Policy Papers for Different Stakeholders

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DELIVERABLE 1.7

MeDeMAP – Mapping Media for Future Democracies

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Preface

The final part of task 1.2 of work package 1 is to translate some key MeDeMAP research findings into recommendations for relevant stakeholders. According to the MeDeMAP proposal (Grant Agreement, Part A, p. 21), the policy papers should address

(1.) good practices in guaranteeing media freedom and plurality, transparency and political independence of media production, ethical standards, editorial processes, internal accountability and governance structures,

(2.) political and self-regulatory measures to promote social diversity in management and newsrooms and to strengthen specific forms of democratic journalism (such as fact-checking, investigative and participatory journalism),

(3.) policy recommendations for PSM, commercial and non-profit media according to four areas of recommendations: transparency, legal incentives, editorial incentives and structural incentives,

(4.) recommendations for media industry and media houses how to establish audience research approaches that take into account the changing information and communication behaviour of media users and, above all, their different participation needs.

The first paper was to be addressed to policymakers, with UNESCO named as a possible recipient (Grant Agreement, Part B, p. 25). In fact, close cooperation with UNESCO Austria developed during the MeDeMAP project, reflected in invitations to the editor of this deliverable to UNESCO roundtables and a joint, highly acclaimed conference, "The Future is Public," in November 2025. *Policy Paper 1* is therefore dedicated to UNESCO in recognition of its global struggle for the democratisation of media since the 1970s, and underpins its media policy approach with MeDeMAP research findings.

The second paper was intended to focus on media and journalism, with the associated keywords primarily relating to journalism. Strengthening independent and diverse journalistic media has always been a particular concern of MeDeMAP. It was therefore a great pleasure that the European Federation of Journalists (EFJ) was represented by Director Renate

Schroeder at the impact workshops both at the start of the project in Vienna and at its conclusion in Brussels. *Policy Paper 2* is therefore dedicated to the EFJ—and, of course, all other journalism organisations—and outlines a number of suggestions derived from the project's research aimed at strengthening democratically relevant journalism in a time of multiple crises.

Among the media outlets named in the project proposal as the target group for the third paper, the choice fell on public service media, to which the *European Media Freedom Act* attributes great importance in ensuring a democratic public sphere. This project involved close cooperation with the Austrian public service broadcaster ORF, which invited us to apply the MeDeMAP concept to a study on improving the representation and participation of people at risk of poverty in the media, and to discuss the journalistic requirements of different concepts of democratic participation at a roundtable with representatives of the European Broadcasting Union. *Policy Paper 3* is aimed at PSMs.

The fourth paper should deal with audience research approaches. One of the most important recommendations for "future democracies" made by the citizens' parliaments in work package 6 is the creation of a safe online communication space that current providers cannot offer. It would be the urgently needed response to the changing information and communication behaviour of media users and, above all, their different democratic participation needs. *Policy Paper 4*, addressed to the European Commission, proposes in detail the development of a 'European Digital Public Space': a federated, sovereign, and democratically governed infrastructure for media distribution, AI-enabled discoverability, and cross-border cooperation. The implementation of this proposal should be at the top of the European media policy agenda.

* * *

After completion of the deliverable, the policy papers compiled here will be sent to the intended recipients as individual publications, which still need to be graphically edited.

MEDEMAP

Policy Paper 1

Traces into the Future. UNESCO's Struggle for a Democratic, Citizen-Centered Media Policy

Josef Seethaler, Gabriele Melischek,
Maren Beaufort and Andreas Schulz-Tomančok

DELIVERABLE 1.7, Part 1

MeDeMAP – Mapping Media for Future Democracies

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Executive Summary

The paper traces **UNESCO's long-standing role in shaping democratic, citizen-centered media policy**, beginning in the 1970s and continuing to the present. It situates UNESCO's work within a period of profound technological and social change, when scholars and policymakers began to understand **media** not merely as channels of information, but **as powerful actor that is shaped and shapes societies' cultural environment and, thus, being able to support or subvert democracy**. Early collaborations with academia, especially around concepts such as *cultural indicators*, have laid the groundwork for UNESCO's distinctive, comprehensive, long-term, evidence-based approach to media policy. Even though the cultural aspect has recently moved into the background, its focus on the interdependence between structure and agency has nevertheless placed the role of individuals not only as mere recipients of media messages but also as active users—and active citizens—at the center of its policy.

In recent times, UNESCO has refined its approach through **specialized indicator frameworks**, including Media Development Indicators, Gender Sensitivity Indicators, Journalists' Safety Indicators, and Internet Universality Indicators. These frameworks are based on

- the conception of media's "dual role" as a **space for information exchange, democratic debate and cultural expression**, and an **independent social actor that monitors power and holds governments and institutions accountable**;
- and the conviction that **media independence** depends not only on the absence of state interference, but also the extent to which **all members of society—especially marginalized groups—can access media, participate, and make their voices heard**. Enduring barriers such as the widespread "top-down-communication" in non-participatory-oriented journalism, and a lack of opportunities for people to become familiar with media practices, be it due to poverty, education, language, and other socio-economic divides, have made journalistic training programmes and programmes of media and information literacy as central concerns. Empirical evidence from the MeDeMAP project supports this approach.

The paper argues that a public advocate for citizens' interests is urgently needed, as they remain insufficiently recognized in media law and policy and (too) often treated as passive recipients rather than active participants.

Drawing on UNESCO documents and European citizen consultations, the paper proposes a **three-stage model** for strengthening democratic media systems:

- broad and informed **access** to media, especially potentially participatory forms such as public service, community and online media—whereby the latter are to undergo regulatory measures to become "safe online spaces";

- Fair **representation** of social diversity, without shying away from conflicting perspectives, but rather integrating them into a societal dialogue that follows democratic principles;
- and low-threshold opportunities for active **participation** supported by capacity building measures to acquire "media agency" (as a next step to having the skills to critically engage with media, which is usually called "media literacy".

This leads to a renewed call to reconsider a **"right to communicate"**, first promoted by the *MacBride Report*, published by UNESCO in 1980, which integrates the rights to speak, to receive information, *and* to participate meaningfully in public discourse, thereby having an impact on democratic political decision-making processes.

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1. A Long History of Expertise in Media Policy

"The messages and images that surround us form a symbolic cultural environment [to a great extent conveyed by the media] that both reflects and reproduces the ways we think about the world. The symbolic environment reveals social and institutional dynamics, and because it expresses cultural patterns, it also cultivates them."[1]

A "Cultural Revolution"

During the 1970s, the students at the Annenberg School of Communications at the University of Pennsylvania frequently encountered the term 'culture' in the titles of textbooks such as *Mass Culture Revisited* (1971)[2], *Communication Technology and Social Policy: Understanding the New 'Cultural Revolution'* (1973)[3] and *Mass Media Policies in Changing Cultures* (1977)[4]. What had happened? Technological change.

Paul Lazarsfeld, in his introduction to *Mass Culture Revisited*, saw—like many others—signs of a new technological revolution, with developments such as cable television, satellites, and cassettes, the consequences of which no one could really predict. In view of this dramatic media change, the question of its possible *social* impact became the focus of media and communication research, which, according to Denis McQuail, underwent "a shift toward long-term social change and cultural patterns" between the 1960s and 1980s.[5]

Cultural Indicators

In response to the perceived 'cultural revolution', some researchers, such as George Gerbner, dean of the Annenberg School for Communication, argued that mass production and the rapid circulation of messages generate and reinforce symbolic environments that reflect the structures and functions of the institutions responsible for their transmission. These institutionalized, corporately managed message systems override other networks of social communication and impose their own forms of collective consciousness, effectively reshaping existing social relationships.[6] Based on Frankfurt School's thinking and close to Gramsci's 'cultural hegemony', Gerbner's 'cultivation' approach is "a theory on the power of culture over

larger social aggregates at the macro-level, and not about how people think or behave."[7] Regardless of how individuals understand and process messages, they only have an impact on society through the "fact that any attention and understanding cultivated the terms upon which it is achieved".[8] Therefore, 'cultivation analysis' must be preceded by an 'institutional process analysis' and a 'message system analysis' to understand the process that creates the symbolic cultural environment from which behavior derives its distinctively significance. Obviously, the combination of all three research strands requires long-term and comparative analysis, as exemplified by the *Cultural Indicators Project* initiated by Gerbner in 1968 and co-funded by UNESCO, which is considered the "longest running scholarly media research program ever conducted".[9]

The Beginnings

In the closing chapter, with the telling title "Research in forbidden territory," published in the 1973 anthology on *Communication Technology and Social Policy*, James Halloran cites a 1971 UNESCO *Proposal for an International Programme of Communication Research*.[10] This paper outlines a "long-term" and "cross-cultural comparative" program to "study the role and effects of the media of mass communication in modern society".[11] The starting signal for this proposal was a resolution of the UNESCO General Conference in November 1970, based on a pre-decision made two years earlier. Following the self-imposed objective of "problem and policy-oriented"[12] research, the proposal provides a "suggestive rather than comprehensive" list of indicators organized into three parts: production and distribution systems, contents of the products, and consumption and use. This structure strongly resembles the 'Cultural Indicators' concept, published in 1970, and like that, it was aimed at long-term comparative research and the "whole communication process"[13].

Contrary to Gerbner, this process includes, from UNESCO's perspective, a more active audience, as people are expected "to select from what is offered and use what they select in terms of their different needs and situations". This focus "on the relationship between media-generated culture on the one hand and the various situationally based cultures on the other"[14] was in line with other contemporarily discussed approaches, such as Stuart Hall's. While acknowledging the existence of a dominant "pattern of 'preferred readings'," which "both have the institutional/political/ideological order imprinted in them, and have themselves become institutionalized", Hall insists that people can nevertheless play an active role in decoding media messages as in doing so they rely on their own sociocultural milieus—and it is these decoded meanings that might have any effect.[15] Interestingly, this kind of decoding is, however, not

included in UNESCO's first version of an inventory of indicators for analysing the "communication process in general within the wider social, political and economic setting"[16].

