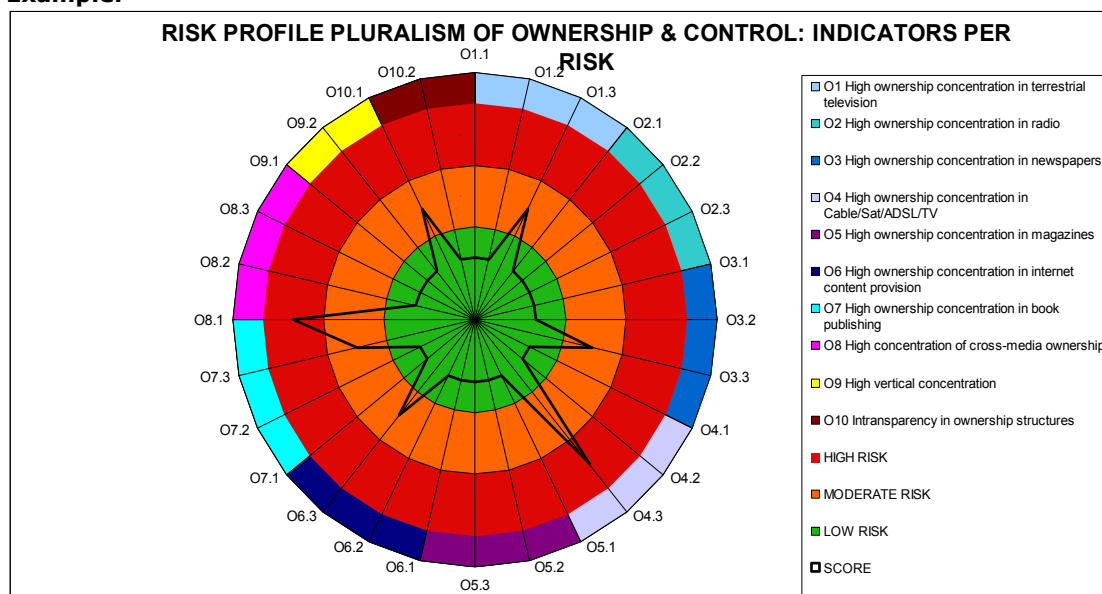
The Media Pluralism Monitor combines indicators – 166 in total – drawn from law (L), economics (E) and social science (S), matched to different risks in a number of risk domains. Each risk domain corresponds with a specific dimension of media pluralism: pluralism of media ownership (O), of media types and genres (T), cultural pluralism (C), political pluralism (P) and geographical pluralism (G) in the media. An additional risk domain looks at basic (legal) safeguards for the media sector (B), such as the protection of free speech, independent supervision and media literacy. The indicators cover the various stages of the media value chain: supply (S), distribution (D) and use (U) (called “risk areas”). A list of the indicators can be found in the annex below.

Following the instructions in a comprehensive User Guide, users will gather the requested data to calculate the scores for each indicator and fill out the obtained scores in a user-friendly spread sheet. Depending on the applicable border values defined by the research team, the result will fall into either the “red”, “orange” or “green zone”. Each colour indicates a particular level of risk:

- **Red - high risk:** Threats to media pluralism occur and immediate actions or measures are required in the short term.
- **Orange - moderate risk:** Immediate follow-up is necessary, actions or measures are possibly required, depending on the range between the orange and the red zone.
- **Green - low risk:** Safe zone, no immediate follow-up is required, no immediate actions are required.

The user will have to interpret these risk profiles at the end of the monitoring exercise (*infra*) in order to set priorities and formulate suggestions for actions plans and possible remedies.

