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Growing threats to media pluralism and the independence of the media

Report[1]
Committee on Culture, Science, Education and Media
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1. Reference to committee: Doc. 15916, Reference 4798 of 15 April 2024.

A. Draft resolution[2]

1. The Parliamentary Assembly is gravely concerned by the growing threats to media pluralism and to the independence of the media. Evidence of this worrying trend can be observed in the increasing editorial control of the media sector by political and economic actors (so-called media capture), the mounting pressure against public service media, the emergence of "news deserts", and the intensification of competition and market dominance from online platforms.

2. As stated by the Committee of Ministers in its Declaration on the financial sustainability of quality journalism in the digital age, the sustainability of media outlets is at great risk, and this weighs particularly heavily on the local, investigative and cross-border journalism.This fact renders journalists vulnerable to pressures from powerful news sources and their employers, impinges on their investigative capacities and creates a climate conducive to both censorship and self-censorship. Moreover, the weakened sustainability has contributed to a growing concentration of media ownership and may lead to a less diverse news environment.

3. The Assembly recognises that a certain level of media concentration is not inherently detrimental and can, in fact, play a beneficial role by ensuring the long-term sustainability of the media sector, particularly in small markets. However, an effective approach is essential to mitigate its potential adverse effects on the diversity and quality of available information. As such, mergers and acquisitions in the media sector should be assessed according to their impact on media independence and pluralism.

4. As recalled in Recommendation CM/Rec(2018)1 of the Committee of Ministers to member States on media pluralism and transparency of media ownership, transparency of media ownership can be helpful in making media pluralism effective by bringing ownership structures behind the media – which can influence editorial policies – to the awareness of the public and regulatory authorities.

5. The Assembly firmly reiterates that the editorial independence of the media must be protected at all costs, and that the governance and financing of public service media must be properly regulated and monitored in order to avoid political interference.

6. The Assembly is alarmed by the capture of the media sector by political and financial actors for the purposes of controlling public information, concealing critical voices and manipulating public opinion. It is imperative to conduct research in order to elucidate the manner in which political and economic actors exercise control and exert influence over the media sector in ways contrary to public interest.

7. The Assembly emphasises the fundamental role that national media regulatory authorities can play in preventing media capture. In order to fully achieve this objective, it is essential that these authorities are independent, both in principle and in practice, and that they have adequate financial and human resources to fulfil their role, particularly in light of the enhanced competences that some of them will have under the new European Union legislation. Their decisions must be objective, justified, transparent, non-discriminatory, proportional, and subject to appeal before an independent appellate body.

8. There cannot be independent news media without an environment in which journalists can work safely and without fear or undue restrictions. Unfortunately, there is an increasing variety of threats, pressures and constraints under which journalists are carrying out their mission.

9. In this regard, the Assembly is deeply worried by the assessment carried out in 2025 by the partner organisations of the Council of Europe's Platform to promote the protection of journalism and safety of journalists, which concludes that press freedom in Europe "stands at a tipping point", and endorses the recommendations outlined in the assessment.

10. Russia's ongoing war of aggression against Ukraine continues to pose the most significant threat to journalists across Europe. In relation to this issue, the Assembly recalls that journalists are civilians and are protected as such under international law, and that targeting and killing journalists is a war crime.

11. Beyond conflict zones, journalists in Europe often face legal harassment as well as online and physical threats or attacks for simply doing their jobs; in particular, women journalists are disproportionately affected by intimidation and harassment.

2. Draft resolution adopted by the committee on 22 June 2026.

12. The Assembly is concerned about the emergence of "news deserts", namely geographic or administrative areas, or social communities, where it is difficult or impossible to access sufficient, reliable, diverse information from independent local, regional and community media.

13. The Assembly acknowledges that there is no single solution to all instances of news deserts. There are nevertheless good practices and alternative business models that should be considered, with a view to reducing reliance on advertising and, as much as possible, ensuring independence from online platforms. The most successful experiences across Europe are those that rely upon pay membership or subscription, but this approach is not universally applicable.

14. Moreover, there is a lot of interest in philanthropy in some countries coming from bodies or foundations that are not linked with online platforms. The Assembly believes this is an issue that should be further investigated. Other options on the table are tax relief for local media outlets, a special status for the media, and redistribution of copyright revenues.

15. In this regard, it is imperative that the public support for local media be transparent and fair in allocating resources, including State advertising, in order to avoid media capture and threats to the independence of the media in general.

16. The Assembly stresses the urgent need to address the lack of data related to the economic and financial information for both local and community media. Locally focused audience measurements and detailed research on trust, audience perspectives, perceptions and engagement within local media markets are required.

17. The Assembly acknowledges that the European Union's European Media Freedom Act (EMFA) is a step in the right direction as it provides a template for action and includes measures intended to combat media capture. Non-EU countries, however, do not benefit from the protection provided by the EMFA.

18. The Assembly underscores the importance of discoverability in the online environment, that is, the ease with which an audiovisual work or service can be located on a platform or interface. Content prioritisation practices, algorithm recommendations and curation strategies have the potential to exert a detrimental effect on cultural diversity.

19. It is therefore vital that services of general interest, and in particular public service media, are given appropriate prominence on online platforms and TV interfaces.

20. In this regard, the Assembly notes with concern that connected TVs and virtual assistants are increasingly acting as gateways to audiovisual content and have therefore the potential to become gatekeepers with the power to determine which content is prioritised on our screens.

21. A further problematic issue is the exploitation of dominant positions by providers of artificial intelligence services that monetise third-party content without effective control by rightsholders and without offering fair remuneration.

22. In the light of these considerations, the Assembly calls on the Council of Europe member States to undertake the following measures:

22.1. introduce a legal requirement for national media regulatory authorities to regulate and monitor media pluralism in the audiovisual sector;

22.2. ensure the public availability and accessibility of accurate, up-to-date data concerning direct and beneficial ownership of the media, as well as other interests that influence the strategic decision making of the media in question or its editorial line, as advocated by Recommendation CM/Rec(2018)1 of the Committee of Ministers to member States on media pluralism and transparency of media ownership;

22.3. assess whether the disclosure of beneficial ownership of the media is mandatory in their legislation, including indirect control and financial interests, and make this information easily accessible through public registers;

22.4. assess the existence of media ownership rules in their national legislation and their applicability to new media services and online platforms;

22.5. establish rules in national legislation with the aim of limiting any potential interference with the editorial independence and operational autonomy of the media, and ensure that oversight is provided by national media regulatory authorities;

22.6. ensure that administrative decisions taken by national media regulatory authorities are objective, justified, transparent, non-discriminatory, proportional and subject to appeal before an independent appellate body;

22.7. encourage the development of common practices among European national media regulatory authorities for monitoring the internal pluralism of public service media;

22.8. ensure that national legislation relating to the governance of public service media contains robust guarantees for the independence of the appointment process for management bodies, and include the participation of civil society in this process;

22.9. provide action plans for a targeted and viewpoint-neutral support aimed at ensuring the sustainability of public service media, non-profit media and community media;

22.10. provide action plans for a targeted support of quality journalism, as defined in Recommendation CM/Rec(2022)4 of the Committee of Ministers to member States on promoting a favourable environment for quality journalism in the digital age;

22.11. provide financial support schemes for media sectors in particular for regional, local, hyperlocal and not-for-profit community media, with accompanying safeguards for their independent administration and oversight and for equitable and non-discriminatory distribution of such support in line with the principles of transparency and accountability and with the standards of the Council of Europe, as proposed by the Declaration by the Committee of Ministers on the financial sustainability of quality journalism in the digital age;

