

2016 Annual Colloquium on fundamental rights Public consultation* on "MEDIA PLURALISM AND DEMOCRACY"

Fields marked with * are mandatory.

Introduction

Media freedom and pluralism are essential safeguards of well-functioning democracies. Freedom of expression and media freedom and pluralism are enshrined in the EU Charter of Fundamental Rights and they are at the core of the basic democratic values on which the European Union is founded.

The second Annual Colloquium on Fundamental Rights will take place on 17-18 November 2016. It will provide the stage for an open exchange on the many different aspects of media pluralism in a digital world, and the role of modern media in European democratic societies.

The colloquium should enable policymakers at EU and national level and relevant stakeholders — including NGOs, journalists, media representatives, companies, academics and international organisations — to identify concrete avenues for action to foster freedom of speech, media freedom and media pluralism as preconditions for democratic societies.

The Commission's objective with this public consultation is to gather broad feedback on current challenges and opportunities in order to feed into the colloquium's discussions. The questions asked are thus meant to encourage an open debate on media pluralism and democracy within the European Union — without, however, either prejudging any action by the European Union or affecting the remit of its competence.

**Wichtig - Öffentliche Konsultation (auf deutsch) / Important -
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*Contributions received from this survey will be published on the European Commission's website. Do you agree to the publication of your contribution?

- Yes, my contribution may be published under my name (or the name of my organisation);
- Yes, my contribution may be published but should be kept anonymous (with no mention of the person/organisation);
- No, I do not want my contribution to be published. (NB — your contribution will not be published, but the Commission may use it internally for statistical and analytical purposes).

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A. Identifying information

1. In what capacity are you completing this questionnaire?

- Individual/private person
- Civil society organisation
- Business
- Academic/research institution
- Other (please specify)

2. If you are answering this consultation as a private citizen, please give your name.

3. If you are answering this consultation on behalf of an organisation, please specify your name and the name of the organisation you represent.

Krisztina Rozgonyi; Media Governance and Industries Research Lab, University of Vienna

Is your organisation included in the Transparency Register?

- Yes
- No

If yes, please indicate your Register ID-number

Media3314401793

If your organisation is not registered, we invite you to register [here](#). Please note that it is not compulsory to register to reply to this consultation. Responses from organisations that are not registered will be published as part of the individual contributions.

Citizens have a right to expect that European institutions' interaction with citizens associations, NGOs, businesses, trade unions, think tanks, etc. is transparent, complies with the law and respects ethical principles, while avoiding undue pressure, and any illegitimate or privileged access to information or to decision-makers. The Transparency Register exists to provide citizens with direct and single access to information about who is engaged in activities aiming at influencing the EU decision-making process, which interests are being pursued and what level of resources are invested in these activities. Please help us to improve transparency by registering.

4. If you are an individual/private person:

a) What is the country of your nationality?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other (please specify)

Other (please specify)

b) What is your age group?

- Under 18
- 18-30
- 31-40
- 41-50
- 51-60
- 61-70
- Over 71

B. Media freedom and pluralism

5. In the context of media freedom and pluralism, what should be the role of the State, if any, in the regulation of media? What should be the role of self-regulation?

Historically, it has been proven that an inactive State in terms of regulating ownership concentration has resulted into oligopolies and effective monopolies in media landscapes in Europe. Not only have media industries merged within the borders of member states, but they also connect with concentration tendencies across borders (1), with the aim to gain a dominant position in the market. Hence, long-term State withdrawal from regulating the media ownership has resulted in concentration of the media industries. This dominant position of the resulting oligarchies have been instrumental in steering policy in a number of cases in the EU, notwithstanding the role the media played in the EU referendum in influencing public opinion with inaccuracies, almost unchecked by self-regulatory systems (2). Hence, historically, we have seen that self-regulation alone does not suffice. Self-regulatory bodies have limited effect on protecting pluralism and this is visible in various cases from the UK and Austria, to Greece, Hungary, Poland, Italy, Portugal to name a few cases.

The State's role is to lead in setting up processes whereby the broadest possible sections of society are represented in independent regulatory and monitoring bodies, which can co-exist with self-regulatory bodies. Apart from providing the legal framework within which such bodies will operate and providing for their independence, the State's role should be to initiate regulation that takes into account a combination of factors: of overall market dominance at any regional level and nationally of a company, market position on a European wide scale and finally position in terms of specific media outlet market position to determine the ways in which market position limits or potentially may limit pluralism.

Moreover, the State must provide clear frameworks for the role of media in election periods to guarantee the democratic debate and protection against misinformation(3).

(1) Report on media ownership in Europe, forthcoming, Media Governance and Industries research Lab

(2) See the Loughborough University Study for a comprehensive report on media coverage of the EU referendum; also Wayne, M (forthcoming) Beneath the Bias, the Crisis: The Press and the Scottish Referendum In The International Journal of Media and Cultural Politics on the Scottish referendum.

(3) See Council of Europe, Venice Commission Guidelines for Media in Elections

6. Could you provide specific examples of problems deriving from the lack of independence of media regulatory authorities in EU Member States?

Media regulators in Europe are key actors in safeguarding pluralism, and their independence is a crucial factor in this role. However, there have been recent cases in which these regulators are formally compliant with set legal requirements on independence, but in reality act very differently and enforce rather political agendas, thus not serving the public at large. Within the

current European policy framework (1) there are no safeguards and no entities to ensure independent operation of those regulators. Recent research projects have also highlighted the need for policy change and argued for a more 'activist' role for the EU, as well as the need to establish a monitoring system at the European level to evaluate the independence of national regulatory authorities on the basis of specific, evidence-based criteria (2).

Our research on the operation of the Hungarian media regulator - with special regard to its market entry procedures and sanctioning practices - has shown serious anomalies in terms of plurality of market entrants and diversity of the voices they have represented as well as proportionate and non-discriminatory sanctions applied by the regulator. (For example, the Hungarian NRA has contributed to the increase of the coverage area of a single radio station by 13 frequencies between 2010 and 2013, and this radio has won in all cases in which it submitted any valid application. And all of the frequency tender decisions - and most of the NRA's decisions - are unanimous, strongly signalling limited independence at the NRA's work.) These anomalies can only be derived by a deep analysis of the NRA's entire practice.

