



**European
Federation
of Journalists**

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EFJ Position on the Review of the Communication from the Commission on the Application of State Aid Rules to Public Service Broadcasting

The European Federation of Journalists (EFJ), the European group of the International Federation of Journalists, is the largest journalists' organisation in Europe. It represents over 260,000 journalists in 34 countries. The full list of member organisations is in annex of this document.

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1. GENERAL

1.1. A number of significant legal developments have taken place in the public broadcasting area since 2001, namely the adoption of the Audiovisual Media Services Directive, the adoption of the Decision and Framework on compensation payments as well as Commission decision-making practice. Do you think that the Broadcasting Communication should be up-dated in light of these developments? Alternatively, do you consider that these developments do not justify the adoption of a new text?

EFJ Position:

The Communication on the application of State aid rules to public service broadcasting adopted in 2001 (hereafter “the PSB Communication”) was followed by various legal developments such as case law on state aids and the adoption of the Audiovisual Media Services Directive (hereafter “AVMS Directive”).

The AVMS Directive contains an updated definition of broadcasting and delivers a clear and yet flexible definition of broadcasting services in the digital economy. Although from a legal point of view there is no direct relationship between the AVMS Directive and the PSB Communication these two legal developments are coherent and complement each other. The PSB Communication and the AVMS Directive constitute a solid and flexible framework, which takes into account the specificities of the sector and its dynamics. We believe that the current legal framework is solid and flexible enough to function well in the immediate and medium future.

This shows that EU legislation can take into account the dynamics of the technological developments, in particular the digital convergence resulting in the emergence of new platforms of distribution and new broadcasting services.

However, according to Article 11 of Charter of Fundamental Rights of the European Union, the EU guarantees Freedom of expression and information¹. According to Art. 6 of Lisbon Treaty, the Charter has the same legal values as the EU Treaty. In this extent, Art 11 of the Charter sets for the first time the right and the defence of pluralism in mass media in European law, and the duty for the European institutions to enforce this right. In our view, this implies the respect of the dual public/private broadcasting system and reinforces the importance of the Amsterdam Protocol on public broadcasting².

¹ 1. *Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers.*
2. *The freedom and pluralism of the media shall be respected.*

² *CONSIDERING that the system of public broadcasting in the Member States is directly related to the democratic, social and cultural needs of each society and to the need to preserve media pluralism,*

In line with the Protocol Member States can and do formulate remits for public service broadcasting that are much broader than the scope of the AVMS Directive (such as radio and interactive services for example).

New legislation has to enable public service broadcasters to fulfil their public service missions and evolve with the same dynamic as other players in the audiovisual sector. An eventual update of the PSB Communication needs to guarantee the fundamental role of public service broadcasting in the digital environment as expressed in the AVMS Directive and the Resolution of the Council of Ministers on Public Service Broadcasting (1999) as well as the in the Recommendation of the Committee of Ministers of the Council of Europe on the remit of public service media in the information society (2007).

Any new text needs to ensure that public service broadcasters will be able to continue to develop new services and offer access to citizens on all available existing and future distribution platforms, including with state aids as defined in the Amsterdam Protocol, *i.e. insofar as such funding is granted to broadcasting organisations for the fulfillment of the public service remit as conferred, defined and organised by each Member State, and insofar as such funding does not affect trading conditions and competition in the Community to an extent which would be contrary to the common interest.*

1.2. How would you describe the current competitive situation of the various players in the audiovisual media sector? Where available, please provide the relevant data on for instance leading players, market shares, market share evolution in the broadcasting/advertising/other relevant markets.

EFJ Position:

As shown in various reports, in particular a survey produced by the EFJ itself in 2003³, media concentration has been on the rise in all parts of Europe in the last fifteen years, including in the broadcasting sector.

The increase of media concentration means that media ownership is no longer local in nature and is not even anymore limited to national markets. It is increasingly transnational and even multi-continental.

Additionally, media concentration is more and more vertically and diagonally integrated: big media players have interests in several media markets. Media companies are active in publishing, broadcasting and online media. The problem of cross-ownership is that content can be used and (re)used on the several media of the company and that the production of the content is concentrated in common “pools”, which reduces both the workforce and content diversity (*see also question 1.3*).

In Central Eastern Europe foreign investment plays an important role. The encroachments by Western media groups have prevented or made difficult the development of

³ *Media Power in Europe: The Big Picture of Ownership* <http://www.ifj.org/default.asp?Index=3671&Language=EN>

nationally-based media groups in these countries. In the broadcasting sector, commercial television and to a lesser extent radio are in many countries owned by a hand full of western companies. Public service broadcasters are expected to contribute to diversity, but the fact remains that they do not always do so.

In short, the broadcasting market in Europe is characterised by fragmentation of market shares (increase of channels) and a high concentration of ownership with growing multinational groups.

Commercial broadcasters have increased their advertising revenues and are expected to increase further due to new opportunities (new techniques and more flexibility is allowed under the new AVMS Directive). New media platforms are gaining importance and the presence of new players such as telecom companies in the digital economy will continue to increase.