22.12. support alternative business models and non-profit initiatives regarding the provision of local news media services in geographic areas that experience a lack of reliable and diverse information sources from credible media outlets;

22.13. engage in effective co-operation with the Council of Europe's Platform to promote the protection of journalism and safety of journalists and provide timely and substantive responses to the the Platform alerts;

22.14. repeal or amend laws used to intimidate journalists, including criminal defamation and overly broad "fake news" or "State secrets" provisions and ensure clear public interest exemptions where restrictions apply;

22.15. adopt measures to protect women journalists and integrate gender-responsive and intersectional safeguards into journalist safety policies, including guidance for law enforcement, protective measures and digital security support;

22.16. implement Recommendation CM/Rec(2024)2 of the Committee of Ministers to member States on countering the use of strategic lawsuits against public participation (SLAPPs);

22.17. offer protection against transnational repression of journalists, foster a culture of respect for press freedom and promote social dialogue and collective bargaining for all journalists, including freelancers;

22.18. ensure that media of general interest, and in particular public service media, are given appropriate prominence across all platforms;

22.19. ensure that the integrity of media services is safeguarded against unfair manipulation by online platforms;

22.20. adopt a regulatory approach that balances the rights and interests of artificial intelligence providers and copyright holders so that innovation is not achieved at the expense of creators, as requested by the Assembly in its Resolution 2654 (2026) "Copyright enforcement in the artificial intelligence environment".

B. Draft recommendation[3]

1. The Parliamentary Assembly refers to its Resolution …(2026) "Growing threats to media pluralism and the independence of the media" which draws the attention of the Council of Europe member States to the increasing editorial control of the media sector by political and economic actors (so-called "media capture"), the mounting pressure against public service media, the emergence of "news deserts", and the intensification of competition and market dominance from online platforms.

2. As recalled in Recommendation CM/Rec(2018)1 of the Committee of Ministers to member States on media pluralism and transparency of media ownership, transparency of media ownership can be helpful in making media pluralism effective by bringing ownership structures behind the media – which can influence editorial policies – to the awareness of the public and regulatory authorities.

3. Currently, however, there is no single body that provides Europe-wide information on media ownership.

4. The Assembly congratulates the Committee of Ministers for its unwavering commitment to the principles of media pluralism and the independence of the media in Europe, and invites it to collaborate with the member States and the European Union towards the creation of a pan-European database of media ownership in Europe.

5. In accordance with the guidance provided in Recommendation CM/Rec(2018)1, this database should aim at providing the public with easy, swift and effective access to data about media ownership and control arrangements in the whole of Europe, including disaggregated data about different types of media (markets/ sectors) and regional and/or local levels, as relevant. These data should be kept up to date and made available to the public free of charge and without delay, and their availability should be made public. Their contents should be made available in open formats and there should be no restrictions on their reuse.

6. The body in charge of administering this database should publish regular reports on media ownership in Europe.

3. Draft recommendation adopted by the committee on 22 June 2026.

C. Explanatory memorandum by Ms Valentina Grippo, rapporteur[4]

1. Introduction

1. This report originated in the motion for a resolution on "Media concentration and threats to media pluralism and independence" Doc. 15916, which was referred to the committee on Culture, Science, Education and Media for report on 15 April 2024. Its signatories are concerned by the fact that media pluralism is challenged by the increased economic pressure and competition through digital media, but also by the more insidious phenomenon of media capture and by the emergence of so-called "news deserts".

2. A certain level of media concentration is not inherently detrimental and can, in fact, play a beneficial role by ensuring the long-term sustainability of the media sector, particularly in small markets. However, effective regulation is essential to mitigate potential adverse effects on the diversity and quality of available information. As such, mergers and acquisitions in the media sector should be assessed according to their impact on media independence and pluralism.

3. In this regard, transparency of ownership structures in the media sector is of paramount importance for determining whether or not a company holds an absolute or relative dominant position and can therefore have an impact on media pluralism.[5]

4. Media capture[6] is "a situation where a group of interests formed around a country's political and business power takes over and abuses the key regulatory and funding mechanisms, the public media, as well as a majority of the privately owned media to control the journalistic narrative with the long-term purpose of maintaining their grip on power and, with it, access to public resources".[7] Media capture uses seemingly legal means to create economic or regulatory barriers to market entry for independent media, limiting their ability to generate revenue, to operate, and ultimately inform the public. It is also an increasingly popular tool of authoritarian and illiberal or populist governments to control public information, conceal critical voices and manipulate public opinion.

5. A "news desert" can be defined as "a geographic or administrative area, or a social community, where it is difficult or impossible to access sufficient, reliable, diverse information from independent local, regional and community media".[8] Local markets may be left unserved by media outlets, since local news are mostly uninteresting for big groups, and hence remain uncovered since no journalists would be dedicated to this purpose. Moreover, local newspapers may disappear due to lack of financial viability. Consequently, local communities are compelled to depend on social media platforms as the primary source and vehicle of information. The consequences of this for local democratic processes are significant, as it effectively eliminates the role of critical journalism in these communities.

6. The exponential development of online platforms as gatekeepers of information raises serious concerns for media pluralism. This affects not only the variety of media sources that individuals are exposed to but also to the quality and diversity of the information they receive and impart, which can result in so-called "filter bubbles", generate fragmentation and result in a more polarised society.

7. In line with the motion for a resolution, and following the change of title accepted by the committee,[9] this report examines the current growing threats to media pluralism and to the independence of the media in order to propose concrete lines of action. My analysis builds on contributions from several experts we heard from.[10]

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4. The explanatory memorandum is drawn up under the responsibility of the rapporteur.
5. For an in-depth view on the issue see e.g Cappello M. (ed.), "Transparency of media ownership", IRIS Special, European Audiovisual Observatory, Strasbourg, 2021.
6. See https://csd.eu/fileadmin/user_upload/events_library/files/2023_03/Media_Capture_SELDI_29.03.2023.pdf.
7. Dragomir, M. & Horowitz, A., "Media Capture and Its Contexts: Developing a Comparative Framework for Public Service Media". In: Tunez-Lypez, M. et al (eds.) The Values of Public Service Media in the Internet Society, Palgrave Macmillan, 2021.
8. See European University Institute, "Uncovering news deserts in Europe – Risks and opportunities for local and community media in the EU", 2024.
9. Decision made during the meeting of the Committee on Culture, Science, Education and Media of 22 June 2026.
10. I wish to thank in particular: Mr. Scott Griffen, Executive Director, International Press Institute, Ms Rachael Craufurd-Smith, Reader in EU Law at the Edinburgh Law School, University of Edinburgh, United Kingdom; Ms Elda Brogi, Deputy Director of the Centre for Media Pluralism and Media Freedom, Florence, Italy; Mr Richard Walker, journalist, United Kingdom; Mr Andrei Richter, PhD, Professor Researcher, Department of Journalism, Faculty of Arts, Comenius University

2. Council of Europe standards

8. The Parliamentary Assembly and the committee on Culture, Science, Education and Media in particular have been addressing the issue of media concentration and media pluralism and independence for several years. In Resolution 2065 (2015) "Increasing transparency of media ownership", we recalled that media ownership transparency is necessary to enable members of the public to form an opinion on the value of the information, ideas and opinions disseminated by the media (paragraph 1), and recommended, among others, that parliaments of the member States review their legislation to ensure adequate transparency of the ownership of, and influence over, media outlets (print media, film, radio, television and Internet-based media), including the disclosure of hidden ownership (paragraph 8). In its parallel Recommendation 2074 (2015), the Assembly recommended that the Committee of Ministers reviewed and further developed Council of Europe standards in this field; invite the European Audiovisual Observatory to consider extending its action in line with the technological convergence of digital media and report on media ownership; co-operate with the European Platform of Regulatory Authorities (EPRA); and invite associations of media outlets to set up, in a co-ordinated way, ethical standards on transparency of media ownership.