The paradox, we have observed, that the Hungarian "super authority" was considered as formally compliant with European requirements (3), despite the anomalies in its operations. Therefore, we have argued to consider the ways in which accountability of these institutions could and should be improved. We have proposed complementing independence indicators with conclusions derived from reviewing the NRA's actual work and decisions, focusing on transparency of decision-making (e.g. availability of detailed justification of decisions; frequency of public consultations and their impact), on market entry procedures (e.g. the intensity of competition in tender procedures) and on sanctioning practices (e.g. public availability of the criteria employed in applying sanctions and the consistency of their application).

The preferred means to strengthen European control mechanism is through the establishment of a monitoring system that evaluates independence on the basis of specific, evidence-based criteria. We offer new approaches to re-focus on governance mechanism monitoring of regulators: a proper assessment of the authority's work calls for investigating transparency, and reviewing how it conducts market entry proceedings and levies sanctions. The ongoing review process of the European audiovisual policies offers a great opportunity to take new directions. (4)

(1) We refer inter alia to the AVMS Directive Recital (94), Article 30; the ECHR Article 10; the TFEU Article 288 para. 3; the Framework Directive Recital (11) and Article 3 and 3a and the Review Directive Recital (13) and Article 1; also to Council of Europe, Recommendation No. R (2000) 23 and to Council of Europe, Declaration of the Committee of Ministers of 26 March 2008 on the independence and functions of regulatory authorities for the broadcasting sector.

(2) INDIREG study, Freiberga Report and RSCAS PP 2013/01 report. See Wolfgang SCHULZ / Peggy VALCKE / Kristina IRION (eds.), *The Independence of the Media and its Regulatory Agencies*, Intellect Ltd. (2014)

(3) See the agreement between the Council of Europe and the Hungarian Government in Jan 2013.

(4) Dr. Gabor Polyak (Associate Professor, University of Pecs) has also contributed to answering this question.

7. What competences would media regulatory authorities need in order to ensure a sufficient level of media freedom and pluralism?

The Study on Audiovisual Media Services – Review of Regulatory Bodies Independence commissioned by the European Commission in 2011 (hereinafter: INDIREG Study) have assessed the combined competences of rulemaking and rule application of media regulatory authorities necessary for their optimal operations. The main characteristic of competencies envisioned by the INDIREG Study are:

- Status and powers – the regulatory body to be equipped with powers that ensure the implementation of the law and enforcement of adequate sanctions;
- Financial autonomy – sufficiency of financial resources and autonomy in the allocation thereof;
- Autonomy of decision makers – a system of checks and balances in place that ensure the prevention of structural bias in the nomination and appointment procedures (including the length of the tenure);
- Knowledge – the necessity for adequate expertise by staff and by the board of the regulator.

We agree that these characteristics of the key competencies of any regulator are inevitable to ensure a sufficient level of media freedom and pluralism in their operation. We further believe, that it is rather the impartiality of the decision making process and the accountability of the regulator while exercising its regulatory powers within a framework of democratic governance mechanisms that matters in regards to media pluralism.

Therefore the introduction of enforceable normative criteria in EU legislation – as we have argued at Q B6 – implemented by the mechanisms and tools available for the EC, the EP and the European Court of Justice, could significantly enhance accountability of regulators and thus contribute to the justification of their democratic legitimacy.

8. What should be the role of public service media for ensuring media pluralism?

The role of the public service media is by default one where the aims and values of universality and pluralism are paramount for the fulfilment of their public service mission.

For that purpose

- a. there must be guarantees for the sustainable development of PSBs in Europe and their universal reach, there where the audiences are, including geographical spaces and media spaces, such as social ie online media
- b. there must be stronger respect in practice for the Amsterdam Protocol and Article 10 of the European Convention of Human Rights and Fundamental Freedoms
- c. the State must guarantee the journalistic and governing independence and financial viability of the PSBs
- d. PSBs should aim at institutionalising the direct and meaningful participation of society at large as a source of direction, content, and innovation that can be integrated in the governing processes of the PSBs and this way support the plurality of voices.

9. How should public service media be organised so that they can best ensure the public service mandate?

The function of PSBs is one that has overall, despite organisational problems, proven successful in serving the public interest.

The main characteristic of malfunction is lack of journalistic independence, lack of political independence at the level of governing bodies and lack of financial viability.

PSBs should be organised the way in which they fit the societies in which they serve. The crucial issue here are guarantees in law and implementation of the aforementioned conditions.

Also see B8.

10. Have you experienced or are you aware of obstacles to media freedom or pluralism deriving from the lack of independence of public service media in EU Member States?

- Yes
 No

If yes, please give specific examples.

In Poland, the government that came to power in 2015 subsequently rushed through legislation jeopardizing the independence of the public broadcaster (International Press Institute, 2016). The amended Media Law empowers the Minister of State Treasury to at will appoint and dismiss the broadcaster's supervisory and management board members, a move that eliminates the checks and balances system necessary for the broadcaster's independence. The Public Service Media in Poland, especially TVP has been dominated by the decisions of the ruling party. The new director Jacek Kurski admits openly that he got

nominated because of his political affiliation. Over 150 journalists lost their job, among them many front faces of Polish journalism and some “too liberal” programs have been taken down (like very famous opinion making program “Tomasz Lis na żywo”). Many journalists got fired because they criticised openly the new government (like one of the most loved sport commentators Tomasz Zimoch from Polish Radio or Jerzy Sosnowski – a radio journalist). After the elections and announcements about planned changes in media law the at that time director of the 1st program of the Polish Radio Kamil Dąbrowa decided to play before each hour breaking news the European Hymn “Ode to Joy” with his voice explaining that this is the protest against the limitations to freedom of expression. He lost his post in January on the day when the new media regulation came into effect.

There are many considerations in Poland about the content of the news in public media that became very biased. I.e. a very uncomfortable for the government protest of nurses from the Centrum Zdrowia Dziecka that lasted for several days has not been covered by the TV news service “Wiadomości” or the reports from the protests of the oppositional movement KOD have been manipulated showing only few participants whereas the streets were full with demonstrators. Also, a significant number of senior Polish public media journalists have already lost their jobs and others have left in protest at what they regard as the erosion of public media independence in Poland (Korbiel 2016). As a result of the ‘disappearance’ from the screen of Polish public television, of some of the most well-known journalist faces, the broadcaster’s main evening news show lost half a million viewers (Korbiel 2016).