Example:



Hence, the monitor adopts a novel, multi-disciplinary approach – much wider than merely examining the ownership of the media – which is especially adapted to the structural transformations that the media are currently undergoing as a result of new technologies and convergence. It should be stressed that the Media Pluralism Monitor offers **a diagnostic, but not a prescriptive tool** on the basis of established risk management strategies. Its purpose is to facilitate the collection of empirical data on various risks for media pluralism given the particular economic, socio-demographic and legal situation in each Member State. The Monitor, however, does **not** prescribe specific remedies or actions for particular risk profiles. **Thus, while it urges the application of the same analytical framework in all Member States to ensure comparability of the results obtained, it is not a call for harmonisation of policies in this area.** Given the far-reaching socio-cultural, economic and political importance of the media for the functioning of European democracies, the sensitive matter of how to protect media pluralism is

ultimately left to the discretion of Member States and their authorities who, in defining their nation's risk appetite, are free to consider market-based, as well as regulatory, approaches to diversity.

The monitor is open for use by a wide range of stakeholders, including not only regulators or ministries, but also NGOs, parliamentary committees, academic scholars, civil society organisations, etc. It can, however, be expected that national media regulators would play a pivotal role in the implementation process. It is recommended that implementation is done in a transparent manner, with the involvement of various stakeholders, and that results are publicly shared. This is important in the light of the interpretation phase that necessarily follows the stages of data collection and scoring of the indicators. Results will have to be interpreted with caution and scores for individual indicators need to be assessed in the light of, on the one hand, the scores relating to the other indicators and, on the other hand, national specificities in relation to the media market, the demographic situation and political culture. Hence, while the Media Pluralism Monitor applies the same set of indicators and border values for all EU Member States, it is at the same time designed to accommodate the diverging profiles of media landscapes throughout the EU. It does so by providing scope to consider differences in market size, media development, cultural and regulatory traditions, etc., when interpreting results. Through the inclusion of a function, called "ex ante profiling", it also takes into account the impact that underlying realities such as population size and average income levels have on the level of media pluralism sustainable by commercial means. This allows the user (optionally) to change the default profile "large population and high GDP/capita" in the beginning of the scoring exercise, resulting in an automatic adjustment of border values for a number of indicators.

Concluding Remarks

While the Media Pluralism Monitor received harsh criticisms at the stakeholder workshop in Brussels, it was also praised for its comprehensiveness and robustness. Indeed, by bringing together a host of previously disparate concerns to offer a multi-faceted approach to media pluralism, the Monitor may effectively provide decision-makers both in policy and in industry with the means to develop a wider and stronger evidentiary basis for defining priorities and actions in the area of media pluralism.

During the working group, the following questions may be discussed:

- What will be the advantages and drawbacks of having a common set of indicators to assess media pluralism in the EU Member States?**
- Are national specificities sufficiently taken into account? Does the current prototype strike the right balance between uniformity and comparability on the one hand, and local characteristics on the other hand?**
- Could the Media Pluralism Monitor also be easily implemented in the countries of non-EU EPRA members? Are there any indicators which would prove problematic in that regard?**
- Do the media regulators already have the necessary tools to implement the Media Pluralism Monitor? Which data, expertise is missing? Is it feasible to create such data, expertise at a reasonable cost?**
- Which cooperation forms can be envisaged?**

Peggy Valcke
24 September 2009

Annex: Overview of risk domains and indicators

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
1	B1.1	B1 Freedom of speech and related rights and freedoms are not sufficiently protected	L	S	Regulatory safeguards for freedom of expression
2	B1.2	B1 Freedom of speech and related rights and freedoms are not sufficiently protected	L	S	Regulatory safeguards for right to information
3	B1.3	B1 Freedom of speech and related rights and freedoms are not sufficiently protected	L	S	Recognition of media pluralism as intrinsic part of media freedoms and/or as policy objective of media legislation and/or regulation
4	B1.4	B1 Freedom of speech and related rights and freedoms are not sufficiently protected	L	S	Regulatory safeguards for journalistic practice
5	B1.5	B1 Freedom of speech and related rights and freedoms are not sufficiently protected	L	S	Regulatory safeguards for the protection of journalistic sources
6	B1.6	B1 Freedom of speech and related rights and freedoms are not sufficiently protected	L	S	Regulatory safeguards for journalists' access to events for news reporting
7	B2.1	B2 Insufficiently independent supervision in media sector	L	S	Regulatory safeguards for the independence and efficiency of the media authority (authorities)
8	B2.2	B2 Insufficiently independent supervision in media sector	L	S	Regulatory safeguards for the independence and efficiency of a self-regulatory body in the press sector
9	B2.3	B2 Insufficiently independent supervision in media sector	L	S	Regulatory safeguards for the independence and efficiency of the competition authority
10	B2.4	B2 Insufficiently independent supervision in media sector	L	S	Regulatory safeguards for the independence and efficiency of the telecommunications authority
11	B3.1	B3 Insufficient media (including digital) literacy	L	U	Policies and support measures for media literacy (or digital literacy in particular) among different groups of population

