Case Id: 48b42200-b20e-4c51-a52c-fddd26b00b05

Date: 14/07/2016 16:02:15

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.

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 - 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 (NB — your contribution will not be published, but the Commission may use it internally for statistical and analytical purposes).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.

Swedish Television is the public service broadcaster in Sweden for television. See question 1.

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

Jocke Norberg, Swedish Television

	res
•	No
If yes,	please indicate your Register ID-number

If your organisation is not registered, we invite you to register <u>here</u>. 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:

Is your organisation included in the Transparency Register?

a) Wha	t 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?
 - O Under 18
 - 0 18-30
 - 0 31-40
 - 0 41-50
 - 51-60
 - 0 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?

Independent media and ethical journalism are essential safeguards of media freedom and democracy. The respect of this principle is a necessary condition for having accountable and free media services that can in turn foster and support democracy.

The role of the State is essential to create mechanisms of legal certainty, transparency and regulatory support that guarantee the independence of media and media regulatory authorities. With regard to the latter, the vital role of independent media regulatory bodies for the broadcasting sector is also clearly stated in the Council Recommendation Rec(2000)23.

Media self-regulation is also regarded as a tool for media accountability, which is important to ensure a sustainable trust from the audience. There is no one-fits-all model of media self-regulation, and the Nordic public service broadcasters have developed internal editorial principles, code of conducts and guidelines to ensure responsible and high-quality reporting in the daily practice.

Media self-regulation is vital to ensure media independence of public service and it aims at establishing minimum principles on professional ethics, accuracy, protection of privacy and other personal rights, while fully securing editorial freedom and freedom of speech, as well as a diversity of points of view and opinions.

The construction of a modern media environment capable of supporting democracy and good governance requires both media self-regulation and media regulation. Media professionals should regulate themselves and the State should provide appropriate infrastructure, funding of public broadcasters and ensure an independent regulatory environment.

While the opportunities and threats to media freedom and pluralism vary significantly across the EU, all lawmakers have a duty to protect and preserve these principles. Importantly, while the specific mission, structure and funding of national public service broadcasting should remain a matter for national legislators, the EU can uphold media freedom and pluralism harmonised across the EU by keeping a watchful eye on media independence and media ownership.

Today there is a need for a stronger political instruments defending media independence in Europe. Media freedom and pluralism should not only be taken into account whenever relevant in the drafting of new legislation and policies, but it should be also constantly monitored and addressed on a European level. Projects like the Media Pluralism Monitor (MPM) do go in this direction and should be further strengthened.

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

Today, Europe is seeing a trend of increasing political pressure on the media and free speech through the limitations of the independence of media companies.

In countries with strong freedom of the media, public service media often have an outstanding degree of trust, and provides the general public with a broad range of programs. But the trust can quickly deteriorate with state intervention and increased control of the media. The development in many countries is worrying, be it Poland, Hungary and Croatia. Also, in the UK suggestions have been put forward for to have a strengthened role the government in appointing the board members of the BBC. Additionally, governments that try to bring public service media under its control, just as often try to exercise control over commercial media, by regulation and taxation.

Moreover, media regulatory authorities and supervisory bodies have a key role to play in respecting and ensuring the independence of public service broadcasting. The independence of media regulators from political structures at all levels is of utmost importance in preserving media freedom and pluralism and for the functioning of the democratic systems in the EU Member States.

What compete	nces would	media r	egulatory	authorities	need in	order to	ensure a	a sufficient	level o)f
media freedom	and pluralis	sm?								

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

Public service broadcasting organisations play a crucial role in securing media freedom and pluralism in the EU Member States and, by extension, in the construction of well-informed public opinion. Media freedom and pluralism are indispensable preconditions and essential safeguards of well-functioning democracies. Media freedom implies editorial independence, the protection of journalists and unrestricted public access to information sources. Media pluralism means citizen's access to a range of sources, views and opinions and that no single media player has an overwhelming influence over the political agenda and public opinion.