A Programmatic Peak

The exchange between UNESCO and academia continued, with independent researchers representing the 'Third Voice' (as Gerbner called it) in addition to media policy and the media industry, to build "a continuing and cumulative factual basis for judgement and policy".[17] An outstanding activity in this regard is the 1977 established *International Commission for the Study of Communication Problems*, chaired by Irish Nobel laureate Seán MacBride and including 16 members from diverse regions and backgrounds. The Commission's 1980 report, *Many Voices, One World*[18], became the fundamental document for the 'New World Information and Communication Order (NWICO)', promoted by UNESCO since the mid-1970s. However, Western opposition, particularly from the U.S. and UK, led to a funding crisis and the eventual sidelining of NWICO by the end of the 1980s. While NWICO as a formal international agenda has faded, the 'International Programme for the Development of Communication', founded in 1980, still lives on. NWICO's core concerns—democratisation, decolonisation, de-monopolisation, and the building of communication infrastructures and capacities in developing countries—entered into academic discourse from the outset, for example, at the 1980 international conference 'World Communications: Decisions for the Eighties' at the Annenberg School of Communication, and have remained central to contemporary debates about the future of the information society. The movement's legacy endures in ongoing struggles for a more just, inclusive, and pluralistic global media order.

A Framework for Cultural Statistics

Even when the 1971 inventory of indicators for a comparative long-term analysis of communication processes was not immediately followed by another, UNESCO's efforts to develop indicators based on cultural statistics continued—again, in exchange with research.

In 1982, UNESCO sponsored the 'Symposium on Cultural Indicators for the Comparative Study of Culture,' which was held at the Austrian Academy of Sciences in Vienna. The conference provided a forum for representatives of various methodological approaches and theoretical perspectives in cultural indicators research, developed within distinct research traditions across countries. Participants were concerned with developing reliable methods for measuring culture and cultural change using indicators. The results[19] were ultimately

incorporated into UNESCO's subsequent activities, as documented at another expert meeting in Vienna in 1986.[20] In the same year, the *Framework for Cultural Statistics* (FCS) was published.[21]

The design of the first version of FSC was based on four main considerations: it should integrate the social and economic aspects of cultural phenomena; as component of the UN Framework of Social and Demographic Statistics, it should be possible to link it to related statistical systems; it should enable international comparisons; and, after all, it should serve the needs for planning and controlling with regard cultural policy matters—and for this purpose, indicators are needed as suitable tools.[22] The long road to get there began with a UNESCO conference in Helsinki in 1972.[23] The decisive phase in the European context began with a meeting in Vienna in 1979,[24] at which joint study groups were set up to develop the statistical requirements for various cultural domains, including print, radio, and audiovisual media (in 2009, supplemented by interactive media).

Building on several meetings and three discussion papers[25], the former areas of creation and production, transmission and distribution, and reception and consumption have been supplemented by registration and storage (a first step toward preserving cultural heritage)—and participation. It seems that the discussion that had remained inconclusive in 1971 was now taken up again, and moreover, with a distinction between 'passive' and 'active' participation, the latter including, for example, facilities for amateurs to make and record video and radio programs.[26] However, UNESCO complained as early as 1986 that some subcategories of creation and participation in the media sector had to be eliminated "due to the lack of pertinent data".[27] Unfortunately, this trend continued. In media and communication studies, research has shifted from a macro to a micro perspective, primarily examining short-term effects of media messages on attitudes or behaviours.

Cultural Diversity

This first version of FSC had been in place for a long time, and it was not until 2009 that a revised version,[28] was published, which—in response to criticism of the first version—considered the needs of developing countries: "Since 1986 [when FSC was published for the first time; authors' note], a very significant development has been the growing awareness of, and need for, active policy on cultural diversity."[29] This development was already evident in the 2005 UNESCO *Convention on the Protection and Promotion of the Diversity of Cultural Expressions*,[30] which reaffirms many of the principles of the 2001 UNESCO *Universal Declaration on Cultural Diversity*.[31] Unfortunately, the broader participation definition in FSC 1986 was reduced to the (former) passive form rather than expanded in light of the emphasized

importance of cultural diversity. In the most recent version from 2025, media play only a very minor role.[32] This marked the end of a long tradition of integrating media and public communication in the analysis of the cultural environment. But it lives on in the close bond between media, public communication and cultural diversity.

Current Trends

On the other hand, UNESCO is further broadening and refining its media indicators under the umbrella of its 'International Programme for the Development of Communication'. In 2008, one year before FSC's second version, UNESCO published the *Media Development Indicators* to assess national media development with regard to the "media's contribution to the creation and sustaining of functioning democracies".[33] Based on this framework, indicators for specific topics followed:

- *Framework of Indicators to gauge Gender Sensitivity in Media Operations and Content* (2012)[34]
- *Journalists' Safety Indicators* (2015)[35]
- *Internet Universality Indicators* (2019, 2021, 2023)[36]

Guided by the *Windhoek+30 Declaration on Information as a Public Good*, adopted on World Press Freedom Day 2021[37], UNESCO joined a core group of 13 organisations in publishing *The Media Viability Manifesto*, launched in Brussels in January 2025.[38] And more is yet to come.

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2. UNESCO's Role in Contemporary Media Policy

It is fair to say that UNESCO has played an essential role in—international and national—media policy for several decades. There are three characteristics that make this commitment unique:

(1) recommendations that are aimed at practical application and implementation and are therefore accompanied by clearly defined indicators;
(2) close exchange with academic research;
(3) and an understanding of media that goes beyond the fundamental roles of the media, on which media law is primarily based on.

As described in Part 1, UNESCO's efforts to engage in media policy began in the 1970s. This period is considered to be a watershed period in which political, economic, and social institutions, including the media, as well as the normative assumptions underpinning them, were fundamentally revised.[39] The then-perceived dramatic change in media technologies led to an intensification of macro-level research, embedding media production and use in a broader political, cultural, social and economic context, and calling for "reliable indicators" to link particular patterns of communication with these contexts.[40] UNESCO has been doing this work for more than five decades.

The symbolic environment conveyed by the media was seen as revealing "social and institutional dynamics, and because it expresses cultural patterns, it also cultivates them."[41] This led both to criticism of the dominance of institutionalized, corporately managed patterns *and* to the highlighting of options for resistance and preservation of autonomy, thereby paving the way for examining the implications of the roles of a passive and an active user, which is today more important than ever.

Both aspects—a critical view on the media's power *and* a commitment to the empowerment of people—are prevalent in UNESCO's considerations how to set up a media policy strategy:

- "Media organisations have considerable power to shape a society's experience of diversity. The media can report upon the concerns of every group in society and enable diverse groups to access information and entertainment. The media can provide a

platform for every group in society to gain visibility and be heard. Yet the media can also engender suspicion, fear, discrimination and violence by strengthening stereotypes, fostering inter-group tension and excluding certain groups from public discourse."[42]

- Therefore, "media and information literacy" is required to empower "citizens to access, retrieve, understand, evaluate and use, to create as well as share information and media content in all formats, using various tools, in a critical, ethical and effective way, in order to participate and engage in personal, professional and societal activities."[43]

UNESCO' Media Policy Approach

> *"There is widespread recognition that the media has an important role in sustaining and nurturing democracy, good governance and human rights but little consensus about how this is to be done. Part of the tension around this problem is that the media has two overlapping but distinct roles. It is a place where democratic debate happens, where information is exchanged and where cultural expression manifests. But it is also a social actor in its own right, acting as a watchdog over powerful institutions (both public and private) and holding government to account."*[44]

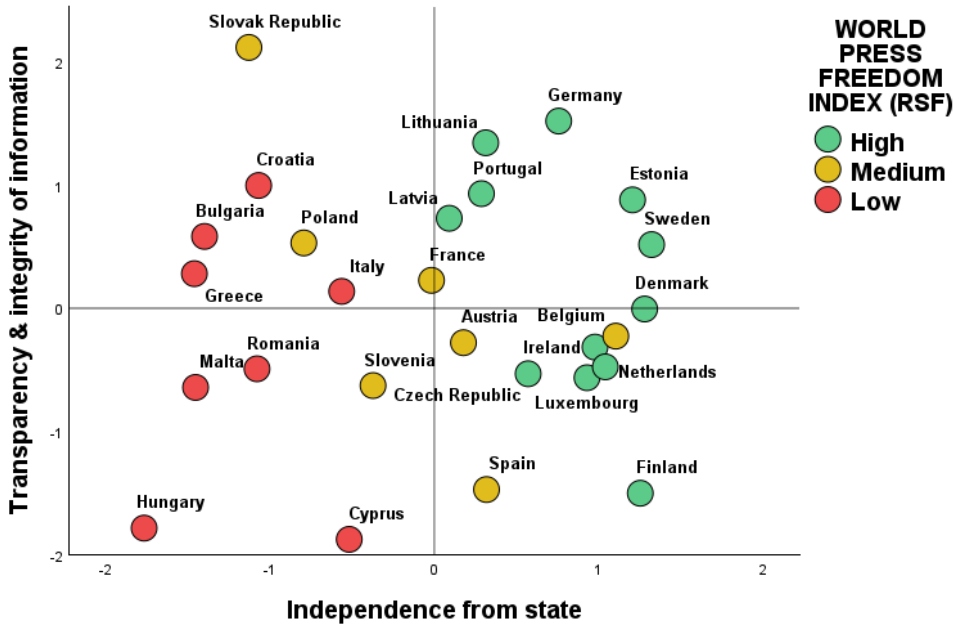
Given this tension, UNESCO concludes that "any attempt to measure media development must embrace issues of both **independence** and **access**." By understanding both issues in a broader sense, it is possible to relate them to each other: independence "is not just the absence of restrictions on the media that matters, but the extent to which all sectors of society, especially the most marginalised, can access the media to gain information *and make their voices heard*. Limited access to—or lack of engagement with—the media is a function of poverty and poor education. It may also be caused or exacerbated by language, gender, age, ethnicity or the urban-rural divide. There is also a need to promote information and media literacy." In short: *Everyone's ability, regardless of any cultural and social identity, to engage with media and make their voices heard determines true media independence.*

We recommend focusing (perhaps more) strongly on this promising approach. It can be confirmed by MeDeMAP results of a value-based analysis of the efficiency of legal and regulatory frameworks in the EU member states, based on secondary data and using principal component analysis.[45]

Empirical Evidence

All countries with high **media freedom** scores have legal provisions that guarantee genuine **independence from the state** in many respects (Figure 1). *Protection of journalists' legal rights and working conditions, such as the right to nondisclosure of sources, the absence of censorship, safeguards against potential encroachments by state authorities, and the right to access information from those authorities, constitutes the indispensable core of media freedom.* This is also evident on the opposite side: a high degree of state dependence restricts media freedom. (The second—and less important—component, encompassing transparency of ownership and integrity of information, while normatively desirable, appears to function as a secondary, inconsistently implemented dimension that does not consistently translate into stronger media freedom. It must, however, be noted that the national implementation of the new transparency rules of the European Media Freedom Act was only to be completed in August 2025, and politics is still struggling with how to deal with disinformation.)