9. In Resolution 2179 (2017) "Political influence over independent media and journalists", we called on national authorities to recognise and oppose the threat that more insidious methods pose to the independence and genuine pluralism of the media, to the interest of the public in receiving unbiased, critical information and hence to our democratic systems (paragraph 3).

10. In Resolution 2212 (2018) "The protection of editorial integrity", the Assembly expressed its concern about the direct intervention of State authorities in the media sphere, not only by means of direct ownership, but also through partisan appointments to leadership positions in broadcasting and allocation of broadcasting licences, favouring selected media and weakening others by inequitable allocation of advertising budgets of government agencies and public companies.

11. In Resolution 2532 (2024) "Guaranteeing media freedom and the safety of journalists: an obligation of member States", the Assembly called on member States to review legislation which can be abused or misused to unduly restrict media freedom, threaten journalists and seek to silence them; analyse the political, legal and economic conditions which lead to media capture, and take adequate measures to counter this phenomenon and safeguard independent media; improve the legislative and regulatory framework against political interference and the undue concentration of media ownership; support genuine public service media, securing their viability and editorial independence, according to the basic Council of Europe standards; and ensure that financing schemes for private media outlets are based on fair and objective criteria and operated in a transparent and non-discriminatory manner. The Assembly was concerned, in particular, by the expanding phenomenon of media capture in Hungary, Poland and Serbia, and the alarming number of journalists detained in Türkiye.

12. Media concentration and its impact on media pluralism have also been covered in detailed studies by the Council of Europe intergovernmental sector.[11] The most important legal instrument in this regard is Recommendation CM/Rec(2018)1 of the Committee of Ministers to member States on media pluralism and transparency of media ownership, which deals with the challenges that opaque media ownership and financing, media concentration and convergence pose to the plurality of ideas and the right of individuals to access and impart information. Its preamble recalls that transparency of media ownership can help to make media pluralism effective by bringing ownership structures behind the media – which can influence editorial policies – to the awareness of the public and regulatory authorities. This is particularly important now since ongoing technological, financial, regulatory and other changes in the media sector in Europe raise concerns for media pluralism. Therefore, fresh appraisals of existing approaches to media pluralism would be needed in order to address the resulting challenges for freedom of expression: more comparative data on individuals' use of online media content; appropriate media regulation in order to maintain or restore the integrity of the democratic process and to prevent bias, misleading information or suppression of information; new policy responses and strategic solutions to sustain independent, quality journalism and to enhance citizens' access to diverse content across all media types and formats; and ways of addressing the growing concerns arising from pressure exerted on the media by political and economic interests, acting alone or in concert, in order to influence public opinion or otherwise impinge on the independence of the media.

Bratislava; Mr Frédéric Bokobza, Deputy Director General of the Regulatory Authority for Audiovisual and Digital Communication (Arcom), France; and Ms Elena Rivas Pérez, EU Legal & Policy Officer, Association of Commercial Television and Video on Demand Services in Europe (ACT), Brussels, Belgium.

11. See www.coe.int/en/web/freedom-expression/committee-of-ministers-adopted-texts.

13. According to Recommendation CM/Rec(2018)1, the adoption and effective implementation of media ownership regulation can play an important role in respect of media pluralism, enhancing transparency in media ownership and addressing issues such as cross-media ownership, direct and indirect media ownership and effective control and influence over the media.

14. The appendix of Recommendation CM/Rec(2018)1 provides guidelines on the States' positive obligations to foster a favourable environment for freedom of expression and media freedom and to guarantee media pluralism and diversity of media content. It encourages them to develop and implement a comprehensive regulatory framework that takes particular account of media ownership and control and is adapted to the current state of the media industry. States should also promote a regime of transparency of media ownership that ensures the public availability and accessibility of accurate, up-to-date data concerning direct and beneficial ownership of the media, as well as other interests that influence the strategic decision making of the media in question or its editorial line. Finally, they should promote media literacy with a view to enabling individuals to access, understand, critically analyse, evaluate, use and create content through a range of traditional and digital (including social) media.

15. Regarding transparency of media ownership, it recommends that member States include a requirement for media outlets operating within State jurisdiction to disclose ownership information directly to the public on their website or other publication and to report this information to an independent national media regulatory body or other designated body, tasked with gathering and collating the information and making it available to the public. This body should be provided with sufficient and stable financial resources and staff to enable it to effectively carry out its tasks. The scope of the transparency obligations for the media should include legal and natural persons based in other jurisdictions and their relevant interests in other jurisdictions.

16. Furthermore, member States are encouraged to adopt measures conducive to the disclosure of information on the sources of the media outlet's funding obtained from State funding mechanisms (advertising, grants and loans), as well as to promote the disclosure by media outlets of contractual relations with other media or advertising companies and political parties that may have an influence on editorial independence.

17. National media regulatory authorities (NRAs) or other designated body should ensure that the public has easy, swift and effective and searchable access to data about media ownership and control arrangements in the State, for example in the form of online databases. Member States should also encourage NRAs or other designated body or institution to publish regular reports on media ownership.

18. The 2019 Declaration by the Committee of Ministers on the financial sustainability of quality journalism in the digital age encourages the Council of Europe member States to put in place a regulatory and policy framework that facilitates the operation of quality journalism in Europe, while not constraining media outlets' editorial and operational independence. The Declaration recommends the implementation of a series of measures aimed at addressing the impact of the digital transition on the media landscape, as well as other ongoing challenges, in order to preserve a viable media ecosystem.

19. Recommendation CM/Rec(2022)4 of the Committee of Ministers to member States on promoting a favourable environment for quality journalism in the digital age calls on member States to promote a favourable environment for quality journalism in the digital age and provides a number of guidelines to this effect. Notably, it encourages member States to take the necessary steps aimed at ensuring the financial sustainability of quality journalism as a public good, as well as the structural conditions for its development. States should encourage a variety of funding models for quality journalism, which may include not-for-profit organisations and models based on reader payment such as (digital) subscriptions and membership fees and donations from users and other actors. Such measures should furthermore pay particular attention to the situation of those parts of the field that are facing increasing financial challenges, such as local journalism, investigative journalism and cross-border journalism. As regards public service media, member States should ensure stable and sufficient funding for public service media in order to guarantee their editorial and institutional independence, their capacity to innovate, high standards of professional integrity, and to enable them to properly fulfil their remit and deliver quality journalism. Finally, as regards community and local media, member States should develop and promote a range of funding schemes and instruments, including at the local level. This may include the availability of public funds for the provision of local news in the public interest, and other measures to ensure that community media, as well as other types of independent media serving local and rural communities, have the space and adequate resources to operate on all distribution platforms.

3. European Union law and policy

20. Given the European Union (EU)'s limited competence in the field of media pluralism, the EU relied until recently on competition law in general and the EU Merger Regulation[12] in particular as a means of addressing potential plurality concerns in media markets. However, EU competition law is not intended to replace national media concentration controls and measures to ensure media pluralism. The EU Merger Regulation states clearly that “plurality of the media” can be regarded as a separate legitimate interest and EU member States may take appropriate measures to protect it (see Article 21.4 of the Merger Regulation), and as explained by the European Commission in its News Corp/ BSkyB decision,[13] a decision based on competition-related grounds under the Merger Regulation is without prejudice to the media plurality review of the relevant national authorities. The focus in merger control is whether there is a "significant impediment to effective competition", whereas a media plurality review reflects the crucial role media plays in a democracy and looks at wider concerns about whether the number, range and variety of persons with control of media enterprises will be sufficient.