In Hungary, meanwhile, media laws relating to public media passed in 2010 and 2011 are on the whole inconsistent with European media regulation systems and practices (Centre for Communication and Media Studies 2012 with the contribution of Prof. Sarikakis). Also, these inconsistencies encompass the role of the Hungarian Media Council in appointing the directors of public media outlets and its management of the funding body for Hungarian public media (International Press Institute 2016). The Policy Report on Monitoring Media Pluralism in Europe – Testing and Implementation of the Media Pluralism Monitor 2014 (Policy Report–December 2014) (hereinafter: MPM 2014), commissioned by the European Parliament and the European Commission has signalled high risks for media pluralism in the case of Hungary in regards to „regulatory safeguards for locally oriented and locally produced news on Public Service Media (hereinafter: PSM) channels and services“ (Indicator 10), to „fair, objective and transparent appointment procedures for PSM professionals and management boards“ (Indicator 17) and to „regulatory safeguards for the objective and independent allocation of (adequate, consistent and sufficient) financial resources to PSM“ (Indicator 19) (MPM 2014: 106). Since the publication of the MPM 2014 report, the Freedom House 2015 Press Freedom Report on Hungary has indicated continued 5-year decline in press freedom in the country, even deteriorated slightly in 2014. Editorial bias and political pressure were reported as growing problems at public media outlets, along with the centralization of the funding and content production for all public media.

The recent IRIS Study (IRIS Special – Public Service Media and Online Content 2015) on funding of the Hungarian PSM has also highlighted deficits in the financial accountability of the PSB and the lack of control powers in their

utilization, also signalling problems to the independent operation of the PSM system.

We believe, that the case of the Polish and of the Hungarian PSM indicates obstacles to media freedom or pluralism deriving from the lack of independence.

Further references:

Poland: IPI-EFJ-ECPMF urge government to guarantee public broadcasting independence.

<http://www.freemedia.at/poland-ipi-efj-ecpmf-urge-government-to-guarantee-public-broadcasting-independence/>

Korbiel I (2016) Wind of (Good) Change.

<https://univiennamedialab.wordpress.com/2016/05/26/wind-of-good-change/>

Center for Communication and Media Studies (2012) Hungarian Media Laws in Europe

11. Are you aware of any problems with regard to media freedom and pluralism stemming from the lack of transparency of media ownership or the lack of rules on media ownership in EU Member States?

- Yes
 No

If yes, please give specific examples.

Although media freedom and ownership pluralism have been on the EU agenda for quite a while, most of the member states do not have transparent ownership structures. There is also a hidden conflict between member states and the European Commission, as it is in many other policy fields. By not applying regulation tools, the national regulator and the state keep power to themselves rather than following common EU policies. They don't want to give away their power to regulate domestic media. (Gálik 2010: par 36f)

In the Policy Report on Monitoring Media Pluralism in Europe - Testing and Implementation of the Media Pluralism Monitor 2014 (Policy Report-December 2014) (hereinafter: MPM 2014), commissioned by the European Parliament and the European Commission, three key indicators for the risk domain ownership are pointed out, namely high ownership concentration in the media, high concentration of cross-media ownership and lack of transparency in ownership structures. In all countries tested in 2014 (9 EU MSs) the risk of high concentration in media ownership is high (high risk means four of major owners have a market share of more than 50% see page 42). Also for the indicator cross-ownership the report realizes a high risk for 7 of 9 countries. Only the risk lack of transparency is low or medium in 8 countries.

Among EU MSs, the case of Hungary could also serve as an example to the problems in regards to media ownership transparency and regulation. The MPM 2014 Report has signalled high risks for media pluralism in the case of Hungary, with a special emphasis on regulatory safeguards against high concentration of ownership and/or control in media (Indicator 12) (MPM 2014: 106). Although regulatory safeguards for transparency of ownership and/or control (MPM 2014: 105) scored as medium risk (Indicator 14), it has been also revealed, that „...the rules regarding transparency of media ownership do not provide sufficient safeguards to ensure public accountability for compliance with anti-concentration rules“ (MPM 2014: 105) demonstrating risk to pluralism.

Since the publication of the MPM 2014 report, in 2015, a detailed analyses by investigative journalists, of more than eighty-thousand procurement and advertising data entries has described and visualized how did the politically motivated changes between 2010-2015 in Hungary in the advertising and media market fundamentally altered ownership structure of the media landscape, with beneficiaries of the political system, also reflecting the “outflow of foreign capital and of the know-how as one of the most characteristic indicators of a profoundly ill market sector” (How did the Orbán-Simicska media empire function?, 2015: Concluding remarks)

We believe, the Hungarian case shows clear evidence to threats of media freedom and pluralism, and is among those, that recalls the need for clear rules of on media concentration and the transparency of ownership.

Further references:

Gálik, M. (2010): Concentration within the Council of Europe and the European Union. In: Klimkiewicz, B. (ed.). Media freedom and pluralism: Media policy challenges in the enlarged Europe. Budapest [u.a.]: CEU - Central European Univ. Press

12. Please indicate any best practice on how to ensure an appropriate level of transparency and plurality of ownership in this area.

The seminar on Exchange of best practices on transparency of media ownership organized by the European Commission in 2014 - found that transparency rules are often only open for the regulator and not for the public. Also, the practices and democratic culture in the member state plays a crucial role: Finland, for example, does not have sector specific rules, but transparency is included in "company law, self-regulation and a democratic culture of transparency". Robert Madelin (Directorate General for Communications Networks, Content and Technology) mentioned Austria besides Croatia in his statement as one of the countries that "deliver good results" in media ownership transparency, because of its sector-specific transparency rules. We have undertaken further analyses on the Austrian case and we believe, it could serve as a best practice in terms of rules in regard to transparency, but with due attention to their limited impact re: concentration on the market.