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
12	C1.1	C1 Insufficient media representation of European cultures	S	S	Proportion of European works in television broadcasting (linear AVMS)
13	C1.2	C1 Insufficient media representation of European cultures	L	S	Regulatory safeguards for European works in television broadcasting (linear AVMS)
14	C1.3	C1 Insufficient media representation of European cultures	S	S	Proportion of European works in non-linear AVMS
15	C1.4	C1 Insufficient media representation of European cultures	L	S	Regulatory safeguards for European works in non-linear AVMS
16	C1.5	C1 Insufficient media representation of European cultures	S	S	Regulatory safeguards for European works in non-linear AVMS Proportion of non-domestic European works in television broadcasting (linear AVMS)
17	C1.6	C1 Insufficient media representation of European cultures	S	S	Proportion of non-domestic European works in top TV programmes in linear AVMS
18	C1.7	C1 Insufficient media representation of European cultures	S	S	Proportion of TV coverage focusing on non-domestic European issues in TV news on linear AVMS
19	C1.8	C1 Insufficient media representation of European cultures	S	S	Proportion of coverage focusing on non-domestic European issues in quality daily newspapers
20	C2.1	C2 Insufficient media representation of national culture	S	S	Proportion of national works in television broadcasting (linear AVMS)
21	C2.2	C2 Insufficient media representation of national culture	S	S	Proportion of national works in top TV programmes in linear AVMS
22	C2.3	C2 Insufficient media representation of national culture	L	S	Regulatory safeguards for national works in television broadcasting

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
23	C2.4	C2 Insufficient media representation of national culture	L	S	Regulatory safeguards for national music in radio broadcasting
24	C2.5	C2 Insufficient media representation of national culture	L	S	Policies and support measures for the promotion of national works apart from general PSM funding)
25	C3.1	C3 Insufficient proportion of independent production	S	S	Proportion of European works by independent producers in television broadcasting (linear AVMS)
26	C3.2	C3 Insufficient proportion of independent production	S	S	Proportion of European works by independent producers among top TV programmes in linear AVMS
27	C3.3	C3 Insufficient proportion of independent production	L	S	Regulatory safeguards for European works by independent producers in television broadcasting (linear AVMS)
28	C4.1	C4 Insufficient proportion of in-house production	S	S	Proportion of in-house production in television broadcasting (linear AVMS)
29	C4.2	C4 Insufficient proportion of in-house production	S	S	Proportion of in-house production in top 10 TV programmes in linear AVMS
30	C5.1	C5 Insufficient representation of world cultures	S	S	Proportion of non-European and non-US production in television broadcasting (linear AVMS)
31	C5.2	C5 Insufficient representation of world cultures	S	S	Proportion of TV coverage focusing on non-European and non-US regions in TV news on linear AVMS
32	C5.3	C5 Insufficient representation of world cultures	S	S	Proportion of coverage focusing on non-European and non-US regions in quality daily newspapers
33	C6.1	C6 Insufficient representation of the various cultural and social groups in mainstream media content and services	S	S	Proportion of actors representing different cultural and social groups in selected national newspapers, TV, radio programmes and internet services (news contents).
34	C6.2	C6 Insufficient representation of the various cultural and social groups in mainstream media content and services	S	S	Representation of minorities on the TV screen and in news rooms
35	C6.3	C6 Insufficient representation of the various cultural and social groups in mainstream media content and services	L	S	Policies and support measures for the promotion of cultural diversity in media (apart from general PSM funding)