21. The EU can only intervene, however, when there is an internal market dimension and when the turnover thresholds were very high. Because of these high thresholds, a major player could become dominant in the market because of network effects, exercising the advantages of scale to consolidate its position. Another problem is defining the actual markets for competition law. The EU tends to take quite a narrow product market, and therefore it has traditionally seen different media activities as being distinct from a market perspective.

22. Given the way concentration rules operate and in particular because they require a case by case analysis that is usually very complex and time consuming, the EU adopted in 2022 the Digital Markets Act (DMA). The purpose of the DMA is to contribute to the proper functioning of the internal market by laying down harmonised rules ensuring for all businesses, contestable and fair markets in the digital sector across the EU where gatekeepers are present. Gatekeepers are very large and powerful providers of core platform services (including search engines and online platforms), and the DMA requires them to ensure that they do not engage in specific anti-competitive practices, thereby avoiding case by case analysis and being a much faster and clearer form of regulation.

23. According to the DMA, a provider cannot use data from different services and use that to its advantage, and it has to avoid certain forms of anti-competitive practices that are clearly specified there, such as:

– treat services and products offered by the gatekeeper itself more favourably in ranking than similar services or products offered by third parties on the gatekeeper's platform;

– prevent consumers from linking up to businesses outside their platforms;

– prevent users from un-installing any pre-installed software or app if they wish so;

– track end users outside of the gatekeepers' core platform service for the purpose of targeted advertising, without effective consent having been granted.

24. Regarding mergers, the DMA includes a reporting requirement whereby a gatekeeper must inform the European Commission of any intended concentration where the merging entities or the target of concentration provide core platform services or any other services in the digital sector or enable the collection of data, irrespective of whether it is notifiable to the Commission under that Regulation or to a competent national competition authority under national merger rules (Article 14(1) DMA). Moreover, it draws a link with the Merger Regulation because, when a merger is notified to the European Commission, a concerned Member State can refer the matter for consideration by the European Commission even though the merge does not meet the normal thresholds of the Merger Regulation (Article 14(5) DMA). Finally, in the case of "systemic non-compliance" of a gatekeeper regarding its DMA obligations, the European Commission may impose the prohibition, during a limited period, for the gatekeeper to enter into a concentration regarding the core platform services or the other services provided in the digital sector or enabling the collection of data that are affected by the systematic non-compliance (Article 18(2) DMA).

25. A second important development is the European Media Freedom Act (EMFA), a EU regulation that lays down common rules for the proper functioning of the internal market for media services,[14] establishes the European Board for Media Services, and aims at safeguarding the independence and pluralism of media services.

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12. See https://competition-policy.ec.europa.eu/mergers/legislation/regulation_en.
13. Case No COMP/M.5932 – News Corp/ BSkyB, Notification of 3 November 2010.

26. The overarching objective of the EMFA is to facilitate the operation of media across borders within the EU's internal market with a view to avoiding undue pressure on media entities and to take into account the digital transformation of the media landscape.

27. Regarding media concentration and pluralism, the EMFA contains a specific reporting requirement in its Article 22 asking member States to establish substantive and procedural rules allowing assessment of media market concentrations which have a significant impact on media pluralism. It identifies specific considerations that must be taken into account, including the effects on the formation of public opinion, and the diversity of media services and media offerings and the scope for the Commission to issue guidelines on certain of these elements and to therefore draw on the experience of the different member States. Although the EMFA does not harmonise national legislation at EU level, it requires member States to align these rules, leaving some room for interpretation for each article.[15]

28. Regarding transparency of media ownership, Article 6(1) EMFA provide that media service providers must make easily and directly accessible to the recipients of their services up-to-date information on:

– their legal name or names and contact details;

– the name or names of their direct or indirect owner or owners with shareholdings enabling them to exercise influence on the operation and strategic decision making, including direct or indirect ownership by a State or by a public authority or entity;

– the name or names of their beneficial owner or owners;[16]

– the total annual amount of public funds for State advertising allocated to them and the total annual amount of advertising revenues received from third-country public authorities or entities.

29. According to Article 6(2) EMFA, member States must entrust national regulatory authorities or bodies or other competent authorities or bodies with the development of national media ownership databases containing this ownership information.

4. Current trends

30. Looking back to the last 10 years, the Media Pluralism Monitor (MPM)[17] has pointed out to a number of developing trends, such as the opacity of online platform practices, the poor working conditions for journalists, threats and hate speech in the online environment, strategic lawsuits against public participation (SLAPPs) and defamation lawsuits.

31. Regarding media pluralism trends, there is a high media ownership concentration across Europe, reduced plurality of media providers and the use of concentration as a means of defence. Online platforms have evolved into powerful intermediaries for information dissemination, creating significant power imbalances between platform, media and the State as well. Moreover, traditional media is losing advertising revenues and paying readership and the need to find alternatives. There are other worrying trends, such as the personalisation of news and advertising, the limited willingness to pay for news, increasing threats to editorial autonomy, attacks by political actors, eroding social norms, limited independence of public service media, lack of gender equality in the media, and low media and digital literacy.

32. The MPM2025 report covers the EU member States plus five candidate countries: Albania, Montenegro, Republic of North Macedonia, Serbia and Turkey.[18] The report warns that independent journalism across Europe is facing mounting pressure from economic, technological, and political forces, threats that now cut across nearly every EU Member State.

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14. The EMFA's legal basis is the so-called internal market clause of Art. 114 of the Treaty on the Functioning of the European Union (TFEU). This choice of legal basis has been rather controversial and is at the core of a legal challenge pending before the CJEU, see Action brought on 10 July 2024 – Hungary v. European Parliament and Council of the European Union (Case C-486/24). For further information see Cappello M. (ed.), "The European Media Freedom Act unpacked", IRIS, European Audiovisual Observatory, Strasbourg, November 2024.

15. Beyond legislation, the EU supports media freedom and pluralism through the following measures. See European Commission, European Media Freedom Act (see in particular EU support for free media).

16. See Article 3(6) of Directive (EU) 2015/849.

17. The Media Pluralism Monitor (MPM) is a research project by the Centre for Media Pluralism and Media Freedom at the European University Institute in Florence (Italy) that assesses the health of media ecosystems in Europe, highlighting threats to media pluralism and media freedom in the European Union's member States and candidate countries.

18. In 2025, the MPM underwent significant changes, so that the MPM results for 2025 are not strictly comparable with the results of previous editions.

33. Its key findings are as follows:

– Market Plurality is the EU's most fragile area: both media ownership concentration and digital platform dominance are at very high-risk levels. 18 countries still lack mechanisms to assess the impact of media mergers on pluralism, as requested by the EMFA;

– AI and tech platforms pose new challenges: only a handful of countries report ongoing negotiations with tech firms over fair remuneration for media content they benefit from;

– Journalists face growing threats: online harassment (including deepfakes and AI-driven smear campaigns), SLAPPs, physical intimidation, and surveillance on journalists are increasing, including in Western EU member States;

– Working conditions in journalism are "deplorable": low pay, shrinking job security, and weak social protections make editorial independence highly vulnerable to commercial or political pressure;

– Political capture persists, particularly in Central and Eastern Europe, but not exclusively. Local media are frequently politicised through skewed subsidies or direct ownership;

– Online political advertising is largely unregulated: while electoral broadcast rules are generally sound, online campaign transparency is alarmingly weak across the board, pending the application of the 2024 EU regulation on transparency and targeting of political advertising;

– Despite decades of awareness on the issue, women remain persistently underrepresented in editorial leadership and media governance across the EU, including in countries that otherwise score well. The indicator on gender parity is one of the lowest performing in the entire index, outside of the economic risks.