According to the MPM2015 Report, all three indicators in the 'Market Plurality' domain show medium risk in case of Austria (however only slightly above the threshold). The rules on transparency requirements (and the administrative penalties imposed in case of breach of them) have contributed to regulate the markets and to tackle horizontal and cross-media concentration. Regulatory authorities (KommAustria) have control over spectrum rights, as well as over private and public broadcasters. Also Cartel Law (Kartellgesetz §7) has specific rules on media ownership and on mergers of media outlets, although it has not been efficient in the last years. However, lack of data on Internet service providers or Internet content providers have been subject to critics.

The impact of transparency rules on concentration of the markets is rather limited, as Austria is characterized with strong media concentration and high amount of cross-media ownership (Trappel, 2008). Despite of strict regulations of the television (Audiovisuelle Mediendienste-Gesetz §11) and of the radio market (Privatradiogesetz §9) on ownership concentration (also in terms of cross-ownership), the market share of the Top 4 audiovisual media owners is above 50% (MPM2015 Report). For example, when the Privatradiogesetz was enacted in 2001, media owners were only allowed to own 30 % of the regional share, but they were allowed to merge with other media companies, and especially publishing companies entered the radio market at that time.

Regarding the regulation of transparency in media ownership, Austria could serve as a good example amongst EU MSs, however the concentration of media ownership is very high, as well as there are only a few actors that influence the whole media market. Transparent regulations of media ownership may not be the only way to ensure plurality in ownership, but are as a pre-requisite to informs regulators as well as the public.

Further reference:

Trappel J. (2008): 1. Austria. In: Kelly, M., Mazzoleni, G., & McQuail, D. (ed.). The Media in Europe: The Euromedia Research Group. London et al. SAGE Publ.

13. What is the impact of media concentration on media pluralism and free speech in your Member State? Please give specific examples and best practices on how to deal with potential challenges brought by media concentration.

See answer at B12 in regards to Austria.

14. Are you aware of any problems related to government or privately financed one-sided media reporting in the EU?

- Yes
- No

If yes, please give specific examples.

15. Please indicate any best practice to address challenges related to government or privately financed one-sided media reporting while respecting freedom of speech and media pluralism.

C. Journalists and new media players

16. What is the impact of media convergence and changing financing patterns on quality journalism?

The global and European financial crises of recent years, coupled with already existing challenges to journalism financing models, including the rise of free content not matched by online advertising income amid a massive decrease in traditional advertising, constitute a threat to the continued financial sustainability of many quality journalism outlets. From the New York Times, to the Washington Post and the Guardian, financial struggles are the new norm. Financial crises also threaten the quality journalism viability of Europe's public broadcasters, with implications for democracy and social cohesion on the continent (Sarikakis, 2015). New models of quality journalism are appearing, including through crowdfunding and philanthropic donations and grants, but in most if not all cases their reach is more limited than that of the traditional now-struggling media outlets. One of the outcomes of a rapidly changing media environment is a convergence of public relations and journalism, with branded content masquerading as journalism, and leading advertisers determining content and content slant. Media convergence affects not just the jobs of journalists but also the various elements of the business environment of journalism (ed. Nienstedt HW, Russmohl S, Wizcek B, 2013) from deals with advertisers to funding models, to agreements with social media platform giants like Facebook - which has become the main source of news for young people (HoldTheFrontPage, 2016). This means that private mega-companies like Facebook are increasingly influential in the distribution of news content which means there is a risk traditional business models of quality news outlets can be further undermined. In essence news is increasingly being consumed through third-party platforms. That in turn makes it much more difficult for a quality journalism brand to establish a bond with discerning consumers.

In June 2016 Facebook announced that it would be giving more importance in its algorithms for 'news' feeds, to information from friends and family (New York Times, 2016) meaning that news stories from quality news outlets will show up less prominently in the flow of information that constitutes the Facebook news feed, further undermining efforts by quality media outlets to retain and promote consumer bonds in the age of media convergence.

Further references:

Sarikakis, K. (2015) Public service media in Europe

http://mediagovernance.univie.ac.at/fileadmin/user_upload/p_mediagovernance_industriesresearchgroup/Papers/Public_service_media_in_Europe.pdf

Ed. Nienstedt HW, Russmohl S, Wizcek B (2013) Journalism and Media Convergence

<https://books.google.at/books?id=WQHbCd9qddUC&pg=PA1&lpg=PA1&dq=%22media+convergence%22+%22quality+journalism%22&source=bl&ots=Nz3vn9Snf4&sig=wWY73bABqIG3y26XZ8qt1unXGcE&hl=en&sa=X&ved=0ahUKEwiiolvb9nM3NAhUELMAKHV8BNwQ6AEIKTAC#v=onepage&q=%22media%20convergence%22%20%22quality%20journalism%22&f=false>

Holdthefrontpage (2016) Facebook now main source of news for young people.

<http://www.holdthefrontpage.co.uk/2016/news/facebook-now-main-source-of-news-for-young-people-reuters/>

New York Times (2016) Facebook to change news feed to focus on friends and family.

http://www.nytimes.com/2016/06/30/technology/facebook-to-change-news-feed-to-focus-on-friends-and-family.html?_r=0

17. Have you ever experienced, or are you aware of, any limitation imposed on journalistic activities by state measures?

- Yes
- No

If yes, please give specific examples and further information, including justifications given by authorities and the position taken by journalists.

In 2015 alone, European press freedom slid further according to Freedom House (2015), which for eg noted continued political interference and a lack of transparency at the new Polish public broadcaster. New legislation in Greece makes it even harder for new entrants to enter the media market, which was already characterised by a state unwillingness to issue new licenses. In Hungary, whose free media environment has deteriorated under the government and Viktor Orban, who has enacted legislation that reduces the space for independent journalism, Freedom House noted that big private TV station RTL Klub was disproportionately affected by an advertising tax. In the UK, the chilling climate for national security journalism and reporting on sensitive topics continues following the heavy-handed response by listening agency GCHQ to reporting by the Guardian in particular on the Snowden revelations, including overseeing the smashing up of Guardian computer hard drives in the newspaper building basement. Research by the University of Vienna's Media Governance & Industries Lab, headed by Prof. Katharine Sarikakis, indicates that the chilling effect, spurred through tactics such as deliberate harassment of investigative journalists from the US, UK and Italy reporting on Snowden, during travel through airports, as well as other measures such as open-ended 'investigations' by police of Snowden reporters (in Britain), is being deepened. The research also indicates that the increased use of surveillance by the authorities amid rapidly advancing technological capacities - especially the gathering of metadata - is having a significant impact on the ability of watchdog journalists to play their democratic role in holding public actors to account, because whistle-blowers are increasingly concerned that no matter what precautions they take they can be identified through a variety of surveillance techniques. The lifeblood of journalists, confidential sources, is in danger of being cut off.