FIGURE 1
MEDIA FREEDOM

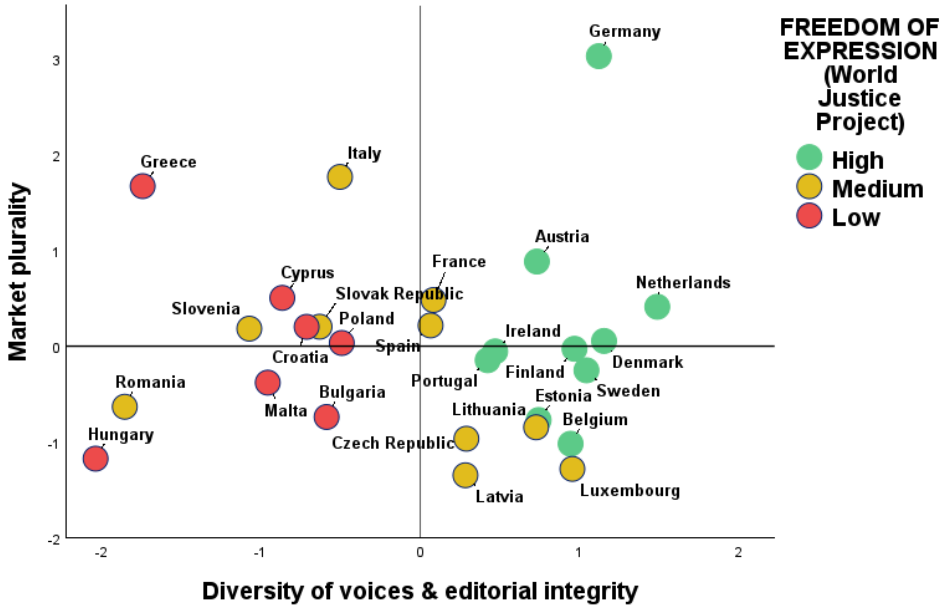


NOTE. PRINCIPAL COMPONENT ANALYSIS INCLUDING NINE VARIABLES; ROTATION METHOD: VARIMAX WITH KAISER NORMALISATION; COMPONENTS WITH EIGENVALUE > 1; LOADINGS > .400; TOTAL EXPLAINED VARIANCE: 71,7%

The **diversity of voices and viewpoints** in traditional and online media markets, ***combined with* editorial integrity,** *i.e., strong self-regulatory instruments to protect editorial autonomy from undue interference by external political and economic pressure groups but also by*

industry-external interests of media owners, especially in public service media, are the most important components guaranteeing **freedom of expression** (Figure 2). UNESCO drew attention to the connection between the two parts of the component long ago, noting that "media diversity is [...] rooted in an institutional culture of self-regulation, peer scrutiny and responsiveness to the audience", which includes, in particular, measures to ensure editorial integrity. On the other hand, the structural plurality of the media market plays only a minor role in most countries, except in three, with Germany far ahead of the others. Higher market plurality scores usually do not correlate with higher freedom ratings, whereas higher scores for diversity and editorial integrity do so *consistently*. In most cases, market mechanisms have clearly failed to provide the necessary infrastructure for freedom of expression, perhaps due to insufficient regulation. However, it is alarming that the renowned *World Justice Project* rates freedom of expression highly in only 10 EU countries.[46]

FIGURE 2
MEDIA FREEDOM OF EXPRESSION

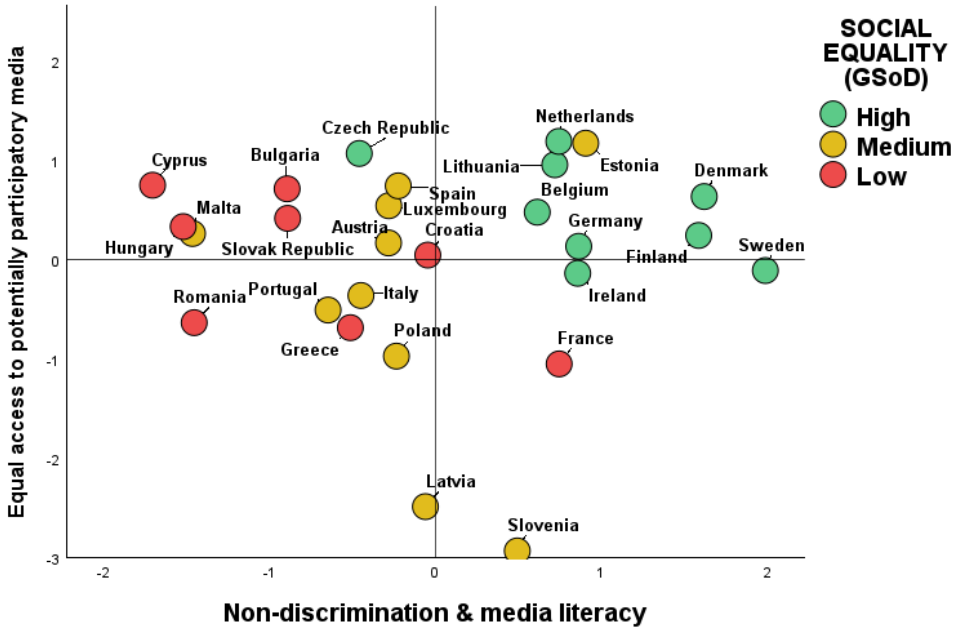


NOTE. PRINCIPAL COMPONENT ANALYSIS INCLUDING EIGHT VARIABLES; ROTATION METHOD: VARIMAX WITH KAISER NORMALISATION; COMPONENTS WITH EIGENVALUE > 1; LOADINGS > .400; TOTAL EXPLAINED VARIANCE: 72,8%

Finally, **non-discriminatory representation** of social groups, as exemplified by women and minorities, non-discriminatory allocation of state subsidies, and efficient **measures to strengthen media literacy skills** on the one hand, ***and*** (infrastructurally secured) **access to public service media, online media, and community media** serve the value of **social equality** (Figure 3). Contrary to media freedom and freedom of expression, each of which has a single dominant

component (shown on the x-axis), the two components differ less in their relationship to equality, underscoring their similarly high relevance.

FIGURE 3
SOCIAL EQUALITY



NOTE. PRINCIPAL COMPONENT ANALYSIS INCLUDING EIGHT VARIABLES; ROTATION METHOD: VARIMAX WITH KAISER NORMALISATION; COMPONENTS WITH EIGENVALUE > 1; LOADINGS > .400; TOTAL EXPLAINED VARIANCE: 66,0%

None of the components mentioned above can guarantee a democratic media system on their own—it is the interaction of all components that is important. This is also evident from the positioning of the 27 EU countries in the three charts.

The Role of Citizens

However, the people are rarely mentioned in media law and regulation, and when they are, it is usually only indirectly. Citizens are rarely involved in negotiations to establish conditions intended to safeguard democratic public discourse, whether at the political or organisational level.

There is only a single mention of *civic* participation in the *European Media Freedom Act* (recital 8): "Pluralistic media content produced in accordance with editorial freedom in the internal market [...] is key to fostering public discourse and civic participation. [...] It is also

essential for cultural and linguistic diversity in the Union, given the role of media services as carriers of cultural expression."

It is not only the subordinate importance assigned to civic participation in the context of media policy that becomes evident, the statement also clearly shows "the structure of vertical communication, where the flow runs from top to bottom, where the few talk to the many about the needs and problems of the many from the standpoint of the few."[47] As MeDeMAP surveys among journalists across 10 European countries[48] show, this structural bias remains prevalent in many newsrooms. Journalists seek to maintain control over the processes of representation and participation in the media, even in formats that involve the audience directly. With a few notable exceptions, particularly in the community media sector, this applies even more to the participation of the audience—or rather, the "people formerly known as the audience"[49]—in the production of media content or programme planning or management.

On the other hand, MeDeMAP qualitative audience research[50] reveals that, to put it bluntly, many people, while acknowledging the importance of independent professional journalism, agree that traditional media are distant from the people and do not promote participation, while social media platforms promote only superficial, easily manipulated participation. As a consequence, many feel disconnected and demotivated, which may undermine trust in the media and politics and fuel news avoidance and political apathy.

Connected with the "top-down-barrier" to the democratisation of public communication, McBride identified another barrier, "erected between those who send and those who receive the messages in the communication process when people lack the knowledge for decoding or understanding messages."[51] This barrier is arguably reinforced by a non-participatory-oriented journalism, as well as by a lack of opportunities for people to become familiar with media practices—and to get in touch with open spaces—to exercise their communication rights.

UNESCO documents allow for defining a three-stage model that is consistent with the recommendations of four citizens' parliaments (in Austria, the Czech Republic, Ireland and Slovenia) and can also serve as a three-stage plan for policy-making:

- widespread—and informed—access to the means of communication and a variety of media offerings, particularly to potentially (more) participatory media such as public service media, community media and "safe online spaces"[52];
- representation of the diversity of (even contradictory) positions reflecting a "conglomerate of all kinds of individuals [...], societal subgroups, small- and large-scale communities, criss-crossed by differences related to class, ethnicity and gender (among

other social categories) and structured through diverse societal fields", so that "the different positions are represented and can engage in a societal dialogue"[53]—a notion strongly supported by European citizens in accordance with the principle "Nothing about any social group without that group"[54];

- low-threshold opportunities for active participation of a socio-culturally broad spectrum of citizens in the production of media content, accompanied by capacity building measures to acquire "media agency" (as a next step to having the skills to critically engage with media, which is usually called "media literacy" or "media competence").[55]

To sum up by using a definition provided by UNESCO, in order to serve a democratic society's variety of civic visions and discourses, media and information literacy has to be implemented as "a set of competencies that empowers citizens to access, retrieve, understand, evaluate and use, create, as well as share information and media content in all formats, using various tools, in a critical, ethical and effective way, in order to participate and engage in personal, professional and societal activities."[56]

A "Right to Communicate"

UNESCO's media policy approach to put citizens at the centre is dedicated to the ultimate goal of empowering them to exercise their fundamental rights.[57] This leads to a more differentiated view on the nature of freedom of expression, which can be considered a double-sided right: according to Article 11 of the Charter of Fundamental Rights of the European Union, it "shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers". The right to receive information is a corollary of the right to speak; they cannot be treated separately. Only the interrelated exercise of both rights—to cite UNESCO's McBride report *Many Voices, One World*—serves the character and goal of democratic communication as an "open-ended process of response, reflection and debate". The "right to discuss" thus established "secures agreement to collective action and enables the individual to influence decisions made by those in authority".[58] Integrating these *three* rights, a "right to communicate" has been proclaimed. However, even at its scholarly and politically relevant peak with the McBride Report, it was not finally settled and soon faded into the background of the political and legal debate. Nevertheless, given its concern for a "democratisation of communication" through "increased participation in and access to societies' myriad communication activities",[59] the need for a precisely formulated "right to communicate" should be reconsidered amid radical changes in media supply and use.