Several public service broadcasters have been subject to restrictions on their revenues (e.g. in UK, Spain, France and in several new Member States), which led to restructuring and job losses as well as cuts in original production. The EFJ is alarmed by projects and announcements in France, Portugal and Poland to cut all advertising revenues for public service broadcasters without any previous consultation with the broadcasters and without any serious plans to ensure the sustainability and development of the public service broadcasters in such a scenario. These projects have been introduced by public authorities put under pressure by commercial broadcasters and lacked dialogue with the workforce.

1.3. *In your view, what are the likely developments and where do you see the major challenges for the sector in the future? Do you consider that the current rules will remain valid in the light of the developments or do you believe that adaptations will be necessary?*

EFJ Position:

According to the experience of professional organisations of journalists, the main developments and challenges are the following:

- Telecommunication companies play an increasing role in the broadcasting sector, not only from a financial point of view (shares in audiovisual media services providers) but also contentwise. Main telecom companies are likely to increase their control over media content in the coming years. As a consequence, journalists are worried by a decrease of professional standards, of editorial independence, of quality content and working conditions in such a vertically integrated environment.
- The distribution of content will be made through a large variety of technical platforms (television, radio, online, mobile phone or any audiovisual media services) but the content management is increasingly centralised in common “pools” or “newsdesks”. Whereas each newspaper, TV or radio used to have its

own newsroom, programmes are now produced by joint newsdesks employing “multiskilled” journalists and media workers. The EFJ is extremely concerned by this development which reduces not only costs and workforce, but also quality, pluralism and diversity of views.

- Media concentration, and in particular cross-media ownership (see point 1.2) leads to a industry which is driven by audience, market shares and commercial revenues. In our view the market is not able to guarantee pluralism, independence and quality programmes on its own. Commercial broadcasters cannot fulfill a public service mission and this is why public broadcasters have to be able to carry out a full public service remit. Regulations at Member States level may need to be adapted in order to allow public service broadcasters to adapt their remit to technological change and the digital environment in order to access to public service broadcasting services.
- Switch from analogue to digital resulting in increase of channels available and fragmentation of audiovisual market. In our view, the fragmentation of the audience share and the growth of new audiovisual media services in particular on demand services will lead to a decrease of market power of public service broadcasters within the traditional broadcasting sector and within the whole audiovisual sector. The difference between revenues from public funds and advertising may increase further.

Other developments are:

- Increase of online consumption and in particular of on-demand services.
- Advertising spending will become more important on new media platforms than on traditional media.
- Increase of mobile services.

2. COMPATIBILITY ASSESSMENT UNDER ARTICLE 86 (2) EC TREATY, IN COMBINATION WITH THE BROADCASTING COMMUNICATION

2.2. Definition of the public service remit

2.2.2. Do you consider that the distinction between public service and other activities should be further clarified? In the affirmative, which measures could provide such clarification (e.g. establishment by the Member State of an illustrative list of commercial activities not covered by the public service remit)?

The EFJ believes that the definition of the remit is the competence of each Member State and that differences in the definitions reflect the cultural specificities of each state. In our view there is no need for further clarification between public and other activities. As stated in 1.1, the public service remit should take into account technological developments and the emergence of new platforms of distribution and new broadcasting services.

2.2.3. *In the current Broadcasting Communication, activities other than TV programmes in the traditional sense can be part of the public service remit provided that they serve the same democratic, social and cultural needs of society. Does this provision sufficiently clarify the permissible scope of such public service activities? Why? In the negative, do you consider that further clarifications should be provided in a revised Broadcasting Communication?*

EFJ Position:

Again, an evolutive definition of broadcasting is a key element to take into account for activities and services provided by public broadcasters. It is necessary to ensure the availability of public service broadcasting and new public audiovisual media services on all distribution platforms in the future. Technological neutrality and public access have to be respected in order to preserve Europe's unique dual broadcasting system. This view is also expressed in the Recommendation of the Committee of Ministers of the Council of Europe on the remit of public service media in the information society (2007).

In this extent, the EFJ thinks that the means of distribution are not relevant for clarifying the permissible scope of public service broadcasting activities. In other words, the crucial criteria is not the platform, but the content, which needs to respond to the democratic, social and cultural needs of society. New services have to respond to the same criteria as traditional TV programmes.

In our opinion the Commission should not propose new measures and we do not see the need for further clarifications. In the past years, financing of public broadcasting has been regularly and constantly challenged at EU level according to the impact on commercial competitors. In our view, public service broadcasting should not always need to justify itself as an exception.