34. Furthermore, the MPM2025 identifies urgent gaps in institutional readiness, especially among National Regulatory Authorities (NRAs) tasked with upholding new EU digital and media laws. The analysis highlights the need for:

– independent, well-resourced NRAs with political and budgetary autonomy;

– mandatory transparency of media ownership, including beneficial owners;

– levelling the playing field between the media and Big Tech, including regarding AI content use and monetisation;

– assessing the impact of media market concentration on pluralism and editorial independence, introducing rules that fully comply with Art. 22 EMFA;

– sustainable quality media, opposing disinformation;

– robust whistleblower, anti-SLAPP and anti-spyware protections;

– sustainable support for local, minority, and public interest journalism.

5. Particular issues

5.1. Media capture

35. Media capture is an increasingly popular tool of authoritarian and illiberal governments or populist governments for controlling public information. It uses legal means to create economic or regulatory barriers to independent media that limit their ability to generate income, to operate and ultimately to inform the public. It is a deliberate form of media concentration aimed at controlling the flow of news and information.

36. Media capture is intended to force media to serve vested interests of political or economic nature. State-led media capture is an effort by the dominant political force to use various powers or tools of the State to control the media to favour a political interest. In such cases, economic actors and oligarchs act in collusion with this system and benefit from it, but often the balance of power lies with the political interest.

37. There are at least four mechanisms by which media capture operates:

– turning public broadcasters into government mouthpieces;

– capturing and instrumentalising media regulatory bodies through political appointees;

– abusing various State resources, like State advertising;

– distorting the media market via State banks in favour of pro-government media and creating a circle of loyal oligarchs to run private media in the government's interest.

38. Moreover, in many systems of media capture there are private media owners who are not necessarily driving this form of State-led media capture, but nevertheless act in collusion with or benefiting from it.

39. According to the 2025 Annual assessment of press freedom in Europe by the partner organisations of the Safety of Journalists Platform, the Russian Federation, along with Council of Europe member States Hungary and Türkiye, are prominent examples of media capture, with other governments seeking to follow their lead:

– In Russian Federation, Article 19 – a partner of the Platform – along with Radio Free Europe/Radio Liberty (RFE/RL), Moscow Times and SOTA, were all designated “undesirable organisations”, banned from operating in the country and making anyone associated with them face up to six years in prison. In June the Ministry of Foreign Affairs added 81 media outlets from across Europe to an ever-expanding list of banned organisations and journalists in ‘retaliation’ for the European Union’s earlier decision to block four Kremlin-linked propaganda networks from broadcasting in Europe;

– In Belarus, over twenty news sites were blocked on instruction from the Ministry of Information which identified them as ‘extremist’. In March the BelaPAN news agency was formally liquidated by the courts completing the State’s years long campaign against it including the jailing of four BelaPAN journalists in 2022;

– In Türkiye, the broadcast regulator, RTÜK, suspended, fined, then eventually revoked the license of Acık Radyo, after a guest referred to the ‘commemoration of the Armenian genocide’. Acık Radyo, an independent non-profit radio founded in 1995, has long been a symbol of diverse, independent and human rights-centred journalism and its closure, on 16 October 2024, is widely mourned. Numerous news sites and other journalistic content have also been blocked by the courts.

40. Media capture is particularly effective in Central Europe, for example in Hungary, where over the past 15 years the government abused various State tools and regulatory competencies to distort the media market, disrupt free competition and undermine independent media. The bulk of mainstream media and public affairs media is now owned by an effectively government-controlled foundation or by party-allied, party-aligned or party-dependent oligarchs, many of whom had been placed there with the help of loans from State-controlled banks. The remaining independent media faces a deeply uneven playing field, as the government continued to use its economic regulatory and legislative influence to undermine their reach and sustainability while propping up various propaganda voices that they would not be viable without government subsidies. This model is being borrowed by other governments like Poland and Slovak Republic.

41. On 11 December 2025, the European Commission decided to open an infringement procedure[19] against Hungary by sending a letter of formal notice[20] for failing to comply with several provisions under the EMFA and certain requirements under the AVMSD. In particular, Hungary failed to comply with requirements relating to the public service media, the transparency of media ownership, the assessment of media market concentrations and the allocation of State advertising. It is hoped that this infringement procedure and the results of the 2026 national elections will compel the new government to undertake a comprehensive renewal of Hungarian media regulation.[21]

42. A 2025 report[22] by the International Press Institute (IPI) and the Media and Journalism Research Center (MJRC) provides a comparative assessment of media capture across seven EU member States (Bulgaria, Greece, Hungary, Poland, Romania, Slovak Republic, and Finland) and the legal frameworks in place to protect media pluralism and editorial independence. The reports focus on the four key elements of media capture as addressed by the EMFA:

– independence of NRAs;

– independence of public service media;

– misuse of State funds to influence media output;

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19. See https://digital-strategy.ec.europa.eu/en/news/commission-calls-hungary-comply-european-media-freedom-act-and-audiovisual-media-services-directive.
20. INFR(2025)2194.
21. See e.g. Török B., On the Renewal of Media Regulation – Tasks Ahead for Media Legislation and Institutional Culture.
22. See Media Capture Monitoring Report: “Overview – The European Media Freedom Act: The Solution To Capture Or Just Fine Print?”

– media pluralism and political/State influence over news media.

43. According to the report, Public Service Media continue to be at risk and remain vulnerable to political influence, with governance structures failing to ensure editorial independence and a plurality of views. Hungary represents the most extreme case with public media effectively serving as government mouthpieces. Also, the recent change in legal status of the Slovakian public broadcaster from RTVS to STVR enabled the government to replace the management with their own appointees. Media regulatory bodies are increasingly politicised and at risk of falling under government control, with Poland and Hungary having the most politicised NRAs. State advertising is frequently allocated in a non-transparent and discriminatory manner, often favouring pro-government media outlets. Finally, ownership of major media outlets is often overly concentrated among politically connected business elites. This is particularly evident in Hungary, where control over media by government allies dominates the media landscape.

44. The report concludes that, in the absence of clear and detailed provisions, many countries may seek to circumvent the spirit of the EMFA by merely complying with its formal requirements without introducing effective implementation mechanisms. In order to help reduce the incidence of political interference, the report offers the following recommendations:

– Independent NRAs: the European Commission should encourage, and member States should consider, going beyond the minimum legal requirements outlined in EU law and introducing mechanisms and processes that help ensure the autonomy and effectiveness of the NRAs:
  - introduce strong guarantees of political independence of board members by ensuring no political affiliation and providing a thorough vetting of any potential conflicts of interest that might compromise a nominations independence;
  - distribute the nominations across different political institutions such as the lower and upper houses and the presidency;
  - enable nominations from civil society groups and representatives of media stakeholders;
  - require candidates to have the highest professional qualifications and experience to be able to perform the tasks effectively;
  - introduce staggered rotating terms for the members of the regulatory authorities, differing from the terms of the parliament;
  - introduce mechanisms to ensure voice of opposition parties in the nomination process for example by requiring any parliamentary vote on nominations to have a supermajority of, for example, 60% or more, or by reserving places to be nominated by the smaller parties;
  - require NRAs to take decisions as a board with major decisions on licensing and penalties, also requiring a supermajority;
  - require boards to ensure full transparency around the decisions and their justifications, including considering live-broadcasting sessions;
  - establish independent mechanisms (e.g. with the participation of NGOs or professional groups) to monitor the activities of the regulatory authority;
– Independent public service media: the same principles behind the above recommendations for the establishment of independent NRAs should apply to the establishment of independent governing bodies of public service media (PSM). Regarding funding, PSM must provide budgets that are adequate, sustainable and predictable, as well as independent of political influence Independent monitoring mechanisms must be established to oversee the performance of the public service media and the work of their governing bodies to ensure they meet their public service mandate (see below the section on PSM);
– Misuse of State funds to influence media output: the implementation of effective guidelines and best practices can help to minimize risks. In order to strengthen transparency of distribution of State advertising and State funds the following is recommended:
  - the rules should apply to all levels of government including local governments regardless of the size of population;
  - the transparency rules should apply to all intermediaries involved in the disbursement of State funds including advertising agencies and media sales houses;

- the monitoring should encompass all forms of funding including subscriptions purchased by State bodies;
- cumulative spending should be included as a criterion for the selection of media companies with a threshold beyond which no further funds can be distributed without a tender process;
- media service providers should be obliged to clearly label all State funded advertisements (and other content);
- the institution designated to monitor the distribution of State advertising should be sufficiently empowered to obtain the necessary information to ensure State bodies are fully compliant in their transparency obligations;
- media stakeholders and civil society should be consulted on the development of the guidelines for distribution and the methodology for their application, as well as in monitoring and assessing the application of the rules;
- governments should provide full transparency on all public tender contracts that are awarded to companies that fall in the same business grouping as national media service providers;

– Media pluralism and political/State influence over news media: the European Commission, assisted by the European Board for Media Services, should develop guidance on a consistent and practical methodology for assessing media pluralism and identifying the necessary safeguards to protect media pluralism such as ownership thresholds and guarantees of editorial independence. Representatives of media stakeholders should be consulted on building the required methodology and in reviewing the application of its rules. The methodology should include:

- cross-ownership limits extended to beneficial owners as well as the official companies that own media assets;
- a concept of dominant position that aligns with the realities of the national media market;
- a set of disqualification criteria designed to prevent companies that receive significant public procurement funding from simultaneously owning media assets (or vice versa).

5.2. Focus on public service media

45. Most Council of Europe member States have established legal frameworks for public service media, but significant gaps remain, in particular, regarding procedures for the appointment and dismissal of governing bodies, the protection of editorial autonomy and the stability of funding arrangements.

46. In a report from July 2025,[23] Reporters without Borders (RSF) explain that Europe's public service media are experiencing a series of crises: their funding is regularly called into question, digital platforms are affecting their relationship with information, they can easily be turned into government mouthpieces or propaganda tools, and more in general there is a crisis of public trust in these media. The report highlights the following issues:

– In more than half of EU member countries, there is pressure on the public media, mostly of political nature.

– Public service media groups are often criticised for being too expensive. The broadcast licence fee is often the target of choice when it comes to lowering taxes. When the licence fee is replaced by funding from the State budget, the public media budget falls by around 9 per cent, whereas it rises when the licence fee is reformed (+14 per cent) or replaced by an earmarked tax (+9 per cent).

47. RSF makes the following proposals:

– ensuring there are strong guarantees for independence in the appointment process for public service media leadership, which should include the participation of civil society;

– developing common practices for monitoring the “internal pluralism” of public service media among European NRAs;

– creating an independent body to assess the financial needs of public service media and the establishment of a multiannual funding plan;

– investigating a system of funding public media via a tax on digital platforms;

23. See https://rsf.org/en/rsf-publishes-new-report-protect-europe-s-public-media.

– implementing policies to open newsrooms up to the public, including the introduction of a "Media Day" on 3 May, which is World Press Freedom Day;

– establishing pan-European international broadcasting by working with a combination of European actors in the sector, including Radio Free Europe/Radio Liberty.

48. The systemic alerts[24] published by the Partner Organisations of the Safety of Journalists Platform regarding public service media in Azerbaijan, Bosnia and Herzegovina, Georgia, Hungary, Slovak Republic, Türkiye, Belarus, and the Russian Federation[25] underline the need for:

– clear legal guarantees of institutional and editorial independence;

– transparent, merit-based and depoliticised appointment procedures;

– adequate, predictable and politically independent funding mechanisms;

– transparency and accountability in governance and decision-making, including open procedures for appointments and the use of public funds.

5.3. News deserts

49. The European Federation of Journalists (EFJ) with a consortium of partners, the Centre for Media Pluralism and Media Freedom (CMPF), International Media Support (IMS) and Journalismfund.eu launched the project “Local Media for Democracy” to help struggling local, regional and community media in the news desert areas in Europe by providing financial support and organisational capacity building. The project started on 1 February 2023 and developed over a period of 18 months. The project was co-funded by the European Union.

50. This project resulted in a 2024 report titled “Uncovering news deserts in Europe”[26] focusing on detecting challenges and opportunities for local and community media and identifying news deserts in the 27 EU member States. According to the report, the very existence of local, regional and community media has become uncertain in many areas of the European Union.

51. The report interprets the concept of news desert in a holistic way as “an area that is lacking sufficient, reliable and diverse information from trustworthy media sources”. It assesses the risk for local and community media through several indicators related to the number of media outlets, economic and political conditions, as well as the degree of safety of local journalists and the social inclusiveness of local and community media towards minorities, marginalised communities and the capability of engaging with the audience.

52. The report identified examples of best innovative practices in the local and community media sector that could be deemed beneficial for a vibrant and open public sphere. It investigated whether news media organisations are experimenting with innovative responses to improve reach and audience, proposing new forms of work, journalistic products or services, and whether there are citizen or civil society initiatives providing innovative responses to tackle the problem posed by the decline of local and community news provision.

53. Local media markets in each EU member State have their own the complexities and specificities. In some countries, the problematic applies to the entire country, while in others, it is limited to specific regions or even cities in which certain communities are left without access to local media that disseminate public interest information. Political and commercial control over local media is mostly affecting areas of Central and Southeastern Europe (CEE and SEE).

54. The situation concerning news services in rural areas is becoming increasingly problematic. This is due to a combination of factors, including issues related to distribution and a decreasing number of points of sale. These issues are exacerbated by the ongoing digital shift and the ageing of the rural population. Moreover, there is an increasing centralisation of newsrooms and journalists in major regional cities, with limited reach to remote areas and a shift towards desk-based journalism.

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24. Since September 2024, the Partner Organisations of the Safety of Journalists Platform supplement their alerts documenting serious threats to the safety of journalists and media freedom in Europe with a new category that highlights systemic issues to media freedom, i.e structural issues identified by the Partner Organisations as having a chilling effect on media freedom and journalists’ safety in the member States. The systemic alerts are issued when at least five Partner Organisations endorse them.
25. See Partner Organisations of the Safety of Journalists Platform publish a new set of systemic alerts on threats to public service media.
26. See European University Institute, *op.cit.*

55. The editorial independence of local and community media is challenged by the intertwining of two factors: a decrease in advertising revenues, and a biased allocation of State advertising and subsidies to local media (see above the section on media capture). Moreover, the digital transition and the unwillingness of the audience to pay for news exacerbates the challenges to the sustainability for local and community media across the EU.

56. Local journalists suffer from unsatisfactory working conditions (especially freelancers and self-employed journalists) and increasing online attacks against them.