The role of public service broadcasters is clearly outlined in the EU Treaty Protocol on the system of public broadcasting in the Member State, that highlights how national public service broadcasting is "directly related to the democratic, social and cultural needs of each society and the need to preserve media pluralism." They highly contribute to the creation of inclusive and democratic societies thanks to educational programmes, media and digital literacy initiatives, as well as a general representation of all groups in society. In alignment with their remits, public service broadcasters also

offer high quality journalism, backed by unique cross border networks of European and international correspondents. This in turn contributes to a transparent and reliable circulation of information and news, which ultimately strengthens respect for and protects media freedom and pluralism.

The role of public service broadcasters in ensuring media pluralism is also reflected in the EBU Core Values Declaration driven by the principles of universality, pluralism, independence, diversity, and accountability towards the public. These core values underline "the importance of sharing and expressing a plurality of views and ideas" and the existence of a public sphere.

Even though, the digital revolution has hugely benefited the plurality of information sources, a larger number of sources and voices has not necessarily improved the general quality of information, or the accuracy of the same. Furthermore, the increasing power of online gatekeeper needs to be counter-balanced. Large and sometimes vertically integrated platforms operators and internet intermediaries are in a position to quickly establish market power and act as gatekeeper. Public service broadcasters are still the most trusted media and the presence of strong autonomous and independent public service is one factors to counter-balance such concentration. Finally, public service broadcasters are very important to promote diversity also in content. In this context, the diversity of content outputs and program should be seen at least as important as its contribution to the structural media pluralism. Public service broadcasters foster cultural diversity by producing, financing or commissioning a high proportion of domestic and European programmes.

The Swedish public service broadcasters are persistently putting the focus on matters related to independence of media and freedom of the press. This is grounded in our strong tradition of press freedom, but also as representatives of independent and solid companies with high trust within the societies we operate. It is important to continue working for the independence of journalists and media from political and corporate influence, conflicts of interests and other types of pressure. We must remain vigilant and act promptly to defend media freedom and pluralism. This is a challenge for everybody: media professionals, European and national authorities, media companies, and European citizens.

9.	now should public service media be organised so that they can best ensure the public service	
n	nandate?	

The organization of public service broadcasting in the Nordic countries revolves around national laws and internal statutes aiming to ensure that they are independent, universal, pluralistic, diverse, accessible to all representative of their audiences and accountable for the public.

The main legal instrument is the public service remit as defined in the Member States' laws and secondary legal instruments.

To ensure that public service broadcasters effectively makes its contribution to media pluralism, it is important to have in place the right organisational and financial conditions to enable it to fulfil its mission. The governance of public service broadcasting should be guided by a few principles; independence, accountability, transparency and sustainability.

Public service should be organised in the form of independent institutions, entrusted with a public service remit and high level of independence to regulatory authorities. Editorial independence and institutional autonomy are absolutely essential for public service to avoid undue interference by political or economic powers. Without a highest level of independence, public service will not sustain credibility and trust from the general public. Public service can only be successful in fulfilling their role if they are, and are perceived as being, truly independent from the government and from other political and economic powers.

To reduce the risk of undue interference, countries have introduced legal safeguards and supervisory systems which distance public service from political institutions, in particular from the executive and legislative branches, but also from political levels.

Furthermore, to strengthen editorial independence and impartiality, it is of great importance for public service to adopt, implement and publish editorial guidelines or codes of professional ethics. Public service should be accountable to supervisory bodies but also to other stakeholders and to the public at large. In this sense, supervisory bodies act as guarantor of independence of public service and to adequately fulfil such role. In particular, the appointment and dismissal procedure should be transparent and State representatives or politicians must be prevented from gaining a determining influence in the governance of these bodies. In this sense, the supervisory body is a buffer between politics and public service which does not allow political interference and protects the interests of the public ensuring a democratic and pluralistic media landscape.

Openness and transparency, just like independence, are most certainly preconditions for building trust with the audience. Citizens have a legitimate expectation that public service broadcasters organisations are; Transparent and open', in the way they are governed and fulfil their remit, and in the way they interact with audiences and other stakeholders; Responsive and responsible, in the way they integrate audience and stakeholder feedback, and in the way they implement high editorial and production standards.