2.2.4. *Do you consider that the general approach in the recent decision-making practice of the Commission (i.e. determination of the public service remit based on an ex ante evaluation for new media activities) could be incorporated into a revised Broadcasting Communication?*

And

2.2.5. *Should a revised Broadcasting Communication further clarify the scope of an ex ante evaluation of the public service remit by Member States?*

And

2.2.6. *Which services or categories of services should in your view be subject to an ex ante evaluation?*

And

2.2.7. Should a revised Broadcasting Communication contain the basic principles as regards the procedural and substantive aspects of such an evaluation (such as for instance the involvement of third parties or the possible evaluation criteria, including for instance the contribution to clearly identified objectives, citizen needs, available offers on the market, additional costs, impact on competition)?

And

2.2.8. In view of the fact that the determination of the public service character of such activities may be determined in various ways, to what extent should a revised Broadcasting Communication set out possible different options?

EFJ Position:

The EFJ wishes to point out the following remark about questions 2.2.4 to 2.2.8:

- An ex-ante evaluation would go against the subsidiarity principle and the established competence of Member States to define the public service remit;
- Public service broadcasters enjoy editorial independence. This is very important to ensure quality programming and objective information services free from political pressure or interference. We believe that an ex-ante evaluation for new media service would open up possibilities to interfere with the editorial independence of public service broadcasters.

2.3. Entrustment and Supervision

2.3.3 Do you consider that the Broadcasting Communication should contain further clarifications about the circumstances in which an additional act of entrustment (i.e. in addition to the general provisions laid down by law) is necessary or are the current rules sufficient?

EFJ Position:

In our view it is not necessary to provide further clarifications about the circumstances in which an additional act of entrustment is necessary in the PSB Communication because such additional attributions would be conflictual with editorial independence. The implementation of the PSB mission goes together with the definition of editorial policy.

2.3.5 Should there be specific complaints procedures at national level where private operators could raise issues related to the scope of the public service broadcasters' activities? If so, what form should they take?

EFJ position:

As already written for questions 2.2.3 and 2.2.8, the EFJ is opposed to the idea that private interests of commercial broadcasters may influence the definition of public service broadcasting.

2.4 Dual Funding of public service broadcasters

2.4.1. What is – in your view - the expected impact of (partly) State-funded pay-services on competition?

And

2.4.2. Should pay-services always be considered as purely commercial activities or are there instances in which they could be regarded as part of the public service remit?

EFJ Position:

In the view of the EFJ, pay-services (pay-TV, per-per-view, etc) are not part of the fulfillment of a public service remit since services should be universally accessible and free at the point of use.

From our viewpoint, if pay-services are offered they need to be justified as an additional service, which cannot be provided within in the current financing situation. In any case the fees need to be reasonable and should strictly cover the costs of the service.

We take the example of archives: online catch-up services may offer the possibility to download programmes after they have been shown on TV or in some cases as a digitalised version of magnetic programmes. This operation may require an adequate fee to cover the technical or administrative costs, as well as a fair remuneration of creators and other rights holders who have contributed to the production of the programme.

This example is not exhaustive. It is the view of the EFJ that pay-services should be limited to a non-profit use in order to strictly cover specific costs for services that may broaden the ranger of access to public service content.

2.5 Transparency requirements

2.5.2. Do you consider that there is a need for a structural or functional separation of commercial activities, and if so why? What would the positive or negative effects of either a structural or a functional separation?

EFJ position:

Financial transparency is important to guarantee the separation of public service and commercial activities. In our opinion the provisions the Transparency Directive provide a coherent and sound framework to regulate the separation of public service and commercial activities.

Structural or functional separation would result in the same objective being achieved, but with additional costs which would be out of proportion to the objectives to be attained. Functional separation may be an appropriate and adequate solution for the very large public service broadcasters. However, small broadcasters would have to bear additional, disproportional costs. Therefore we think that an obligation for functional or structural separation should not be included in the PSB Communication.

2.6. Overcompensation

2.6.1 *Do you consider that the Broadcasting Communication should include a requirement for Member States to clearly lay down the parameters for determining the compensation amount?*

EFJ Position response:

The determination of the funding mechanism and the financial needs of the public broadcasters is an exclusive competence of the Member States, in line with the Amsterdam Protocol and the case law on this issue.

For this reason, for example, we do not see on what legal basis a public broadcaster would have to automatically return the surpluses to the state. Indeed such an approach is based on strictly commercial criteria where public service broadcasting is an exemption to be restricted or specially justified.

2.7. Proportionality test – exclusion of market distortions not necessary for the fulfilment of the public service mission

2.7.4. *Do you consider that the Broadcasting Communication should contain clarifications as regards the public funding of premium sports rights? In the affirmative, what further requirements should in your view be included in the Broadcasting Communication and how would they specifically address potential competition concerns resulting from State funding? Alternatively, do you think that potentially adverse effects on competition due to the acquisition of such rights by public service broadcasters would be sufficiently addressed under the antitrust rules?*

The EFJ defends the principle of free access to event of public interest and has protested in many occasion about exclusive rights during sports events -for example a major dispute took place in 2007 with the International Rugby Board. As a matter of principle, public broadcasters should have access to information on major sports events.

ANNEX:

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