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
36	C7.1	C7 Insufficient representation of the various cultural and social groups in PSM	S	S	Availability and proportion of programming provided for cultural and social minority groups on PSM channels and services
37	C7.2	C7 Insufficient representation of the various cultural and social groups in PSM	S	S	Availability of media content in minority languages on PSM channels and services
38	C7.3	C7 Insufficient representation of the various cultural and social groups in PSM	L	S	Regulatory safeguards for access to airtime on PSM by the various cultural and social groups
39	C8.1	C8 Insufficient system of minority and community media	E	S	Ratio of terrestrial TV channels dedicated to ethnic/linguistic/national minorities to total number of domestic terrestrial TV channels
40	C8.2	C8 Insufficient system of minority and community media	E	S	Ratio of TV/Cable/Sat/ADSL television channels dedicated to ethnic/linguistic/national minorities to total number of domestic TV/Cable/Sat/ADSL television channels
41	C8.3	C8 Insufficient system of minority and community media	E	S	Ratio of radio channels dedicated to ethnic/linguistic/national minorities to total number of domestic radio channels
42	C8.4	C8 Insufficient system of minority and community media	E	S	Ratio of newspapers dedicated to ethnic/linguistic/national minorities to total number of domestic newspapers
43	C8.5	C8 Insufficient system of minority and community media	E	S	Ratio of number of magazines dedicated to ethnic/linguistic/national minorities compared to total number of domestic magazines
44	C8.6	C8 Insufficient system of minority and community media	E	S	Parity of financing of secondary linguistic media compared to population size
45	C8.7	C8 Insufficient system of minority and community media	S	D	Number, estimated reach and existence of (other) community media outlets serving different communities and minority groups
46	C8.8	C8 Insufficient system of minority and community media	S	S	Sustainability of investment and proportion of subsidies in minority and community media
47	C8.9	C8 Insufficient system of minority and community media	S	D	Access of minority and community media to networks and platforms
48	C8.10	C8 Insufficient system of minority and community media	L	S	Regulatory safeguards for minority and community media

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
49	C9.1	C9 Insufficient representation of different cultural and social groups in HR in the media sector	S	S	Proportion of journalists and media executives from different cultural and social groups (including ethnic/linguistic/national minorities, women and disabled people) in PSM
50	C9.2	C9 Insufficient representation of different cultural and social groups in HR in the media sector	S	S	Availability of diversity measures within media companies (such as a diversity officer, targeted training etc)
51	C9.3	C9 Insufficient representation of different cultural and social groups in HR in the media sector	L	S	Regulatory safeguards for the representation of the various cultural and social groups in professional, management and board functions in private (commercial and/or non-profit) media
52	C9.4	C9 Insufficient representation of different cultural and social groups in HR in the media sector	L	S	Regulatory safeguards for the representation of the various cultural and social groups in professional, management and board functions in PSM
53	C9.5	C9 Insufficient representation of different cultural and social groups in HR in the media sector	L	S	Regulatory safeguards for the representation of the various cultural and social groups in media councils and/or other advisory bodies in the media sector
54	C10.1	C10 Limited accessibility by disabled people	S	U	Availability of content and service applications for disabled people
55	C10.2	C10 Limited accessibility by disabled people	L	U	Policies and support measures for enhanced access to media content and services by groups with special needs in society, like the elderly, disabled,...
56	G1.1	G1 High centralisation of the national media system	S	S	A relative strength of local/regional media (daily newspapers, TV channels, radio stations, news websites) in a particular media system
57	G1.2	G1 High centralisation of the national media system	S	S	Proportion of regional metropolises (main city in a given region, province, land) with competing regional or local media (daily newspapers, TV channels, radio stations, news websites)
58	G1.3	G1 High centralisation of the national media system	S	S	Combined ownership of regional/local media and national media outlets by the same company
59	G1.4	G1 High centralisation of the national media system	E	S	Ratio of number of cities with TV and radio stations to total number of cities
60	G1.5	G1 High centralisation of the national media system	E	S	Ratio of number of cities with newspapers to total number of cities