In Britain, the advancement of the Investigatory Powers Bill on surveillance through the House of Commons and on to the House of Lords after less than satisfactory adjustments following massive criticism by three parliamentary commissions and a lot of politicians and human rights groups, not to mention journalists themselves, has added to these concerns. Among other things the bill would force Internet providers to store Internet data from their customers showing which websites they had visited for a year. In other EU countries surveillance laws that have been passed (eg. Poland) or are on the cards, are cementing widespread fears that the space for journalism is being narrowed. Other laws are also having a chilling effect. IN Spain a law forbidding the filming of police in the course of their job may mean journalists can no longer report fully on demonstrations or any police action

that they have a fundamental right to document in order to hold public entities to account. There have also been documented cases in Britain Ireland and elsewhere of police illegally or surreptitiously accessing journalists' communications records to identify sources or combat crime in an ends justifies the means approach.

Journalists have sought to counter these moves by a) becoming more familiar and expert with the digital technology that allows them to encrypt communication and b) combining forces with civil society to try to where possible get governments to include in surveillance laws safeguards for journalists and sources.

Further reference:

Freedom House (2015) Freedom of the press 2015.

<https://freedomhouse.org/sites/default/files/FOTP%202015%20Full%20Report.pdf>

18. Please indicate any best practice that reconciles security concerns, media freedom and free speech in a way acceptable in a democratic society.

We are not aware of any best practices in the current security climate in western democracies. Following September 11, and especially in the wake of the Snowden revelations are recent terrorist attacks in San Bernardino, Brussels and Paris, the pendulum continues in virtually all western democracies to swing in the direction of security at the expense of freedom of expression and free journalism, particularly through the passing of surveillance linked legislation and the capacity of security services to use such surveillance which is ever more technologically advanced. The justification is based on the false dichotomy that 'freedom' and 'security' are mutually exclusive and that a bit more security means a bit less freedom - and the notion that this is acceptable in a democracy. It is not. There can be no security without freedom. Any move towards a state of best practice would have to envision the bringing in to line of a state's anti-terrorism laws with the principles of full respect for media freedom and freedom of expression including safeguards for confidential sources, and the principle of proportionality (the laws should be proportionate to the threat). They should also include robust independent oversight mechanisms (not in the form of rubber stamping judges or secret courts that consider requests for secretly accessing individuals' communications records)

19. Have you experienced, or are you aware of, limitations related to privacy and data protection imposed on journalistic activities?

- Yes
 No

If yes, please give specific examples and further information.

20. Have you experienced, or are you aware of, problems linked to hate speech and threats directed towards individuals exercising journalistic activities?

a) Personally known case of Shreedeeep Rayamajhi an online journalist from Nepal, after his reports on political matters to international media he experienced threats, online hate speech and was brutally physically attacked in 2010. He didn't receive any support from the police and had waited for one month to get his case registered (CPJ intervened in his case)

b) A study of Guardian forum comments finds out that 2% of the comments qualify as hate speech and got blocked. Moreover comments posted to articles written by female authors contain more hateful statements than the articles written by men. The 10 regular writers who got the most abuse comments were eight women (four white and four non-white) and two black men, although the majority of Guardian's regular opinion writers are white men.
<https://www.theguardian.com/technology/2016/apr/12/the-dark-side-of-guardian-comments>

c) A case from Croatia : on 19th January in the Croatian capital city's local TV the anchor of TV show, Marko Jurić, had incited to hatred when he, in his message aired at the very end of the show "Markov trg", warned the citizens of Zagreb not to walk near the Serbian Orthodox Cathedral of the Transfiguration of the Lord, because "their children could become victims of Četnik slaughter". In reaction to that the Croatian regulator temporarily suspended the license of the Zagreb-based local television channel Z1 televizija d.o.o. (
http://www.epra.org/news_items/incitement-to-hatred-croatian-aem-temporarily-suspends-local-tv-licence)

21. Are you aware of cases where fear of hate speech or threats, as described above, has led to a reluctance to report on certain issues or has had a generally chilling effect on the exercise of freedom of speech?

- Yes
 No

If yes, please give specific examples and further information.

Journalists around the world are threatened in a variety of ways by both state and non-state actors using various forms of threat rhetoric and hate speech. However, since States have a special responsibility under international law to protect the safety of journalists it is particularly egregious when heads of State are the ones issuing the threats - which result in self-censorship on the part of journalists. When heads of state or governments use bullying aggressive intimidators publicly when referring to journalists they promote a climate in which violence against journalists is likely to follow, and in which journalists self-censor (Reporters without Borders 2016). This behaviour occurs across the world. In Latin America the presidents of Ecuador, Venezuela and Honduras regularly excoriate journalists during their lengthy speeches. Venezuelan President Nicolas Maduro regularly accuses CNN en Espanol and the Miami Herald of being part of an international campaign directed at Venezuela. President Correa of Ecuador has lashed out at journalists by name, and

President Hernandez of Honduras has accused journalists of being “pseudo-journalists” dangerously casting doubt on the legitimacy of their media status.

The same thing happens in Central and Eastern Europe. In Turkey, President Erdogan regularly attacks both local and international media, referring to them as agents, spies and terrorists.