UNESCO has the competence and expertise to be the voice of citizens in all their diversity. The credibility of this function could be strengthened by involving citizens more closely in its media policy initiatives.

Notes

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MEDEMAP

Policy Paper 2

Serving Democracy. Challenges to Journalism in the Age of Digital News

Josef Seethaler and Gabriele Melischek

DELIVERABLE 1.7, Part 2

MeDeMAP – Mapping Media for Future Democracies

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Executive Summary

Journalism remains a cornerstone of democratic societies, yet it operates under unprecedented pressure. Overlapping crises—geopolitical conflict, social polarisation, economic disruption, and growing disinformation—are undermining both public discourse and the sustainability of professional journalism. Evidence from the MeDeMAP project, based on research in ten European countries, shows that **citizens and journalists broadly agree on what democratically relevant journalism must deliver**: high professional standards, independence, inclusiveness, and meaningful participation—but they differ on some of the ways journalism should be practiced.

Evidence from the MeDeMAP Project: What Democratically Relevant Journalism Requires

Based on interviews and surveys among journalists, focus groups with citizens and citizen parliaments, the paper identifies five core principles for journalism that serve democracy:

1. High Journalistic Standards as Key Tools Against Disinformation

Both journalists and citizens see professional standards such as verification, fact-checking, transparency, accountability and fair representation as the most effective defense against disinformation, especially given limited trust in platforms, influencers, and AI-generated content. Trust remains highest in public service and local media.

2. Monitoring Power and Exposing Injustice

Citizens expect journalism to monitor political and economic power but also to expose social injustices, and to uphold this watchdog role, even though it is costly and increasingly difficult under current economic conditions. Media companies should urgently understand that this role contributes to the legitimacy and recognition of journalistic work—and thus also to the stabilisation of their market position.

3. Representation of Civil Society and Citizens

In media coverage, not only politicians and business people should be represented but also civil society actors and people directly affected by the issues being reported on. This applies particularly to marginalized groups. This would broaden perspectives, counter elite-dominated discourse, and strengthen democratic decision-making processes by reflecting social plurality.

4. Meaningful Participation

While most journalists strive to promote an informed citizenry prepared to make well-founded decisions, citizens favor broader participation, including community-level discussions and opportunities for direct interaction with political actors, up to autonomous participation in media production. Participatory formats, as popularized by the Internet but long practiced

primarily by community media, are highlighted as underused opportunities for mainstream journalism.

5. Empathy, Emotions, and Communication on Equal Footing

Growing news avoidance, especially among younger audiences, reflects fatigue, distrust, and disengagement. To counter this, journalism must adopt formats that acknowledge emotions, everyday concerns, and unequal power relations, and allow users to engage with media on an equal footing. This rebalancing of unequal power positions might be more promising if it is part of an organisational culture of peer-scrutiny, responsiveness to the audience, and social diversity in any aspect—also within the newsroom.

Democracy depends on independent, credible, inclusive, and socially responsive journalism. The findings of the MeDeMAP project demonstrate that citizens and journalists largely agree on this mission. What is missing are the policy frameworks, self-regulatory measures and resources needed to make it sustainable. Strengthening journalism is not a sectoral issue, but a strategic investment in democratic resilience.

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Journalism Amid Multiple Crises

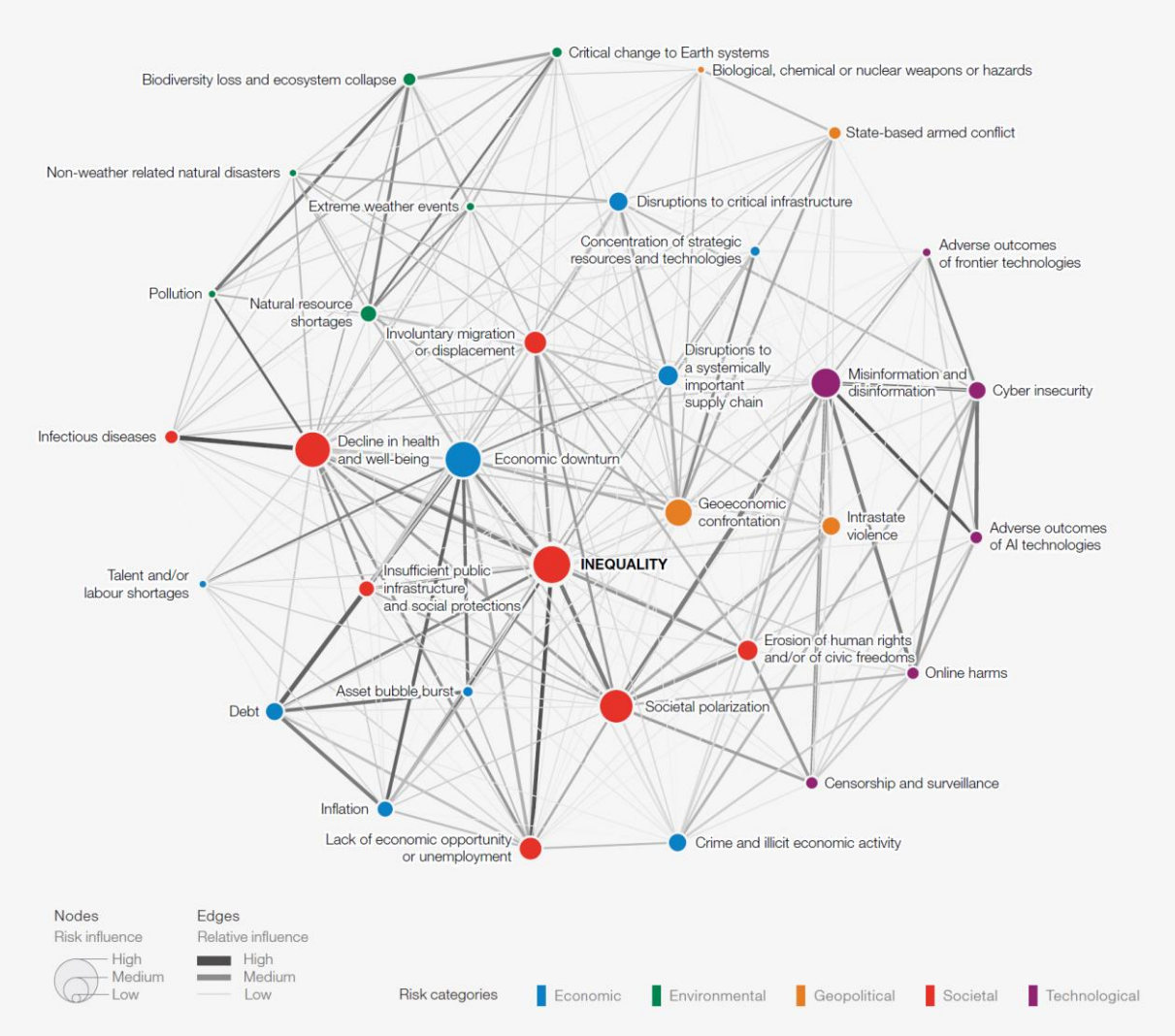
According to the World Economic Forum's *Global Risk Report 2026*, *geoeconomic confrontation*, *state-sponsored armed conflicts*, *extreme weather events*, *social polarisation*, and *misinformation and disinformation* can be classified as priority risks. Together, they account for more than 50% of the risk perception. With *geoeconomic confrontation* considered by far the greatest risk for 2026, followed by *state-sponsored armed conflicts*, two geopolitical risks now top the list, demonstrating that "The multilateral system is under pressure. Declining trust, diminishing transparency and respect for the rule of law, along with heightened protectionism, are threatening longstanding international relations, trade and investment, and increasing the propensity for conflict." (World Economic Forum 2026, p. 6)

Extreme weather events have been significantly downgraded compared to 2025, while *social polarisation* and *misinformation and disinformation* are classified as increasing risks—not only compared to the previous year but also over a 10-year period. Furthermore, assessments of this risk in 2026 are very similar among age groups, unlike in the past, when they varied greatly. This means that *misinformation and disinformation* have become a matter of general concern. Among younger age groups, it even ranks first.

It is not surprising that survey respondents associate *misinformation and disinformation* with *cyber insecurity*, *adverse outcomes of AI technologies*, and *online harms*, but also directly with *social polarisation*. However, there is also an indirect link via the *erosion of human rights and civil liberties*, as well as *censorship and surveillance* (that can also be fuelled by the online risks mentioned above), both of which can cause *social polarisation*, which in turn—just like the *erosion of human rights*—is particularly associated with *inequality*, which has emerged as the most interconnected global risk for the second year in a row.

In short, deepening divides along political, cultural, or identity lines within societies are being amplified by the negative side of technological advancements and disproportionate political and legal responses that may restrict fundamental rights such as freedom of expression and promote social inequality. All this corrodes public discourse.

FIGURE 1
GLOBAL RISKS LANDSCAPE: AN INTERCONNECTIONS MAP



SOURCE. WORLD ECONOMIC FORUM, *THE GLOBAL RISKS REPORT 2026*, P. 11.

Figure 1 shows that in times of complex economic and political interconnectedness at both national and international levels, crises rarely occur in isolation. They transcend sectoral, geographical, institutional, cultural, legal and public-private boundaries, which normally enable government administrations to classify, contain and manage crises. This means that traditional divisions of responsibility become blurred, and that political decisions and collective behaviour in one sector and country affect the situation and scope for action in other sectors and countries—triggering feedback effects on different time scales. Sociologists refer to this phenomenon as a "transboundary crisis" (Boin 2019). Russia's invasion of Ukraine is a striking example of a crisis whose consequences will have a long-term impact on many areas of life and change the political landscape.

It is not surprising that the disruption, uncertainty and destabilisation of individual and social life caused by such crises trigger fears in many people and lead to psychological as well as financial problems in coping with everyday life. The more confusing or threatening the situation becomes, the more likely it is to turn into a subject of political and public struggle, in which different actors with competing interests fight for the acceptance and dominance of their interpretations and solutions. The complex situation, however, may also invite "polarisation entrepreneurs" (Mau 2025) to capitalise on existing tensions and differences for their own particular interests that can only flourish in a society that no longer has a common basis for discourse—with all the (strategically evoked) negative consequences for a democratic society.