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
61	G2.1	G2 Insufficient system of regional and local media	E	S	Proportion of regional and local television and radio broadcast channels to national broadcast channels
62	G2.2	G2 Insufficient system of regional and local media	E	S	Proportion of regional and local newspapers to national newspapers
63	G2.3	G2 Insufficient system of regional and local media	E	S	Herfindahl Herschman Index (HHI) based on regional channels/newspapers available in the region, divided by total number of channels/newspapers
64	G2.4	G2 Insufficient system of regional and local media	E	S	Parity of financing of regional and /local TV, radio and newspapers relative to population size
65	G2.5	G2 Insufficient system of regional and local media	S	U	Estimated reach and audience share of regional and local media
66	G2.6	G2 Insufficient system of regional and local media	S	D	Access of regional and local media to networks and platforms
67	G2.7	G2 Insufficient system of regional and local media	S	S	Proportion of different types of media ownership of regional and local media
68	G2.8	G2 Insufficient system of regional and local media	S	S	Level of investment in production of regional/local news in regional and local media
69	G2.9	G2 Insufficient system of regional and local media	L	S	Regulatory safeguards for regional and local media
70	G2.10	G2 Insufficient system of regional and local media	L	S	Policies and support measures for regional and local media
71	G3.1	G3 Insufficient representation of regional and local communities in media content and services	S	S	Proportion of locally oriented and locally produced content
72	G3.2	G3 Insufficient representation of regional and local communities in media content and services	L	S	Regulatory safeguards for locally oriented and locally produced content on PSM channels and services
73	G4.1	G4 Insufficient representation of regional and local communities in HR in the media sector	S	S	Proportion of journalists and media executives based in local communities
74	G4.2	G4 Insufficient representation of regional and local communities in HR in the media sector	L	S	Regulatory safeguards for the representation of regional and local communities in media councils and/or other advisory bodies in the media sector

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
75	G5.1	G5 Dominance of a limited number of information sources for local issues	S	U	News source preferences of audiences for local issues (what is the primary source of information?)
76	G6.1	G6 Insufficient access to media and distribution systems due to geographic factors	S	U	Number of people without access to PSM because of geographic obstacles
77	G6.2	G6 Insufficient access to media and distribution systems due to geographic factors	L	D	Regulatory safeguards for universal coverage of PSM channels and services
78	G6.3	G6 Insufficient access to media and distribution systems due to geographic factors	S	D	Availability of broadband networks in rural areas
79	G6.4	G6 Insufficient access to media and distribution systems due to geographic factors	L	D	Policy measures to promote roll out of and access to broadband networks in remote and/or rural areas
80	G6.5	G6 Insufficient access to media and distribution systems due to geographic factors	L	D	Policies and support measures for the distribution of newspapers in remote areas
81	O1.1	O1 High ownership concentration in terrestrial television	E	S	Ownership concentration in terrestrial television (horizontal)
82	O1.2	O1 High ownership concentration in terrestrial television	E	D	Audience concentration in terrestrial television
83	O1.3	O1 High ownership concentration in terrestrial television	L	S	Regulatory safeguards against high concentration of ownership and/or control in television (horizontal)
84	O2.1	O2 High ownership concentration in radio	E	S	Ownership concentration in radio (horizontal)
85	O2.2	O2 High ownership concentration in radio	E	D	Audience concentration in radio
86	O2.3	O2 High ownership concentration in radio	L	S	Regulatory safeguards against high concentration of ownership and/or control in radio (horizontal)
87	O3.1	O3 High ownership concentration in newspapers	E	S	Ownership concentration in newspapers (horizontal)