“When I look at you, I understand why you are always negative. Nothing positive can come from you, anyway (...) The fact that you raise these subjects is not surprising. You come from a newspaper of a certain kind and, obviously, from an ethnic background of that certain too. You do it on purpose.” (Reporters without Borders)

This was the response from President Milorad Dodik of the Republika Srpska, the Serbian part of Bosnia and Herzegovina, when Gordana Katana of the independent daily Oslobođenje asked a question during a news conference on 14 March 2015 about a relative of his who had been given a prison sentence. He subsequently ordered government departments to cancel subscriptions with the paper. When a female journalist with the TV programme 60 Minutes asked him a question, he replied: “You work for 60 Minutes? It’s a really lousy programme, it’s complete crap (...) I see that you at least are presentable. But you’re not pretty.” (Reporters without Borders)

Hungary’s deputy prime minister has described investigative journalists as “traitors” working for a “foreign power.” (Reporters without Borders)

In Africa the picture is similar. Gambian President Yahya Jammeh said in 2011: “The journalists are less than 1 percent of the population, and if anybody expects me to allow less than 1 percent of the population to destroy 99 percent of the population, you are in the wrong place.” (Reporters without Borders)

And in Asia too. Thailand’s prime minister, Gen. Prayut Chan-o-cha was asked at a news conference on 25 March 2015 how the government would react if journalists did not stick to the official line. “We’ll probably just execute them,” he responded. (Reporters without Borders)

In Burma, despite moves towards greater liberalism, President Thein Sein said in 2014: “If media freedom threatens national security instead of helping the nation, I want to warn all that we will take effective action under existing laws.” Seven journalists have been imprisoned in Burma since the start of 2014. And in the Philippines recently-elected hardline President Duterte has suggested that certain journalists deserve to be killed.

In the Middle East, from Iran to Egypt government and state representatives consistently refer to critical journalists as terrorists and spies.

Further reference:

Reporters without Borders (2016) Leaders who publicly threaten journalists.
<https://rsf.org/en/news/leaders-who-publicly-threaten-journalists>

22. Have you experienced, or are you aware of, problems concerning journalists' safety and security in the EU?

- Yes
- No

If yes, please give specific examples.

A media threat mapping project by Index on Censorship from 2014 shows just how widespread attacks on, and intimidation of, journalists are in the European Union. From Finland and Malta, to Ireland Croatia and Italy, journalists are attacked and intimidated, with online harassment and physical attacks growing. The mapping of threats - now underway for two years - shows that the number of incidents is rising. Italy is the leader among EU countries for the highest number of physical attacks on journalists. In the first quarter of 2016 there has been a rise in the antagonism faced by journalists covering far right demonstrations, notably in Latvia, Germany, Greece and the Netherlands. The platform also shows that more and more journalists in the EU are finding themselves unable to do their jobs freely because of legislation being passed as a response to the terrorist attacks in Paris and Brussels. It's also notable that journalists repeatedly came under political and police pressure to reveal sources especially on stories related to corruption. In Spain for eg a politician repeatedly pressured a journalist to reveal a corruption story source - despite the fact that journalists' have a right to protect the identity of sources when reporting on stories in the public interest. 2016 has so far shown a rise in intimidation in general. In the first quarter of 2016, in Italy alone there were 27 verified incidents of intimidation directed at journalists from crime syndicates, politicians and football supporter groups. In the first quarter of 2016 there were 7 instances in Germany where journalists were prevented from reporting on an event, 9 in Poland, 20 in France, 10 in Hungary, 9 in Croatia, 44 in Italy, 7 in Greece and 6 in Spain.

Further reference:

Index on Censorship (2014) Under attack: Violence and intimidation stalk journalists in Europe, Index map shows <https://www.indexoncensorship.org/attack-map-shows-widespread-threats-media-freedom-europe/>

23. Please indicate any best practice for protecting journalists from threats against their safety and security.

24. Have you ever experienced or are you aware of pressures put by State measures on journalistic sources (including where these sources are whistleblowers)?

- Yes
- No

If yes, please give specific examples.

Research carried out by the University of Vienna Media Governance & Industries Lab headed by Prof. Katharine Sarikakis, involving interviews with dozens of investigative and national security journalists, shows strongly that new surveillance legislation in Western democracies, and indeed elsewhere, coupled with rapid advances in surveillance technology and an overzealous willingness of the authorities to use it both legally and illicitly is having a direct chilling impact on confidential sources including whistleblowers. Journalists interviewed said they believed such legislation and capacities to be a fundamental threat to watchdog journalism because confidential sources are increasingly scared of speaking to them.

In the UK, after The Guardian newspaper reported on the Snowden surveillance revelations, it was forced to smash up computer hard drives on which Snowden material had ostensibly been stored - even though copies of the material existed elsewhere - under the watchful eye of two GCHQ spy agency officers (1). In the UK again, journalists who have reported on environmental activists opposed to fracking have been informed that they are under investigation but in a Kafkaesque paranoia-inducing twist are told nothing about the investigation (2). In some instances, they have subsequently managed to find out that they have been under close secret surveillance. Also in the UK, in 2015, the Metropolitan Police allegedly abused anti-terror legislation to spy on journalists' phones, to identify a confidential source (3). This was after a year earlier it emerged that the police had routinely been spying on UK reporters who covered protests, for years (4). And Snowden documents released in 2015 indicated that journalists' emails from the BBC, Reuters, The Guardian, The New York Times, Le Monde, The Sun, NBC and the Washington Post had been swept up by British spying agency GCHQ (5). In the US, in 2013, it emerged that the government, going after a leak, had secretly seized switchboard records for phones used by over 100 reporters for the US Associated Press news agency in Washington DC and elsewhere (6). Just weeks later came reports that the government had also secretly seized the phone and email records for Fox News chief Washington correspondent James Rosen, in an effort to obtain information about his interaction with a source they believed had violated the Espionage Act (7).