57. The coverage of marginalised groups, such as women, the LGBT+ community, the elderly, and people with disabilities is particularly problematic due to their specific/smaller audience, and little research has been conducted in many EU countries on this topic.

58. Many of the best practices observed in the report are focused on improving news quality and regaining reader's attention and trust. This means offering news in different formats – formats that are "slower", more in-depth – and a news production that is eventually more community-focused and network-oriented:

– Email newsletters have become popular to avoid being locked into the ecosystems of social media as well as to regain a gatekeeping power. They offer a high degree of targeting, curated content, distraction-free analysis and commentaries, and are a useful tool to engage audiences, regain their trust and encourage new subscriptions. Their success shows that there is room to compete with mainstream social media by leveraging their limitations, such as a lack of control over personalisation, attention-grabbing strategies, and questionable privacy protections.

  Examples: Viernull (Germany), InsideStory (Greece), and Nyomtassteis (Hungary).

– Podcasts are considered a more active process where listeners demonstrate a greater degree of engagement and can be consumed at a comfortable pace, as a form of "slow media", which creates a personal connection between the hosts and listeners. At the same time, however, they can also create a "sense of collectivity" by allowing recommendations and sharing among users. Podcasts are particularly attractive to audiences which are seeking a more deliberate, mindful, and meaningful media experience.

  Examples: Viernull (Germany), Kulturpunkt (Croatia).

– Involvement in public interest activities that eventually have a social impact is rewarding for local media due to their proximity to the issues and communities they cover. Particularly meaningful local media initiatives for social inclusion are the so-called "street newspapers" sold by people experiencing social forms of marginalisation.

  Example: Kralji ulice (Slovenia)

– Transnational networking and co-operation can also be considered a best practice.

  Examples: International Network of Street Newspapers, InLeaks.

– Alternative funding methods include subscriptions' models and grant opportunities offered by national governments, the European Commission or other institutions.

  Examples: InsideStory, Viernull, podcasts (subscriptions), Spot On Stories (Netherlands, grants).

– Using online channels to reach audiences is a successful practice for local news media but can have undesirable consequences. The economic incentives and logics of social media platforms may, for example, indeed influence or even drive editorial decision-making at local news outlets.[27]

59. Due to its public interest remit, public service media is crucial in guaranteeing an adequate coverage of regional and local areas, both geographically, and in terms of offering services in minority languages.

27. See "The ambivalent and ambiguous role of social media in news desertification" – Centre for Media Pluralism and Media Freedom.

6. Media pluralism in the age of social media and artificial intelligence

60. As previously stated, online platforms owned by major technology companies have evolved into influential intermediaries with the ability to control access to content, allowing to determine not only which content is available but also its visibility and findability, resulting in significant power imbalances between platforms, media and the State.

61. Regarding the visibility and findability of content in the online environment, the European Commission has commissioned a study[28] which examines how European cultural content is discovered and accessed in today's digital environment. The report explains that efforts for safeguarding cultural and linguistic diversity online have traditionally focused on supporting the production and availability of diverse cultural content, but nowadays being available is no longer enough: discoverability has become the next critical frontier.

62. The report contains the following recommendations:

– Foster collaboration and governance for fair discoverability through the establishment of an EU multi-stakeholder forum, by integrating discoverability into EU and national cultural strategies, and by promoting cross-sector partnerships to address issues such as transparency, metadata, and data access.

– Enhance data collaboration and knowledge for better discoverability by strengthening cultural data collection through the forthcoming EU Cultural Data Hub, developing consistent definitions of "European works," improving metadata standards, and undertaking regular consumer surveys on cultural consumption and discovery.

– Build digital capacity and tools for creators and cultural organisations: training programmes, peer-learning networks, and practical tools (including AI-assisted metadata solutions) should help cultural actors promote their work more effectively in digital environments.

– Audience-focused measures such as strengthening digital and AI literacy, running awareness campaigns on European cultural diversity, engaging young audiences, improving access for linguistic minorities, and supporting digital inclusion for older users.

– Accelerating research and innovation for discoverability by supporting R&I initiatives on fair and diverse recommendation systems, studying the impact of AI-generated content, and developing tools to improve transparency and auditability of algorithms.

– Bolstering European content supply by expanding funding for translation and localisation, supporting curated cultural showcases, exploring prominence mechanisms for European works, increasing algorithmic transparency for creators and users, and ensuring authenticity in an era of AI-generated content.

63. As regard the gatekeeping power of Big Tech companies, smart TVs and their operating systems have become a new battlefield. Connected TV operating systems are rapidly becoming a central access point to auto-visual content. For a growing number of European citizens, a television set is no longer just a receiver of broadcast channels, but rather a main gateway to information, to culture and entertainment in the home. Increasingly, access to that content is mediated not by traditional broadcasters but by platform control interfaces. Connected TV operating systems have quietly become one of the most powerful gatekeepers in the media value chain.

64. The EU connected TV operating system market has become more concentrated around large ecosystem platforms like Android TV, Amazon Fire or Samsung's operating system. A limited number of operators have gained the ability to shape the availability and discoverability of content by controlling access to audiences and content distribution. When a small number of global players control the TV operating system, the main user interface, the recommendation logic, the advertising infrastructure, and in many cases, their own competing content services, they became structural gatekeepers between media providers and audiences. Connected TVs amplify this gatekeeping power because switching costs are very high (TV sets are replaced every 7 to 10 years) and because there are very few alternative access routes, and because TV interfaces increasingly aggregate content across services. This means that decisions about content prominence and ranking had a direct and immediate impact on audience rates.

28. See "Study on the discoverability of diverse European cultural content in the digital environment".

65. This issue matters because pluralism today depended not only on who produces the content, but on who controls access to it. When visibility is mediated by a single interface, a single assistant, or a single recommendation logic, editorial choices can be influenced by the platforms, and economic dependence on gatekeepers increases. This represents a new form of concentration, one that existing media ownership rules is not assigned to address. Connected TV operating systems now perform roles functionally comparable to all the regulated platform services, but they had until very recently received far less regulatory attention.

66. In an open letter to the European Commission,[29] the main European broadcasting associations call on the European Commission, in the framework of the DMA, to:

– designate major connected TV operating systems and virtual assistant providers as gatekeepers;

– if allegedly none of them meet the quantitative thresholds, to open a market investigation on the basis of the qualitative thresholds (Article 3(8));

– review the definition of "business users" for the purpose of designating VAs as gatekeepers, in the context of the ongoing review of the DMA. The definition must be interpreted broadly, applied in a technology-neutral manner, and encompass all entities that significantly rely on the VAs platform to reach end users.

67. Indeed, the EU already has relevant regulatory tools, such as the DMA, the DSA, and the EMFA, which can be applied against structural gatekeeping power. As an example of this, in September 2025, an alliance of NGOs, trade associations and organisations from the media industry lodged a formal complaint with the German *Bundesnetzagentur* (Federal Network Agency), in its capacity as Digital Services Co-ordinator (DSC), against Google's AI Overviews. The signatories argue that by integrating AI-generated answers (so-called Google AI Overviews) into its search results, Google is breaching key provisions of the DSA – with serious consequences for media diversity, freedom of expression and democratic discourse.[30] Later, on 9 December 2025, the European Commission announced the opening of a formal antitrust investigation to assess whether Google had breached EU competition rules by using the content of web publishers, as well as content uploaded on the online video-sharing platform YouTube, for AI purposes.[31]

68. In the AI field, so-called Generative Artificial Intelligence (GenAI) applications pose new and significant challenges to media and information pluralism. In its Guidance Note on the Implications of Generative Artificial Intelligence for Freedom of Expression,[32] the Council of Europe Steering Committee on Media and Information Society (CDMSI) states that Generative AI-powered services are increasingly becoming a gateway to information and can have a direct impact on the visibility and economic viability of journalism as well as on 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.