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
88	O3.2	O3 High ownership concentration in newspapers	E	D	Readership concentration in newspapers
89	O3.3	O3 High ownership concentration in newspapers	L	S	Regulatory safeguards against high concentration of ownership and/or control in newspapers (horizontal)
90	O4.1	O4 High ownership concentration in Cable/Sat/ADSL/TV	E	S	Ownership concentration in Cable/Sat/ADSL-TV (horizontal)
91	O4.2	O4 High ownership concentration in Cable/Sat/ADSL/TV	E	D	Audience concentration in Cable/Sat/ADSL-TV
92	O4.3	O4 High ownership concentration in Cable/Sat/ADSL/TV	L	S	Regulatory safeguards against high concentration of ownership and/or control in Cable/Sat/ADSL-TV (horizontal)
93	O5.1	O5 High ownership concentration in magazines	E	S	Ownership concentration in magazines (horizontal)
94	O5.2	O5 High ownership concentration in magazines	E	D	Readership concentration in magazines
95	O5.3	O5 High ownership concentration in magazines	L	S	Regulatory safeguards against high concentration of ownership and/or control in magazines (horizontal)
96	O6.1	O6 High ownership concentration in internet content provision	E	S	Ownership concentration in internet content provision (horizontal)
97	O6.2	O6 High ownership concentration in internet content provision	E	D	Readership concentration in internet content provision
98	O6.3	O6 High ownership concentration in internet content provision	L	S	Regulatory safeguards against high concentration of ownership and/or control in internet content provision (horizontal)
99	O7.1	O7 High ownership concentration in book publishing	E	S	Ownership concentration in book publishing (horizontal)
100	O7.2	O7 High ownership concentration in book publishing	E	D	Readership concentration in book publishing
101	O7.3	O7 High ownership concentration in book publishing	L	S	Regulatory safeguards against high concentration of ownership and/or control in book publishing (horizontal)
102	O8.1	O8 High concentration of cross-media ownership	E	S	Number of sectors in which top 8 firms/owners are active

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
103	O8.2	O8 High concentration of cross-media ownership	L	S	Regulatory safeguards against high degree of cross-ownership between radio and television
104	O8.3	O8 High concentration of cross-media ownership	L	S	Regulatory safeguards against high degree of cross-ownership between print (or text-based) and audiovisual media
105	O9.1	O9 High vertical concentration	L	D	Regulatory safeguards against bottlenecks in distribution/networks resulting from vertical integration
106	O9.2	O9 High vertical concentration	L	S	Regulatory safeguards against high degree of integration between advertising and media activities
107	O10.1	O10 Lack of transparency in ownership structures	L	S	Regulatory safeguards for transparency of ownership and/or control towards the public
108	O10.2	O10 Lack of transparency in ownership structures	L	S	Regulatory safeguards for transparency of ownership and/or control towards the relevant authorities
109	P1.1	P1 Political bias in the media	S	S	Proportion of the various political and ideological viewpoints and interests represented (given voice) in the media
110	P1.2	P1 Political bias in the media	S	S	Indication of dominant (positive or negative) media portrayal of specific political actors
111	P1.3	P1 Political bias in the media	S	S	Indication of range of investigative reporting disclosing hidden actions of various political actors or groups
112	P1.4	P1 Political bias in the media	L	S	Regulatory remedies against political bias in the media (right to reply, complaints mechanisms...)
113	P1.5	P1 Political bias in the media	L	S	Regulatory safeguards for fair, balanced and impartial political reporting in PSM
114	P1.6	P1 Political bias in the media	L	S	Regulatory safeguards for fair and accurate political reporting in private radio and television broadcasting
115	P1.7	P1 Political bias in the media	L	S	Regulatory safeguards for fair and accurate political reporting in print media
116	P1.8	P1 Political bias in the media	L	S	Regulatory safeguards for the fair representation of the various political groups in management or board functions of private audiovisual media (if these include political representatives)
117	P1.9	P1 Political bias in the media	L	S	Regulatory safeguards for the representation of the various political groups in media councils and/or other advisory bodies in the media sector (if these include political representatives)