(1)

<http://www.theguardian.com/world/2013/aug/20/nsa-snowden-files-drives-destroyed-london>

(2)

<http://www.lrb.co.uk/blog/2015/03/24/oscar-webb/am-i-on-the-domestic-extremist-database/>

(3)

<http://www.dailymail.co.uk/news/article-3170190/Met-used-terror-law-spy-reporters-phones-Plebgate-scandal-Three-journalists-launch-legal-action-claims-human-rights-violated.html>

(4)

<http://www.dailymail.co.uk/wires/ap/article-2843470/UK-police-spied-reporters-years-docs-show.html>

(5)

<http://www.theguardian.com/uk-news/2015/jan/19/gchq-intercepted-emails-journalists-ny-times-bbc-guardian-le-monde-reuters-nbc-washington-post>

(6)

<https://cpj.org/reports/2013/10/obama-and-the-press-us-leaks-surveillance-post-911.php>

(7)

<https://cpj.org/reports/2013/10/obama-and-the-press-us-leaks-surveillance-post-911.php>

25. How would pressures on journalistic sources be best addressed?

Such pressure would be best addressed by enacting whistleblower legislation that explicitly protects whistleblowers under the law. One of the fears they have in addition to the primary one of being identified through surveillance is the lack of protection afforded them under the law if they are indeed identified. Another important aspect is to ensure that surveillance legislation does not grant state security bodies powers that violate any number of basic human rights including the right to privacy, and ensuring that such legislation is proportionate to the threat faced, and that its implementation and use is overseen by a truly independent authority, and that review is transparent and accountable.

26. Please indicate any best practice for protecting the confidentiality of journalistic sources/whistleblowers.

Best practice in terms of protecting the identity of confidential sources and whistleblowers comes almost entirely from the side of the journalistic domain, in the absence of proper protection by states, and in the presence of highly advanced data gathering and surveillance capacities used by States to identify such sources. In major and many smaller journalism outlets the protection of confidential sources has always been paramount. That sense of responsibility has been transposed into the surveillance age which means that journalists religiously take steps to protect their communication with sources to limit likelihood they can be identified. This includes the use of encrypted email and chat apps, as well as offline meets in secure locations etc.

27. Have you experienced, or are you aware of, censorship (including self-censorship) in the EU?

- Yes
- No

If yes, please give specific examples.

A recent event organised by the European Federation of Journalists suggests there is more and more fear of self-censorship by journalists inside the EU ranging from topics such as the Panama Papers, to the Cologne assaults on women, to the refugee crisis and the new French surveillance law. On a broader level some have suggested that Google's and Facebook's recent moves (Reuters 2016) to quietly move towards unilateral censorship of what they - without any transparency - regard as 'extremist' content, is tantamount to censorship, as the focus for censorship moves increasingly online. There have also been suggestions that the 'Right to be forgotten' ruling obliging Google to hide content on European servers that applicants say infringes their right to be forgotten also amounts to censorship.

Further reference:

European Federation of Journalists (2016)

<http://europeanjournalists.org/blog/2016/05/02/self-censorship-is-affecting-more-and-more-european-media/>

Reuters (2016)

<http://www.reuters.com/article/us-internet-extremism-video-exclusive-idUSKCN0ZB00M>

28. Have you experienced, or are you aware of, any obstacles to investigative journalism, which may include legal provisions in force or a lack of resources?

AS noted above, the financial challenges of the news profession, relating to the difficulty of identifying viable sustaining business models in an age of media convergence are fudging the line between journalism and branded content, and have resulted in slashed budgets, all of which affects the ability of investigative journalists to do their job. Emerging smaller platforms do good work but are faced with challenges when doing investigative stories on super sensitive national security topics like the Snowden files - for which it is helpful to have the weight of a media powerhouse like the Guardian behind you when you face the threat of arrest under Secrecy, or anti-terror laws. Also as noted above, the biggest current threat to investigative journalism inside the EU comes from the increased efforts to pass surveillance legislation that squeezes the space and willingness of confidential sources - which are the bedrock of watchdog journalism.

29. Do you consider that the level and intensity of investigative journalism, the number of journalists engaged in such activity, the resources available, the space in print and the time available in audiovisual media for the publication of results of investigations has changed over time?

Yes

No

If yes, please give specific examples.

30. Please indicate any best practice facilitating investigative journalism

D. Hate speech online

31. What would be the most efficient ways to tackle the trivialisation of discrimination and violence that arises through the spreading of hatred, racism and xenophobia, in particular online?

Promote diversity, promote research and advocacy regarding discrimination and violence. Not much to be done in situ, such as reports on social media, as this has no long-term effect. Act should be through long-term efficient methods such as education. Also promote publicity of research on the issues. Should always be careful re balance of freedom of expression and regulation.

-Education and sensibilisation of the public; Support for social campaigns like No hate campaign <http://www.nohatespeechmovement.org/>

-Trainings for the police and prosecutors

-Cooperation with and among social media like the newest agreement between Facebook, Twitter, YouTube and Microsoft to review most notifications within 24 hours to tackle racism and xenophobia

Further reference:

<https://www.theguardian.com/technology/2016/may/31/facebook-youtube-twitter-microsoft-eu-hate-speech-code>

32. How can a better informed use of modern media, including new digital media ('media literacy') contribute to promote tolerance? Please indicate any best practice.

Promote diversity, promote publicity of research on tolerance. Introduce and promote online campaigns to raise awareness.

Best practices - the projects of the Evens Foundation

Projects on media literacy to promote harmonious living together, the Evens Foundation aims to stimulate efforts to increase media literacy - by raising critical awareness, which implies comprehension and cultural awareness, and by encouraging media creativity. Both of these contribute to the development of highly aware, active and responsible citizens.

Projects:

1) Media Meets Literacy

Media Meets Literacy is, above all, a series of learning and networking event

taking place in a pleasant atmosphere. It is aimed at Media and Information Literacy (MIL) professionals from all over Europe – from policymakers and researchers to academics and, in particular, practitioners. Organized by the Evens Foundation, it celebrates the foundation's work in the Media and Information Literacy (MIL) field over more than five years. The main objective is to create festive events where the participants can meet, exchange, learn and make plans for future collaboration.

12 best practices

- CAT Cyprus Artefact Treasure in Action
- The Economy of the Media
- Street School
- MEDIASIS: Media Literacy for Teachers
- National Media Coach Training Program
- POLSKA.DOC
- A Journey in a Wondrous World. A Creakids Workshop
- Electric December
- Media Voices 4 Special Teens
- Generations in Dialogue
- The Videomuseums

Detailed descriptions: <https://issuu.com/joadriaens/docs/medialiteracymagazine>

2) Propaganda: "Mind over Media in Europe"

A new, international project by Evens Foundation and 9 partners on analyzing contemporary propaganda. Students and teachers in every country in Europe and all around the world get exposure to many forms of increasingly sophisticated and potentially beneficial and harmful propaganda through their mobiles, tablets and laptops and in public spaces in their neighborhoods and communities. They make wise and well-informed decisions in choosing which propaganda to share with their social networks. In formal and informal contexts, they benefit from opportunities to engage deeply in conversations about contemporary social, political and cultural issues and topics, analyzing the special features of new forms of propaganda, including memes, viral media, and content marketing that we now experience through online social networks.