At this point, the importance of independent journalistic media as a forum for an informed democratic public debate, critical of political and economic power, ensuring pluralistic representation of social groups and allowing broad participation in the discourse, becomes apparent.

Journalism Under Difficult Conditions

At the same time, the very foundations of journalism are under threat. The media market's viability is at risk, as a significant share of national advertising revenue flows to global digital platforms, weakening the financial base of domestic media organisations and proving their long-term business models outdated. Existing state funding mechanisms are fragmented, outdated, and poorly aligned with goals such as quality, innovation, and long-term sustainability. Print continues to decline rapidly, television is barely defending its position, and local media outlets face existential threats. Major newsrooms have reduced staff and salaries. Particularly, freelancers face precarious social conditions. Journalists are increasingly confronted with physical and mental threats, including hateful speech, public discrediting of their work, and attacks on personal morality. Not all political and corporate actors recognize that independence—both political and economic—is essential for journalism to remain credible, courageous, and socially responsible.

What challenges does democratically relevant journalism face in these troubled times? How can it respond to them and be successful under difficult conditions?

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Reflections on Democratically Relevant Journalism

"The use of traditional information sources increases by age: TV (from 50% of respondents aged 15-24 to 82% of those aged 55 and over); radio (from 22% to 50%) and printed newspapers and magazines or their online versions (from 24% to 49%). Conversely, the use of other digital sources decreases with age: search engines (from 47% of those aged 15-24 to 36% of those aged 55 and over), social media platforms (65% vs 27%), video platforms (39% vs 17%) and AI chatbots (18% vs 4%)."
(European Parliament, Social Media Survey 2025)

These are dramatic changes in media use, which definitely have wide-reaching consequences for professional journalism. There is a great deal of research worldwide on the status quo (e.g., Hanitzsch et al. 2025). In the context of the Horizon Europe project 'Mapping Media for Future Democracies (MeDeMAP)', we tried to open up perspectives of how journalism could deal with the challenges while serving democracy. Extensive qualitative and quantitative research was conducted among journalists and citizens in 10 European countries (Austria, Czech Republic, Estonia, France, Germany, Ireland, Italy, Poland, Portugal and Slovenia), including interviews and surveys with journalists, focus groups with citizens and citizen parliaments, to capture both perspectives. From the results of both research strands (Klimkiewicz et al., 2026; Miconi et al., 2026; Sedlacek and Peissl, 2026), the following—partly surprising traditional, partly almost revolutionary—reflections on democratically relevant journalism can be derived.

1. Journalistic Standards as a Bulwark against Disinformation

Trust in the news varies considerably across the examined countries. According to the 2025 *Digital News Report* (Newman et al. 2025), it is highest in Portugal (54%) and Ireland (51%), and lowest in France (29%) and the Czech Republic (33%).[1] In most countries, public service media and local newspapers are among the most trusted media brands; in Italy, outlets

[1] No data is available for Estonia and Slovenia.

perceived as politically neutral tend to be more trusted than others. In contrast, trust ratings for social video platforms are at best 15% (except in Poland, with 24%), and those for influencers are in the single-digit range (except in the Czech Republic, with 11%, and Poland, with 10%); this data is, however, from 2023. (European Parliament 2023). On average, only 12% feel confident in recognising disinformation when they encounter it, with Ireland (20%) and the Czech Republic (17%) somewhat deviating from this trend (European Parliament 2025). In addition, there are "concerns among the general public that AI will make the news less transparent, less accurate and significantly less trustworthy." (Newman et al. 2025, p.36)

These numbers illustrate one of the main results of MeDeMAP research: Journalists and citizen agree that in view of the EU's not-so-effective attempts to regulate large global online platforms, this situation hast to be understood as a mandate for independent and transparent reporting committed to **high journalistic standards and fair representation of people**, which the participants in our studies consider **as the most important protection against disinformation**. Verifying stories before publishing and fact-checking questionable reports from others are top of mind for media professionals and audiences alike.

2. Involvement of Civil Society Actors and Citizens Affected by the Issues Addressed in Media Production

Trust in democratic institutions is equally important. In a democracy, the formation of opinion and will that precedes any political decision is a process of negotiation and struggle, a dynamic, often contested, and non-linear interaction between different groups striving to establish, defend, or change rules, power dynamics, or outcomes, which are thus always susceptible to change. When these—often lengthy and tense—processes, albeit carried out by democratic means, are prematurely disparaged in media coverage as "horse trading" or "squabbling", this would weaken trust in democracy. Rather, the media's task should be to provide a forum for public debate that represents **the plurality of the social and the political**.

In MeDeMAP research, both journalists and—to a greater extent—citizens emphasized the **involvement of civil society actors and citizens affected by the issues addressed** in media productions to broaden the spectrum of concerns, interests, and possible solutions to be discussed and linked back to politics. This includes, in particular, socially marginalised groups, who all too often have no voice in public. Implementing this approach would highlight the

diversity of opinions and perspectives, thereby enabling people to form their own opinions and promoting mutual understanding.

3. Monitoring those in Power and Exposing Social Injustices

Supporting trust in democratic institutions does not mean uncritically accepting the actions of those involved. On the contrary, trust is strengthened when institutions work transparently and the media have the widest possible access to information, an objective the European Media Freedom Act represents an important first step toward. For journalism, this means **monitoring those in political and economic power** and **exposing social injustices and abuse of power**. This underscores the necessity of legal provisions that guarantee media independence from the state and of strong self-regulatory measures to prevent interference by political and economic interests with editorial autonomy. The exercise of this monitoring function will repeatedly require the use of investigative methods—which need money and time. Journalists perceive this as one of the most fundamental conflicts in their everyday practice. For many citizens, however, the watchdog role is a necessary component of democratic journalism. Not exercising this role for financial reasons would call the legitimacy of journalism into question.

4. Accessibility, Inclusiveness, and Facilitating of Meaningful Participation

The opportunity to participate *in* the media represents a step beyond participation *through* the media. In the latter sense, media encourage political participation in various ways, from providing information relevant to (groups of) citizens to representing a variety of viewpoints and voices. The main aim is to enable citizens to make informed choices in the voting booth. Participation *in* the media involves both the production of media content and media management, thereby allowing the participatory process to transgress the boundaries of the media sphere and extend into the political sphere (Carpentier 2011; Carpentier and Doudaki 2026). Here, the aim is to participate in political life in general. Creating motivating incentives requires formats that enable the "people formerly known as the audience" (Rosen 2012) to be actively involved in media production at various levels.

Regarding these two forms of participation, the views of journalists and citizens who took part in the MeDeMAP research differ widely. While most journalists strive to promote an informed citizenry prepared to make well-founded decisions at the ballot box—an essential function of the media in representative democracy—and give less emphasis to participatory processes beyond voting (such as civil society initiatives) and/or in the newsroom, citizens, in general, view participation more broadly, encompassing not only voting but also community involvement, civic engagement, and volunteer work. Accordingly, they want the media to focus more on **accessibility, inclusiveness, and facilitating meaningful participation**, thus calling, for example, for more community-level discussions and opportunities for direct interaction with political actors, up to autonomous participation in media production. These formats, popularized by the Internet but long practiced primarily by community media, pose new opportunities for journalism.

5. Empathy, Emotions and Communication on an Equal Footing

People who are disappointed with democracy and the problem-solving abilities of political institutions either turn to media outlets that reinforce and radicalise their fundamental rejection of the 'system,' or they disengage from public discourse and avoid news in general. The same applies to those who are exhausted by the sheer volume of news. On average, about 37% of the population in our sample of countries avoid the news often or sometimes (Newman et al. 2025).[2] Previous research shows that this particularly tends to affect younger people with a limited media repertoire, who primarily obtain information online. To a great extent, they expect the media to help them understand the news of the day and integrate it into their everyday lives (Beaufort 2020). Even if it seems to be almost impossible to bring the 'hard core' of this group back into the general public, the only way to do so is to take their fears and concerns seriously. Perhaps more than in any other context, this may require **formats that give room for empathy and emotions, and allow users to engage with media on an equal footing**. This rebalancing of unequal power positions might be more promising if it is part of an organisational culture of peer-scrutiny, responsiveness to the audience, and social diversity in any aspect—also within the newsroom.

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MEDEMAP

Policy Paper 3

The Audience Matters. Some (Radical?) Thoughts on Future Perspectives for Public Service Media

Maren Beaufort

DELIVERABLE 1.7, Part 3

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Executive Summary

This policy paper argues that public service media can remain strong and democratically relevant only if they systematically integrate the audience perspective, understood not merely as reach or consumption but as citizens' diverse democratic expectations.

Core Argument

Democratic communication requires two pillars:

1. Normative soundness of information, and
2. Communicative resonance with citizens' democratic orientations.

Only when both converge can trust, public connection, and democratic agency be sustained.

Democratic Diversity and Audience Expectations

Citizens hold different but overlapping understandings of democracy, mainly:

- **Representative democracy**, emphasizing informed voting, institutions, and watchdog journalism.
- **Participatory democracy**, emphasizing direct involvement in democratic processes, networking, and connective action.

Research across EU countries shows that these orientations systematically shape how people use, evaluate, and trust news. When media content aligns with these expectations, trust and engagement rise; when it does not, news avoidance and distrust increase.

Strategic Recommendations

Based on MeDeMAP findings, the paper proposes three strategic directions:

1. **Rethink representation**
    - Link representation with forum and functions through citizen formats, neighborhood reporting, and stronger self-representation—and move beyond traditional social categories toward intersectional, real-life social groups.
2. **Increase social diversity within PSM staff**
    - Strengthen accountability to citizens by reflecting diverse lived experiences in newsrooms.
      The success of ORF's *ZiB Instagram* and *ZiB TikTok* illustrates how staff diversity enhances resonance with participatory-oriented audiences.

3. **Integrate citizen expertise into governance and production**
    - Involve citizens informally in reviewing routines, formally in co-creation, and institutionally in decision-making structures to rebuild trust and relevance.

Conclusion

Journalism that is normatively excellent but democratically unconnectable risks irrelevance. Making **democratic diversity a guiding principle** for programming, governance, and identity is presented as a key condition for **democratic resilience and the long-term sustainability of public service media**.

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1. Why is it crucial today for public service media to systematically consider the expectations and perceptions of people?

It is a simple but uncomfortable thought: Even the best journalism in the world is democratically irrelevant if it does not reach, resonate with, or increase citizens' agency.