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
118	P2.1	P2 Political bias in the media during election periods campaigns	S	U	Level of successful complaints to the media and self-regulatory bodies by citizens or political groups with regard to misconduct in political reporting during election campaigns
119	P2.2	P2 Political bias in the media during election periods campaigns	S	S	Indication of the level of partisanship and political bias in the media during election campaigns
120	P2.3	P2 Political bias in the media during election periods campaigns	L	S	Regulatory safeguards for fair, balanced and impartial coverage of election campaigns in radio and television broadcasting
121	P2.4	P1 Political bias in the media	L	S	Regulatory safeguards for fair access to airtime on PSM channels and services by political actors during election campaigns
122	P2.5	P1 Political bias in the media	L	S	Regulatory safeguards relating to political advertising in election campaigns
123	P3.1	P3 Excessive politicisation of media ownership/control	S	S	Public access to data about political affiliation of media owners
124	P3.2	P3 Excessive politicisation of media ownership/control	S	S	Proportion of specific political affiliations of the media owners across the media market in terms of audience share, including proportion of the media owned by political parties, politicians or political groupings
125	P3.3	P3 Excessive politicisation of media ownership/control	S	S	Proportion of the state ownership in the media across the media markets in terms of audience share
126	P3.4	P3 Excessive politicisation of media ownership/control	S	S	Level of discrimination in distribution of state advertisements reflected in favouritism of the media owned by political parties or affiliates of political parties in the government or penalisation of the media critics
127	P3.5	P3 Excessive politicisation of media ownership/control	L	S	Regulatory safeguards against excessive ownership and/or control of media by politicians
128	P3.6	P3 Excessive politicisation of media ownership/control	L	S	Regulatory safeguards for structural, financial,...independence of mainstream radio and TV channels from political parties/politicians (in addition to editorial independence)
129	P4.1	P4 Insufficient editorial independence	S	S	Representation of the interests of media professionals and media employers in labour relations is established through professional associations, providing high level of participation of media professionals and media publishers in their membership.
130	P4.2	P4 Insufficient editorial independence	S	S	Evidences of conflicts between editorial staff and media owners due to attempts of political instrumentalisation of the media

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
131	P4.3	P4 Insufficient editorial independence	S	S	Presence of professional associations providing advocacy for editorial independence and respect of professional standards
132	P4.4	P4 Insufficient editorial independence	L	S	Regulatory safeguards for editorial independence of in print media from political actors
133	P4.5	P4 Insufficient editorial independence	L	S	Regulatory safeguards for editorial independence of mainstream radio and television broadcast channels (linear AVMS) from political actors
134	P4.6	P4 Insufficient editorial independence	L	S	Regulatory safeguards for editorial independence of mainstream non-linear AVMS from political actors
135	P5.1	P5 Insufficient independence of PSM	S	S	Level of independence of PSM considering appointment procedures and composition of its governing bodies/Level of equal/proportionate representation of all political groups (represented in the parliament) in the governing bodies
136	P5.2	P5 Insufficient independence of PSM	S	S	Level of independence of PSM considering mechanisms of its financing
137	P5.3	P5 Insufficient independence of PSM	S	S	Level of independence of PSM considering mechanisms of appointments and dismissal of key personnel / Indication of whether key editorial personnel and management of PSM change with the change of the government
138	P5.4	P5 Insufficient independence of PSM	L	S	Regulatory safeguards for editorial independence of PSM channels and services from government/political powers
139	P5.5	P5 Insufficient independence of PSM	L	S	Fair, objective and transparent appointment procedures for professional, management and board functions within PSM ensuring independence from government/a single political group
140	P6.1	P6 Insufficient pluralism of news agencies	S	S	Range and independence of competing news agencies
141	P6.2	P6 Insufficient pluralism of news agencies	S	S	Level of state ownership in news agencies and level of independence of state owned news agencies