3) Ersilia – e-tool for visual literacy

Together with LE BAL (an independent venue in Paris, dedicated to the document-image in all its forms), the Evens Foundation engaged in joint reflection on methodologies of media and image education and in producing a teacher-training e-tool in image literacy.

LE BAL has extensive experience in media and image education. Thousands of students from schools all over France have participated in the workshops of La Fabrique du Regard, the educational leg of LE BAL. The goal of these workshops is to develop a critical approach in young people so that they question the conditions in which images are produced, circulated and assimilated.

4) Media Coach training

Training produces 75 new MediaCoaches. The Belgian MediaCoach program, both in Flanders, French community and Brussels.

The MediaCoach program in Belgium focuses on preparing professionals – including teachers, youth workers and librarians who work with young people –

to integrate media literacy into their work practices. The 10-day training provides participants with a theoretical framework on different media literacy topics (media identity and privacy, media production, media and relations, etc). It also focuses on concrete media literacy activities.

5) PolskaLAB

This project is a follow-up of the successful WawaLAB, and PragaLAB, the Evens Foundation and projects implemented in 2013 - 2015. With all good practices shared and lessons learned, PolskaLAB broadens its scope to all over Poland (focus on medium-sized towns).

This project, implemented together with the Association of Creative Initiatives e, provides educational activities for young people that would combine social issues and the new media in interdisciplinary work. Our aim is to build a community around the designed ideas and to make use of them in the activities of other organizations, bring the project beyond Warsaw and to offer it to "medium-sized cities" and share our method with other practitioners of media education in Europe.

E. Role of free and pluralistic media in a democratic society

33. How do developments in media freedom and pluralism impact democracy? Please explain.

34. Who do you think is the most suited to help increase media literacy? Please rank and explain why.

	The most important - 1	2	3	4	5	6	7	The least important - 8
Family	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Friends	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
School	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Media, including online providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dedicated learning systems using e.g. radio, TV, mobile phones and the internet (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Civil society	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other - please specify

35. Please give specific good examples or best practices for increasing media literacy.

Digital cultural environment is now a reality in the domain of culture and can be experienced in all art forms but also in cultural heritage settings such as museums and galleries. Media literacy contributes to a better understanding and appreciation of culture, for example when accessing digital collections, but also greatly to audience development and is therefore becoming paramount for the existence of cultural organisations. It should not only be a case for audiences, but for organisations themselves. Media literacy in the domain of culture could have the form of platforms for sharing skills and know-how for organisations, digital platforms, work of education programmes and should aim at interaction with the organisation and the cultural content, not only experience. An example that contributed to increasing media literacy in the domain of culture with projects and research is Digital R&D Fund for the Arts, a 7 million pounds programme that supported digital technologies and the arts.

Further reference:

www.artsdigitalrnd.org.uk

36. What would be concrete ways for free and pluralistic media to enhance good governance and transparency and thus foster citizens' democratic engagement (e.g. self-organisation for political purposes, participation in unions, NGOs, political parties, participation in elections)?

Pluralistic and free media contribute to good governance, transparency and citizens' democratic engagement. An independent and robust media landscape fosters citizens' participation, creates the conditions for an inclusive society and contributes to the formation of a public sphere in which a diversity of view is represented. In times of crisis, media need to focus on the revitalisation of the public sphere. This could be done by:

Adopting a systems theoretical approach that focuses on wholeness and inter-connectedness and building communicative spaces in which:

- critical views are expressed,
- deliberation and participation takes place,
- strong relationships of cooperation, social collaboration are built (under the system theoretical principle unity-through-diversity),
- shared experiences are transformed into knowledge (spaces for learning),
- a new narrative on the 'commons' is reinforced,
- a dialectic relationship between citizens and authorities emerges (robust linkages between political organisations and social actors),
- self-organisation of citizens for political purposes is promoted,
- co-production and co-design is adopted, in order to bring alternative, sustainable solutions to society.

These spaces could serve as the infrastructure for a democratic society.

37. What are best practices of free and pluralistic media contributing to foster an informed political debate on issues that are important for democratic societies (e.g. in terms of the nature of the content or in terms of format or platforms proposed)?

38. Which measures would you consider useful to improve access to political information across borders? Please indicate any best practice.

39. Do you consider that social media/platforms, as increasingly used by candidates, political parties and citizens in electoral campaigns play a positive role in encouraging democratic engagement?

- Yes
- No

If yes, please give specific aspects and best practices that you would recommend.

If no, please give specific aspects and examples of negative impacts, and possible alternatives to address them.

Not necessarily. Although social media/platforms bring politicians closer to citizens and increase political participation and democratic processes, they are accused for promoting hate speech and misleading information. In particular, they encourage populism and hatred which affects negatively the lives of the people. Additionally, social media/platforms are restricted to citizens who either are already active in politics or have access to the Internet. In order to encourage citizens' engagement, candidates, political parties and citizens should develop better internet platforms in which people could find the truth that is missing in mainstream media. These platforms should provide them with understandings, methods and solutions that are directly interrelated with the topic under discussion. They should also use neutral and simple language in order to attract the general public.

40. Do you consider that there are specific risks or problems regarding the role of platforms and social media — in relation to pluralism of the journalistic press or more generally — as regards the quality of the democratic debate and the level of engagement?

- Yes
- No

If yes, please give specific examples and best practices that you would recommend to address these risks or problems.

Platforms and social media contribute to the democratic debate and the enhancement of the engagement of the citizens. However, there are risks and problems with reference to the quality of the democratic debate, the reason being that they can be sources of hate speech as well as misinformation of the public. Proposals: regular monitoring from the organisations of the content and posts/ comments on the platform.

Contact

JUST-COLLOQUIUM@ec.europa.eu