69. While GenAI has the potential to engender efficiency gains in the media sector (improving processes within media companies and supporting journalistic research, documentation, and analysis), it is imperative that Generative AI remains under human editorial control, given the risks it carries. GenAI models trained on incomplete or biased datasets may exacerbate existing biases and undermine the diversity of editorial voices, viewpoints, formats, and sources available to the public, thereby undermining media and information pluralism. The opinions and ideas supported by the owners of Generative AI tools and products may also be amplified, which could have consequences for editorial independence and source diversity. Moreover, the use of GenAI-based augmented search applications as information sources established new intermediaries between the media and their audiences and may disrupt the reach and economic viability of the media, and the use of copyrighted material as input, for training, and in the outputs generated by AI could diminish the business model and economic sustainability of journalism, as well as other creative industries (see above). Finally, the one-to-one communication existing between GenAI systems and its users has the potential to create a "bubble of one", where individuals are fed by personalised streams of information that reinforce existing personal beliefs and biases, even misperceptions, diluting thereby the very core notion of a shared and pluralistic information space is diluted. This holds a risk of making individuals more vulnerable to

29. See www.acte.be/publication/european-broadcasting-associations-statement-on-connected-tvs-virtual-assistants/.
30. See www.bdzv.de/service/presse/pressemitteilungen/2025/eine-allianz-aus-ngos-verbaenden-und-organisationen-der-medien-und-digitalwirtschaft-reicht-dsa-beschwerde-gegen-googles-ai-overviews-ein.
31. See https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2964.
32. Guidance Note on the Implications of Generative Artificial Intelligence for Freedom of Expression, Adopted by the Council of Europe Steering Committee on Media and Information Society (CDMSI) at its 28th Plenary meeting, 3-5 December 2025.

manipulation and less likely to agree on basic facts, ultimately having an impact on the freedom to receive information and to hold an opinion. In the long term, it can exacerbate the ongoing process of societal fragmentation of the informational space and polarisation.

70. According to the recommendations included in the Guidance Note, member States should take proactive steps to ensure that Generative AI applications, their design and use uphold and promote freedom of expression while mitigating potential risks. They are divided into four action areas:

i. Observe the impact of Generative AI applications and technology on freedom of expression through proportionate oversight and testing mechanisms evaluating its potential positive and negative effects. This approach will enable transparency measures, help identify biases and foster responsible data governance and accountability.

ii. Assess Generative AI systems through ongoing risk and impact assessments including systematic, tailored, use case-specific and inclusive freedom of expression impact assessments and due diligence in public procurement.

iii. Enable the full exercise and protection of the right to freedom of expression, including strengthening socio-technical standards, which apply a methodological approach to safeguard against human and societal impacts of technology through technical specifications and processes.

iv. Empower relevant stakeholders, such as States, private sector, academic and civil society actors, commercial end-users and individuals, by adopting a wide range of measures aimed at awareness-raising and participatory approaches to governance (including citizens' assemblies), education, research, publication of risk and impact assessment findings, facilitating user choice and other international co-operative approaches.

7. Conclusions

71. The independence of the media and media pluralism are under threat from increasing editorial control of the media sector by political and economic actors (so-called 'media capture'), mounting pressure against public service media, the emergence of 'news deserts', and intensifying competition and market dominance from online platforms. These growing threats require a swift and decisive response from governments, legislators, and regulatory authorities.

72. Mergers and acquisitions in the media sector should be assessed according to their impact on media independence and pluralism.

73. Transparency of media ownership can be helpful in making media pluralism effective by bringing ownership structures behind the media – which can influence editorial policies – to the awareness of the public and regulatory authorities.

74. The editorial independence of the media must be protected at all costs, and the governance and financing of public service media must be properly regulated as to avoid political interference.

75. Effective measures should be taken to avoid the capture of the media sector by political and financial actors for the purposes of controlling public information, concealing critical voices and manipulating public opinion.

76. Media regulatory authorities must be independent, both in principle and in practice, and have adequate financial resources to fulfil their role. Their decisions must be objective, justified, transparent, non-discriminatory, proportional, and subject to appeal before an independent appellate body.

77. Journalists must be able to work safely without fear or undue restrictions.

78. The emergence of "news deserts" must be counteracted by bespoke measures, and public support for local media be transparent and fair in allocating resources, including State advertising, in order to avoid media capture and threats to media independence in general. The lack of data related to the economic and financial information for both local and community media must be urgently addressed.

79. It is vital that services of general interest, and in particular public service media, are given appropriate prominence on online platforms and TV interfaces.

80. Appropriate measures should be applied so that connected TVs & virtual assistants do not become gatekeepers with the power to determine which content is prioritised on our screens.

81. Drawing upon these conclusions, I propose a set of concrete measures in the draft resolution.

Appendix – Dissenting opinion presented by Ms Zeynep Yıldız (Türkiye, NR), member of the Committee on Culture, Science, Education and Media, pursuant to Rule 50.4 of the Rules of Procedure

1. While welcoming the report and recognising its valuable contribution to the discussion on media pluralism, media concentration and the sustainability of independent journalism, I wish to express reservations regarding certain references to Türkiye contained in the explanatory memorandum. In my view, these assessments do not fully reflect the broader legal, institutional and societal context in which media-related policies and regulatory measures are implemented.

2. Türkiye, like many Council of Europe member States, faces complex challenges stemming from terrorist threats, rapid digital transformation, disinformation, and the evolving nature of online communication. In responding to these challenges, the authorities seek to preserve a careful balance between the protection of freedom of expression and freedom of the press and the legitimate requirements of public order, national security and the protection of the rights of others. Journalism cannot be used as a shield against criminal liability. References to “imprisoned journalists” may be misleading where the proceedings concern alleged criminal offences rather than journalistic activities. Such cases are assessed by independent courts in accordance with due process and fair trial guarantees.

3. I also believe that the characterisation of Türkiye as an example of “media capture” does not adequately take into account the diversity and dynamism of the country’s media landscape. Türkiye continues to host a wide range of media outlets representing different political, ideological and social perspectives. Numerous media organisations openly scrutinise and criticise government policies and political actors and continue to reach broad audiences. While challenges undoubtedly remain, the existence of a vibrant and pluralistic media environment should also be duly recognised.

4. Furthermore, references to interventions concerning certain media outlets would benefit from a more comprehensive presentation of the relevant legal and factual circumstances. Measures taken against media organisations are not based on their political orientation or editorial stance, but are linked to legal processes concerning unlawful activities established by competent authorities or to insolvency-related procedures carried out in accordance with applicable legislation.

5. With regard to the case of Açık Radyo, in my opinion, the explanatory memorandum does not sufficiently reflect the legal and procedural aspects of the matter. The measures adopted by the Radio and Television Supreme Council (RTÜK) were not based solely on the mention of a commemorative event, but arose from concerns regarding the use of terminology relating to the events of 1915 in a manner considered inconsistent with the applicable regulatory framework. Moreover, the revocation of the broadcasting licence followed a graduated administrative process, including prior sanctions and a programme suspension, and was ultimately linked to non-compliance with regulatory decisions. As with all administrative measures, these decisions remain subject to judicial review.

6. In conclusion, while supporting the overall objectives of the report, I respectfully submit this dissenting opinion that would hopefully lead to a more nuanced and contextualised text which consequently would contribute to a fuller understanding of the media environment in Türkiye.