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
142	P7.1	P7 Insufficient pluralism of distribution systems	S	D	Discrimination by politically affiliated television and radio distribution networks
143	P7.2	P7 Insufficient pluralism of distribution systems	S	D	Discrimination by politically affiliated distribution networks for print media
144	P8.1	P8 Insufficient citizen activity and political impact in online media	S	D	Range of citizens and citizens' groups using online media for posting their content relevant for political debate
145	P8.2	P8 Insufficient citizen activity and political impact in online media	S	U	Level of influence on political and public debate by bloggers
146	T1.1	T1 Lack of/under-representation of/dominance of media types	E	D	Audience parity between the TV channels of commercial broadcasters and of PSM
147	T1.2	T1 Lack of/under-representation of/dominance of media types	E	S	Financial parity between the TV channels of commercial broadcasters and of PSM
148	T1.3	T1 Lack of/under-representation of/dominance of media types	E	D	Audience parity between the radio channels of commercial broadcasters and of PSM
149	T1.4	T1 Lack of/under-representation of/dominance of media types	E	S	Financial parity between the radio channels of commercial broadcasters and of PSM
150	T1.5	T1 Lack of/under-representation of/dominance of media types	E	U	Percent of GDP per capita required for an individual to obtain TV and radio reception, newspaper subscription, magazine subscription, or Internet Service
151	T1.6	T1 Lack of/under-representation of/dominance of media types	L	D	Regulatory safeguards for the distribution of public interest channels on cable, DSL and/or satellite platforms
152	T2.1	T2 Lack of/under-representation of/dominance of media genres	E	S	Ratio of news/public affairs, education and entertainment programmes on terrestrial TV to total programmes on terrestrial TV
153	T2.2	T2 Lack of/under-representation of/dominance of media genres	E	S	Ratio of news/public affairs, education and entertainment programmes on radio to total programmes radio
154	T2.3	T2 Lack of/under-representation of/dominance of media genres	E	S	Ratio of news/public affairs, education and entertainment magazines to total number of magazines

N°	ID	RISK	TYPE INDICATOR	AREA	KEY INDICATOR
155	T2.4	T2 Lack of/under-representation of/dominance of media genres	E	S	Ratio of Cab/Sat/ADSL-TV channels dedicated to news/public affairs, education and entertainment to total number of Cab/Sat/ADSL-TV channels
156	T2.5	T2 Lack of/under-representation of/dominance of media genres	L	S	Regulatory safeguards for the presence of a diversity of media genres on the channels and services of private (commercial and non-profit) audiovisual media
157	T2.6	T2 Lack of/under-representation of/dominance of media genres	L	S	Regulatory safeguards for the public's access to major events on free television
158	T2.7	T2 Lack of/under-representation of/dominance of media genres	L	S	Regulatory safeguards for short news reporting on events of high interest in case of exclusive broadcast rights
159	T2.8	T2 Lack of/under-representation of/dominance of media genres	L	S	Regulatory safeguards for a varied and pluralistic offer on PSM channels and services
160	T3.1	T3 Lack of sufficient market resources to support range of media	E	U	Ratio of consumer spending on different media per capita to GDP per capita
161	T3.2	T3 Lack of sufficient market resources to support range of media	E	U	Ratio of advertising expenditures per capita to GDP per capita
162	T4.1	T4 Lack of sufficient resources to support public service media	L	S	Regulatory safeguards for the objective and independent allocation of (adequate, consistent and sufficient) resources to PSM
163	T5.1	T5 Insufficient engagement of PSM in new media	L	S	Regulatory safeguards for the engagement/presence of PSM in/on new media
164	T5.2	T5 Insufficient engagement of PSM in new media	S	S	Proportion of employees dedicated to new media services
165	T5.3	T5 Insufficient engagement of PSM in new media	S	S	Amount of financing invested in new media by the PSM
166	T6.1	T6 Insufficient attention paid to public participation	S	S	Proportion of online media offering space for publicly available comments and complaints