For decades, research and media practice have focused primarily on the supply side of information — content quality, professional standards, normative criteria. All of this is indispensable. But it is not sufficient. As Jesper Strömbäck and colleagues observed (2020, p. 1): "Even a perfectly informative news media environment is of little democratic use if citizens by and large do not consume the news or if they do not trust the news." And yet, despite how obvious this sounds, the audience perspective is still not systematically embedded as a guiding principle—beyond reach metrics.

However, the crisis of public communication (Davis, 2023) is not only a crisis of quality, it is also a crisis of misalignment: Only when

- normative soundness of information content *and*
- democratic connectability converge,

public service media (PSM) can sustain trust, public connection, and democratic relevance. Public connection depends on communicative resonance with citizens' democratic orientations: today, this resonance must account for another factor long underestimated: democratic diversity. Evidently, citizens have different but overlapping understandings of democracy, which in principle, correspond to two fundamental orientations (Held 2006): representative democracy, which is based on the principles of elected bodies and institutions representing the interests of the citizenry and protecting their rights, and participatory democracy, which aims at the direct inclusion of citizens in the processes of will-formation and decision-making by taking part in the "common work" of keeping an eye on issues affecting themselves, their communities and society as a whole.

Across the European Union, a participatory understanding of democracy is gaining ground. There are some indications of this in the most recent *European Value Survey* (EVS/WVS 2024) based on forms of "non-institutionalized participation", a concept famously developed by Max Kaase and Samuel H. Barnes in their seminal 1979 work on *Political Action: Mass Participation in Five Western Democracies*. It refers to forms of political action that occur outside the established, conventional channels of a representative democracy and can be considered one of the components of participatory democracy (Bengtsson and Christensen, 2016). On average, around 21% of respondents in 20 EU member states have participated in actions such as petitions, demonstrations, and boycotts, and a further 34% are willing to do so; combined, the potential for active citizen participation is therefore quite high: this is not a fringe phenomenon—it is diversity at the centre of society.

Each understanding of democracy is associated with different expectations regarding the information media: "baseline norms for assessing media and communication vary considerably" across the various notions of democracy (Davis, 2019, p. 19). Qualitative research in the Horizon Europe project *Mapping Media for Future Democracies* confirms quantitative analysis for all and individual EU Member States (Beaufort 2020a, b; 2025; 2026; Beaufort and Seethaler 2021; Seethaler et al. 2026; Beaufort et al. 2025): these expectations systematically shape how people use, evaluate and trust the news. People expect an information environment that matches their individual democratic orientation—consciously or unconsciously—and adjust their information use accordingly. With this, democratic diversity is among the most crucial factors determining whether public communication becomes connectable, alongside platform logics and attention dynamics.

In turn: unmet expectations translate into news avoidance and declining trust. Global news avoidance stands at around 40 percent and is recognized as serious threat to epistemic integrity, communicative equality, and democratic agency. The *Digital News Report* (2025) identifies key reasons, which are: negative emotional impact (approx. 40%), overload (approx. 30%), excessive focus on institutional politics (approx. 30%), lack of connectability (approx. 20%), irrelevance (approx. 20%), and difficulty (approx. 10%). Most of these reasons relate to underlying democratic expectations.

For example, for Austria, it has been shown that only representative-oriented users find sufficient information to meet their needs. On the other hand, the news avoiders group includes a large share of participatory-oriented users whose expectations are insufficiently addressed in the actual information supply. This suggests that news avoiders are not necessarily disengaged from societal affairs—at least not initially. Rather, they encounter an information supply that

does not correspond to their specific needs as democratic citizens. In other words, news avoidance may reflect democratic diversity itself rather than societal apathy.

Democratic functionality of information rests on two pillars: normative soundness and communicative resonance with individual democratic orientation. It is not either-or—it is both: When both come together—when journalism meets democratic diversity in a connectable way—then public connection, trust, and democratic agency become possible. The audience perspective matters.

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2. What expectations do people actually have towards the media?

This is the key question. Because it indicates a potential avenue for targeted intervention. The short answer is: It depends. On what?

On the democratic cultures prevailing in a country, and on the democratic orientations of the people.

Different concepts of democracy shape the roles attributed to news media and democratic practices. They shape what citizens expect information to do. And they shape how they use it.

In liberal-representative dynamics, media are expected to support collective action by enabling the "informed citizen." The central idea here is that citizens make rational choices in the voting booth. They must be informed about relevant societal issues debated in the marketplace of ideas. In this model, citizens primarily assume a more passive role, while the media acts as monitor, disseminator, watchdog, and forum—ideally, presenting plural perspectives, ensuring transparency, scrutinizing power, and delivering fact-based, impartial information of general relevance.

Participatory dynamics are different. Political participation is understood as voluntary work on problem-solving. The focus shifts from supporting the performance of democratic institutions to fostering democracy itself. This is also referred to as "logic of connective action" (Bennett & Segerberg, 2013). Citizens connect their concerns through issue-specific, loosely organized networks. The aim is the "empowered" citizen, and the inclusion (especially) of the so-called silent majority in public debate. In this framework, the media is access provider, connector, and mobilizer. Through exercising representational and participatory functions, media integrate diverse voices, enable bottom-up cooperation, and create spaces where citizens can articulate and contextualize their concerns. Content must be connectable, inclusive, and responsive to diversity.

As mentioned above, research shows that citizens' expectations regarding the democratic function and the quality of information supply closely align with the different democratic roles of the media. For example,

- liberal-representative-oriented users expect macro-level relevance, professional style, and strong monitoring functions;
- participatory-minded users expect content that enables autonomous orientation, inclusion, networking, and meaningful resonance with personal concerns on the micro-level.

To both groups apply that,

- when expectations are met, trust in the media and democratic agency increases;
- otherwise, trust in the media and democratic agency declines.

If people do not find sufficient information offers aligned with their needs, they are likely to lose interest, which can foster news avoidance, declining trust, and, ultimately, structural inequalities.

3. Against this background, how can a resilient democratic citizenry be fostered via information supply?

Scholarly literature that addresses the repositioning of PSM in light of radical changes in media offerings and use and increased competition with global platforms, usually builds on its strengths of high-quality information and independent control, which were developed to support representative democracy. The threat posed by misinformation and disinformation thus often serves as the starting point for reform recommendations. Three approaches therefore dominate the discussion: dedicated fact-checking, enhancing media literacy, and developing genuine PSM online platforms (Sehl 2024). Media literacy initiatives are widely supported and implemented among EBU members, and there are also some fact-checking initiatives, while the implementation of genuine PSM platforms is contested and rather uncertain. However, the first two approaches in particular, as important as they are, arose from a purely defensive position: protecting democratic society against fake news and disinformation. We propose changing perspective and taking *democracy as it is lived in all its diversity* as a starting point for strengthening the legitimacy and relevance of public service media.

Diversity is the key.

"Diversity has become part of the PSM DNA." One can only emphasise this statement on the EBU website.[1] So far, public service mandates have usually focused on regional diversity and/or the appropriate representation of social groups, reflecting PSM's commitment to universality. In more recent times, for example, gender mainstreaming plans and step-by-step plans to improve access to PSM programmes for people with disabilities have become widespread instruments. These are important steps of inclusion (which, in times of increasing social diversification, is perhaps a better term than 'universality'). However, as a recent study by Marta Rodríguez-Castro and Azahara Caedo, published by the Austrian public service broadcaster ORF, summarizes, "diversity and inclusion, socio-economic diversity remains an

[1] https://www.ebu.ch/research/membersonly/report/public-service-media-diversity-strategies (retrieved on February 19, 2026).

underexplored (although emerging) dimension within the strategic frameworks of most European PSM." Referring to best-practice examples from the BBC and ARD, the authors advocate "strengthening the connection with citizens and adopting a pluralistic vision of society" (Rodríguez-Castro and Caedo 2025, p. 32). To bring this vision to life, it is not enough to simply produce content targeted at various segments of the population; it requires incorporating the needs of underserved audiences into programme planning and internal governance. Particularly in the information sector, at the very top of people's needs are the specific needs as democratic citizens. It's about the question: what are the implications of democratic diversity in society itself for programming mandate, corporate identity, and management structures of public service media.

What is needed going forward?

Based on the results of Horizon Europe project *Mapping Media for Future Democracies*, we recommend considering the following proposals.

(1) Rethinking the PSM's representational role in light of two kinds of intersection

- first, beyond representations of more traditional societal groups like minorities and women towards representing real-life social groups that result from different combinations of social categories such as class, ethnicity, gender, age, educational level, and many more: addressing and incorporating their notions of democracy could support public connection across diverse groups and promote social cohesion, also and especially by revealing differences and enabling democratic struggle (Carpentier and Wimmer 2025).
- second, through relating the representational role to the forum and participatory role: the former combination would allow for more open arenas that enable networking and interaction such as 'citizen formats' and 'neighbourhood reporting', the latter for strengthening the importance of self-representation: even in programmes generally conveyed by media professionals, equal power balance between lay participants and professionals can be achieved, promoting mutual understanding and trust (Seethaler et al. 2025; 2026).

(2) Establishing social diversity within PSM staff

Freedom of expression is closely linked to the diversity of viewpoints and voices in the media and the integrity of newsrooms, i.e., the autonomy and accountability of editorial offices (Seethaler et al. 2026). Contrary to the traditional form of accountability as institutionalised democratic control, this is about accountability to citizens and civil society, which has been pursued in EU governance since the 1990s and in EU media policy since the 2010s (Seethaler and Beaufort 2024). The establishment of broader accountability frameworks also includes, as Rodríguez-Castro and Caedo (2025) have pointed out, social diversity *within* PSM staff, thus connecting media professionals and the lived experiences of various communities.

This can be illustrated by a best-practice example from Austria: With *ZiB Instagram* and *ZiB TikTok*, ORF has achieved remarkable reach and resonance among younger and more diverse audiences. The success of both social media formats of ORF's main news brand (which are not shortened versions of the television broadcasts!) cannot be explained simply by platform or by pure attention-span logic. In contrast, they are editorially designed to resonate particularly well with participatory-oriented younger publics, *whose daily lived realities are even reflected in the diversity of the presenters*.

(3) Integrating citizen expertise in programme planning and management

Audience research across Europe and following various methods has shown that supporting and ensuring transparency and accountability as well as inclusive participation in the media are crucial to rebuilding trust (Miconi et al. 2025; Sedlacek and Peissl 2026). The establishment of broader accountability frameworks not only includes social diversity within PSM staff but also participation of citizens in production and management: this can be achieved in several ways:

- In a more informal approach, citizens should be actively involved in rethinking routine practices to detect potential unconscious biases in journalists' perceptions of the democratic needs of audiences and in developing new strategies.
- The next step could be the establishment of working groups of journalists and citizens to develop media products that reflect those needs.
- The most formal approach requires broader involvement of civil society representatives in internal bodies and decision-making processes.

No strategy can be considered a universal remedy, and PSM organisations differ across the European Union—including in terms of attempts by political actors to influence management and reporting (Klimkiewicz et al. 2026): Journalism that is normatively excellent but democratically unconnectable to growing parts of the population risks irrelevance. However, once democratic diversity works as an overarching programmatic PSM orientation, democratic resilience can be sustainable—and thus foster the future sustainability of public service media.

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MEDEMAP

Policy Paper 4

Sovereign Media Infrastructure, AI and the Future of Pan-European News Platforms

Building an Ecosystem for Data Readiness, Scale and Democratic Legitimacy

Alexander Baratsits and Josef Seethaler

DELIVERABLE 1.7, Part 4

MeDeMAP – Mapping Media for Future Democracies

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Executive Summary

The digital transformation has expanded access to information and reshaped democratic life, but it has also exposed a deep structural weakness: Europe relies on non-European platforms for distributing, discovering, and monetising its media. However, it is not enough to build new European platforms. It is about building an ecosystem for data readiness, scale and democratic legitimacy.

How Europe's digital dependency became a structural risk

The shift to digital platforms has changed how citizens encounter news, how public debate unfolds and how cultural and linguistic diversity is represented. However, Europe's public sphere increasingly runs on infrastructures it does not control. This creates several vulnerabilities:

- **Loss of sovereignty** because Europe does not control the infrastructures that mediate public communication.
- **Democratic fragility** because platform logics shape visibility, virality and public discourse.
- **Security concerns** because information flows depend on external infrastructures.
- **Competitive disadvantages** for European media, which must operate within systems they do not govern.

The EU's vision: multilingual, AI-enabled, cross-border platforms

The *Apply AI Strategy* proposes multilingual, AI-driven platforms that provide real-time, cross-border news. Such platforms could:

- strengthen Europe's media sovereignty,
- support linguistic and cultural diversity,
- enable cross-border collaboration,
- and reduce reliance on global platforms.

However, the main risk is that political and financial attention focuses on **interfaces and AI models**, while the decisive factor for success lies elsewhere:

Building the Foundations

Large-scale digital projects consistently show that the hardest part is not building the platform itself but ensuring that the ecosystem feeding it is ready. This includes:

- **Harmonised metadata** so content can be discovered and reused across borders.
- **Interoperable technical standards** that allow different actors to connect seamlessly.
- **Trusted governance frameworks** that ensure fairness, transparency and accountability.

- **Scalable integration** so organisations of all sizes can participate.

Without these data readiness foundations, even the most advanced platform architecture will fail to reach scale, diversity or legitimacy.

Ecosystem integration as a precondition for success and a policy priority

For multilingual, AI-enabled platforms to succeed, media actors across Europe—public service, commercial and civil society—must be able to operate within a **shared, federated and interoperable infrastructure**. This requires:

- technical capacity (metadata, APIs, content formats),
- organisational capacity (workflows, governance participation),
- and cross-sector coordination.

Policy must therefore support not only technological development but also the **institutional and operational integration** of the ecosystem: actors must be able to collaborate without losing autonomy.

Why a single platform cannot represent Europe

The Commission speaks of supporting "pan-European news platforms"—and **the plural form is crucial**. Europe's cultural, linguistic and media diversity cannot be represented by a single, centralised platform. Experience with global platforms shows that:

- one-size-fits-all architectures flatten diversity,
- centralisation concentrates power,
- and no single platform can reflect Europe's structural plurality.

A European Digital Public Space must therefore be **federated, plural and distributed**, allowing multiple platforms to interoperate rather than forcing all actors into one system.

What a European Digital Public Space should look like

To ensure democratic legitimacy and full diversity, such an infrastructure must be:

- **Cross-sectoral**, integrating public service media, commercial publishers and civil society media.
- **Format-agnostic**, supporting text, audio, video and emerging formats from the start.
- **Built on existing European initiatives**, which should serve as building blocks rather than be replaced.
- **Governed democratically**, ensuring transparency, accountability and participation.

The proposed vision is a **sovereign, federated and democratically governed European Digital Public Space** capable of supporting media distribution, AI-enabled discoverability and cross-border cooperation.

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1. Structural Dependency and Democratic Vulnerability

European media increasingly depend on a small number of dominant global platforms for distribution and visibility.

This structural dependency produces:

- Algorithmically shaped public discourse without democratic accountability
- Economic value extraction outside Europe
- Reduced visibility of public-interest journalism
- Weak innovation capacity among media SMEs
- Exposure to geopolitical interference and disinformation campaigns

Hybrid warfare strategies—intensified since Russia's invasion of Ukraine in 2022—exploit fragmentation and platform dependency within Europe's information ecosystem.

Regulatory instruments such as the Digital Services Act and the European Media Freedom Act are essential. However, regulation alone cannot substitute operational infrastructure capacity. Digital sovereignty requires not only rules—but systems.

2. AI as Strategic Inflection Point

The emergence of generative AI has amplified both risks and opportunities.

On the one hand (among other aspects):

- European journalistic content is increasingly used to train AI systems.
- AI interfaces further disintermediate publishers by capturing traffic and attention.

On the other hand, AI technologies offer transformative potential:

- Multilingual translation

- Semantic search in audiovisual archives
- Cross-border discoverability
- Deepfake and disinformation detection
- Transparent recommendation systems

The Apply AI Strategy explicitly supports pan-European platforms built on multilingual AI technologies .

Effective AI systems require:

- Structured and harmonised metadata
- Rights-cleared and ethically sourced content
- Linguistic diversity
- Representative societal voices
- Scalable ingestion mechanisms

Without coordinated efforts to enable European media actors to participate technically and organisationally, even advanced platform architectures will remain underutilised.

Media data spaces and interoperable language infrastructures can support this objective.

3. From Platform Concept to European Digital Public Space

A Federated, Multi-Layer Approach

Rather than a single centralised mega-platform, Europe should pursue a federated architecture composed of complementary layers:

Layer 1 – National Sovereign Distribution Infrastructures

Member States strengthen or develop sovereign digital distribution infrastructures across public service, commercial and independent/civil society media sectors, in a format-agnostic manner.

Layer 2 – European Cooperative Distribution Layer

Interoperable aggregation mechanisms connect national infrastructures and ensure traffic redirection to original sources. On this basis, a federation of European distribution platforms can form a Cooperative Distribution Layer.

This layer should build upon already established platforms that have developed technological infrastructure, data readiness and sector-specific media ecosystems—such as YEPnews (for public service media), Display Europe (for independent/civil society media) or the European Newsroom (ENR, for news agencies)—while also allowing for the development of new platforms that fit into the overall federated architecture.

It is essential that cross-referral mechanisms are enabled: content sources should be able not only to provide material to aggregators, but also to refer audiences back to their own platforms, and vice versa. Such reciprocal traffic flows strengthen network effects and preserve publisher autonomy.

In addition, common principles for transparency, ranking logic and fair discoverability should be defined at the level of the Cooperative Distribution Layer. Shared standards can ensure that algorithmic recommendation systems remain accountable, non-discriminatory and aligned with democratic values, while avoiding the concentration of gatekeeping power in a single platform.

If the ecosystem collaborates effectively, existing traffic generated by individual platforms can accumulate, amplify one another and generate additional reach beyond what each platform could achieve independently.

Layer 3 – European Media Data Space Backbone

Experience from both industry and public-sector AI initiatives consistently shows that the primary bottleneck in deploying AI systems at scale is not model development itself, but the availability of high-quality, interoperable and well-governed data. The European Data Strategy likewise emphasises that unlocking trustworthy data sharing through common standards, governance frameworks and sectoral data spaces is essential for Europe's digital competitiveness. In the context of pan-European news platforms, this means that sustainable impact will depend less on interface design or algorithmic sophistication, and more on the systematic preparation, harmonisation and governance of media data across sectors and Member States.

So data readiness is a key precondition for pan-European news platforms. Achieving such readiness requires alignment at multiple levels: common metadata models, interoperable protocols, harmonised ingestion processes, as well as clearly defined access and usage policies.

For media actors to contribute data at scale, trust is essential. Trust can be strengthened through transparency, democratic governance structures, open-source components, and clearly defined standards and protocols. At the same time, the infrastructure must be capable of scaling: operations need to function at multi-transaction level, and data space components must enable broad participation, including simplified plug-and-play solutions (such as multi-tenant connectors) and appropriate implementation and maintenance support for SMEs.

The **Trusted European Media Data Space (TEMS)** was established with the objective of building such a data space and could serve as a foundational building block for a federated European Digital Public Space.

TEMS is one of the first European-level initiatives in which public service broadcasters, publishers, news agencies and independent/civil society media have aligned around a shared infrastructure concept. The project has achieved substantial results, including:

- A common data model
- An interoperability architecture
- A governance framework
- A trial technical infrastructure

These achievements represent not only technical progress but also the establishment of shared governance principles across a historically fragmented media sector.

From a strategic perspective, TEMS addresses two central structural challenges:

1. **Data readiness for AI and large-scale distribution.**
   AI-enabled platforms depend on structured, harmonised and reusable data. TEMS provides a framework for preparing media data to enable cross-border use cases and scalable integration.

2. **Value creation and intellectual property positioning.**
   As AI systems and distribution platforms increasingly rely on journalistic content, the media sector must develop collective mechanisms to safeguard intellectual property rights and ensure fair participation in value creation. The TEMS governance framework provides a transparent forum to align such strategies at the European level.

At the same time, lessons learned from the project underline the complexity of building operational data spaces. Enabling technologies are still maturing, and onboarding SMEs—which represent a substantial share of the European media landscape—requires simplified, scalable solutions that will need further development and transitional implementation models. This highlights that data space development is an iterative process requiring continuity and proportionate structuring.

Within a European Digital Public Space architecture, TEMS can function as the backbone that:

- Collects and harmonises media data across sectors
- Enables seamless operationalisation for AI-enabled platforms
- Provides governance mechanisms for value distribution and IPR protection
- Bridges national infrastructures and European-level services

In this sense, TEMS is not merely a technical layer, but a structural coordination mechanism for the European media ecosystem.

Significant further work will be required to reach full operational maturity. The technical stack of TEMS has experienced delays, partly due to the complexity of developing interoperable data space infrastructures and partly because enabling components—such as the open-source middleware framework SIMPL—are still evolving. This has affected the timeline for full operational deployment.

At the same time, it is important to distinguish between the maturity of individual components. Several foundational elements for data readiness are already well prepared. Governance structures, interoperability concepts and the common data model are in place. Moreover, practical components such as the Search Explorer—which already integrates and operationalises data from initiatives like YEPnews and Display Europe—demonstrate that cross-platform data merging and discoverability can function in practice.

In other words, while the full data space architecture is not yet fully operational at scale, key building blocks for a pan-European use case are already available and functioning.

For TEMS to evolve from this preparatory stage into a stable and scalable operational backbone over the coming years, continued and proportionate investment will be required. Such investment would not merely support a single project, but consolidate the data readiness infrastructure necessary for any pan-European news platform initiative to succeed.

Layer 4 – AI Integration Layer

The focus of this paper lies on the infrastructural and governance foundations of a European Digital Public Space; the AI layer is therefore outlined here only in terms of guiding principles rather than detailed technical specifications.

Multilingual AI tools support:

- Translation
- Semantic search
- Cross-border recommendation
- Detection of coordinated disinformation

This AI layer can build upon existing European language and data space initiatives. This layered approach reduces structural platform dependency while safeguarding pluralism and distributed ownership.

4. Political and Institutional Design Principles

The STOA studies[1][2] have provided valuable analysis regarding feasibility and European added value. However, core design choices merit further structured stakeholder dialogue.

4.1 Cross-Sectoral and Format-Agnostic from the Outset

While public service media can play an important role, a pan-European infrastructure should be cross-sectoral and format-agnostic from its inception.

[1] STOA study 2023: European Parliament: Directorate-General for Parliamentary Research Services, *European streaming platform for national news accessible in all EU languages*, European Parliament, 2023, https://data.europa.eu/doi/10.2861/01878

[2] STOA study 2025: European Parliament: Directorate-General for Parliamentary Research Services, *A European news streaming platform. Study on European added value and governance*, European Parliament, 2025, https://data.europa.eu/doi/10.2861/5387165

Limiting initial participation to a single sector or to predominantly audio-visual formats risks:

- Excluding independent/civil society media/Publishers
- Reducing diversity of perspectives. There are some Member States mentioned in the 2nd STOA study, that clearly state a lack of pluralism and the problematic role of PSM due to government intervention
- Neglecting text-based journalism and emerging digital-native formats – this is also a cost factor, SMEs cannot afford expensive audio-visual production
- Reinforcing structural imbalances in Member States where pluralism remains contested

Pluralism must be embedded structurally across:

- Public service media, commercial publishers, independent/civil society media
- Text, audio, video and hybrid formats

4.2 Governance and Legal Structure

The appropriate governance model requires careful consideration.

A purely consortium-based arrangement without clear legal personality may raise questions regarding:

- Liability and accountability
- Democratic oversight
- Financial sustainability
- Long-term institutional stability

Possible governance options could include:

- Cooperative models
- Federated associations
- Dedicated European legal entities
- Hybrid public-interest structures

Whatever form is chosen, it must guarantee: Cross-sector representation, transparency and democratic principles, protection from political capture and sustainable funding mechanisms.

In addition, intellectual property rights (IPR) questions must be carefully addressed, including licensing frameworks, value distribution mechanisms and safeguards against unremunerated downstream exploitation.

Governance design should involve broad stakeholder participation before final institutional commitments are made.

5. Operationalisation and Investment Principles

The development of a pan-European news infrastructure should be understood as a strategic infrastructure project that strengthens Europe's media ecosystem and AI competitiveness.

5.1 Ecosystem Readiness

While public service media can play an important role, a pan-European infrastructure should be cross-sectoral and format-agnostic from its inception.

Key enabling components include:

- Metadata harmonisation and interoperability standards
- API development and secure data-sharing environments
- Multilingual processing pipelines
- Rights management integration
- Technical onboarding and organisational adaptation support

Balanced investment across technological and ecosystem components strengthens:

- European AI competitiveness
- SME participation
- Cross-border integration
- Democratic pluralism

5.2 Intellectual Property and Value Participation

Intellectual property rights (IPR) questions must be carefully addressed, including licensing frameworks, value distribution mechanisms and safeguards against unremunerated downstream exploitation.

As AI systems and distribution platforms increasingly rely on journalistic content, the media sector must ensure fair participation in value creation. Operationalising data spaces and federated distribution infrastructures creates the structural conditions for more balanced value participation across the ecosystem.

Long-term sustainability will depend on embedding operational data readiness within broader European initiatives. Investment in data space maturity is therefore not project-specific support, but a structural prerequisite for any pan-European platform initiative to succeed.

6. National Initiatives as Building Blocks

Several national and cross-border initiatives demonstrate the feasibility of sovereign, open and interoperable distribution infrastructures .

Such initiatives illustrate that:

- Open-source infrastructures can operate independently of dominant global platforms
- Semantic enrichment increases discoverability
- Multilingual processing expands accessibility
- API-based architectures enable federated interoperability

These experiences should be considered as building blocks within a broader European architecture.

7. European Added Value

A European Digital Public Space would generate multiple layers of added value:

Democratic Value

- Strengthened media pluralism
- Cross-border public discourse
- Inclusion of minority languages and independent/civil society voices

Security Value

- Reduced structural dependency on non-European platforms
- Increased resilience against coordinated disinformation

Economic and Industrial Value

- Strengthened AI competitiveness
- SME integration into scalable data ecosystems
- Reduced external value extraction

Cultural Value

- Protection of linguistic diversity
- Enhanced cross-cultural understanding

Conclusion

Europe's digital transformation has profoundly reshaped how citizens access information, how democratic discourse unfolds and how cultural and linguistic diversity is represented. Yet this transformation has produced structural dependency on non-European platform infrastructures for distribution, discoverability and monetisation.

This dependency is no longer merely a market issue. It is a matter of digital sovereignty, democratic resilience, security and competitiveness.

The EU's Apply AI Strategy foresees the development of pan-European platforms using multilingual AI technologies to provide real-time news and information across borders.

Such an initiative could represent a decisive step towards a sovereign European media infrastructure. However, there is a risk that this endeavour might concentrate efforts — including funding — primarily on establishing user interfaces and AI pipelines. Experience from large-scale digital projects shows that the greater challenge typically lies in ensuring data readiness: harmonised metadata, interoperable standards, trusted governance and scalable integration across diverse actors. Without systematic investment in these foundations, even the most advanced platform architecture will struggle to achieve scale and legitimacy.

For such an initiative to succeed, technological development must be aligned with ecosystem integration. Multilingual AI-enabled platforms can only achieve scale, diversity and legitimacy if participating media actors—across public service, commercial and independent/civil society sectors—are technically and organisationally able to operate within a shared, interoperable and federated infrastructure.

Integration does not refer only to data readiness. The Commission's proposal refers to supporting pan-European news platforms—and this plural form is fundamental. As we observe with large digital platforms, the idea of a single platform to represent the diversity of our societies hasn't worked. The idea of a single platform where all actors operate is unlikely to reflect Europe's structural diversity. It can therefore be assumed that a European Digital Public Space will likewise require a federated and plural architecture.

To ensure full diversity, democratic pluralism and legitimacy, such platforms should be cross-sectoral (public service media, publishers and independent/civil society media) and format-agnostic, integrating text, audio, video and emerging formats from the outset. There are already examples of European media infrastructure integration that can serve as building blocks and should be incorporated into the ecosystem.

This paper proposes the development of a European Digital Public Space: a federated, sovereign and democratically governed infrastructure for media distribution, AI-enabled discoverability and cross-border cooperation

In short:

- **Europe does not lack regulation.**
- **Europe does not lack analytical studies.**
- **Europe must now ensure operational infrastructure capacity.**
- **A pan-European news initiative should evolve not merely as a technological platform, but as a federated, cross-sectoral, format-agnostic and democratically governed European Digital Public Space.**
- **By aligning AI development, interoperable data environments and sovereign distribution infrastructures, Europe can strengthen its democratic resilience, technological competitiveness and cultural diversity in a single strategic move.**

Annex: Examples of Sovereign and Cooperative Digital Media Infrastructure

1. TEMS – Trusted European Media Data Space

European initiative developing interoperable, trusted media data infrastructures and harmonised metadata standards enabling secure sharing and reuse of journalistic content across borders. TEMS has established a common data model, interoperability architecture and governance framework bringing together public service broadcasters, publishers, news agencies and independent/civil society media for the first time at the European level

https://tems-dataspace.eu/

2. Display Europe Coop (Independent/civil society media)

A news aggregator in newsfeed format, based on the Repco data space with 66 partner media from independent/civil society media across Europe, whose data is automatically ingested into a central database. Display provides media content in any format (text/audio/video) in 21 languages (including major European languages such as Ukrainian or Russian, as well as Turkish).

The Display newsfeed shows a teaser; when users want to read or view the full content, they are redirected to the partner site, where it is served in their language. The traffic thus benefits the partners. Through backlinks, users can be directed back to the Display portal.

https://displayeurope.eu/

3. YEPnews (Public Service Media)

EBU/Public service media cooperation enabling cross-border visibility of national journalism. Content is presented in 5 languages, with a referral button that directs users to the originating broadcaster's platform, maintaining source attribution and traffic flows. The initiative aggregates selected news contributions from participating public broadcasters, curates them for a European audience, and provides multilingual access to nationally produced journalism. By combining editorial curation with structured referral mechanisms, YEPnews strengthens cross-border awareness while preserving the original media outlets' autonomy and reach.

4. European-Level Networks

- **European Newsroom (ENR)**: Cooperation of European news agencies enabling cross-border journalistic exchange.
- **European Data Journalism Network (EDJNet)**: Collaborative investigative and data journalism network across Member States.
- **European Digital Media Observatory (EDMO):** European hub coordinating fact-checking networks and research on disinformation.

These initiatives demonstrate sectoral cooperation models that could interface with a federated infrastructure.

5. National Examples

DRIVE (Publisher)

DRIVE is a collaborative data-sharing project launched in 2020 by the German Press Agency (*Deutsche Presse-Agentur – dpa*) together with the management consultancy formerly known as Schickler (now Highberg) and around 30 regional publishers from Germany, Austria and Switzerland. It aims to help regional news organisations increase digital subscription revenues by pooling anonymised usage and content data in a shared data warehouse, enabling cross-publisher analyses, benchmarking, and the development of personalised and AI-supported audience-engagement tools.

cba.media

Non-profit, open-source distribution infrastructure for community broadcasting in Austria/DACH, hosting 180,000 contributions in 50 languages, operating independently from Big Tech platforms and enabling interoperable distribution via APIs and RSS feeds.