For PSM, the principle of sustainability refers not only to PSM's ability to fulfil their remit and play a vital role in European democratic societies, but also their ability to adapt and respond to new technological, social and political challenges and to continuously be a driving force for innovation and creativity. It is of vast importance to have an appropriate, independent and stable level of funding. It must be sufficient and long-term to allow PSM to fulfil their remit, ensure continuity and investments in services, introduce new technologies and ensure a high level of journalism.

- 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.

Media freedom implies editorial independence, the protection of journalists and the unrestricted public access to information sources. Media pluralism means that citizens have access to a range of sources, views and opinions and that no single media player has an overwhelming influence over the political agenda. The written press, television, radio, social networks, blogs and other online media are all an integral part of a diverse, pluralistic and rich media environment. Any threat to the independence and availability of these media, whether via governmental interference, the intimidation of journalists, a lack of transparency in ownership structures and concentration, overriding commercial interests, or deliberate attempts to block access to content, upsets the overall state of media freedom and pluralism in any European country. And yet each media sector and each European country faces distinct threats, challenges and opportunities.

Threats to the independence of public service media can therefore undermine also the broader media freedom and pluralism of a democratic society, and examples of such threats include:

Misuse of power and political influence on the governance of public service media; In this case, factors which put independence at risk and which should be avoided include: political interference in the editorial independence; politicisation of appointments; revolving-doors and career paths between PSM organisations and ministries or political parties; media owners or managers affiliated with political parties; or majority of ruling party undermining the safeguards of the national media laws. With regard to the latter, arbitrary changes and negative amendments of media laws without public consultations are causing a great concern.

Moreover, PSM are usually publicly owned, publicly funded - at least in part - and have a not-for-profit purpose. This requires effective safeguards to ensure that State ownership and State funding do not result in overall State control but they respect the independence of PSM.

Lack of independence of media regulatory authorities and supervisory bodies; In certain EU Member States, formally independent regulatory or supervisory bodies are found in situations where they are either not given the chance to fulfil their legal duties or are indirectly subjected to political interests, which is a situation maintained by the method of appointing their members. Moreover, PSM independence is also at risk when the formal institutional framework is bypassed by structural legislative changes (for example, the overturning of decisions taken by supervisory bodies, or the early termination of their mandate).

Concentration of media ownership; The right legislative and organisational conditions to secure media independence and transparent ownership are

essential for ensuring independent PSM. Restrictions on concentration are important in the media sector, not only for economic reasons, but above all as means of guaranteeing a variety of information and freedom of expression. Moreover, diversity of ownership of media outlets is not sufficient per se to ensure media pluralism of media content. The way media content is produced also has an impact on the overall level of plurality in the media. Lack of stable funding or other resources; The failure of the State to ensure adequate, stable and sustainable funding of PSM puts severe pressure on media independence of PSM. Sustainable financial conditions and predictable funding backed by clear, appropriate legal frameworks that are effectively applied are necessary to protect the editorial independence of PSM from political influence and/or economic interests. Therefore, although the institutional autonomy of PSM organisations faces limitations in terms of remit and funding, as they cannot themselves define their remit or determine their public funding, it is nevertheless essential to protect a high level of programme autonomy and financial or budgetary flexibility. Finally, adequate funding brings in turn sustained investments in quality programmes and such investment is a key driver for technological innovation and the development of new services. Audiences will only access and engage with the various platforms/devices if the stream of creative and high-quality audiovisual works is sustained. Therefore, supporting the investment streams for original European content should be a key part of any future public media policy and it will foster a pluralistic media landscape that reflects the European cultural diversity.

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? Ves No
If yes, please give specific examples.
12. Please indicate any best practice on how to ensure an appropriate level of transparency and plurality of ownership in this area.
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.

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 revenues from advertisement goes from local newspapers to global giants like Google and Facebook who have different intentions or responsibilities to support or create local news. The result in Swedwn are increasing problems for the local newspapers. With closures of local newspapers and / or redundancy of journalists, the possibilities for quality journalism and pluralism are decreasing. More and more cities and regions will no longer have local newspaper to investigate the political and economic power in their region.
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.
18. Please indicate any best practice that reconciles security concerns, media freedom and free speech in a way acceptable in a democratic society.

mposed (on journalistic activities?
Yes	
No	
- 110	
es, plea	se give specific examples and further information.
Have yo	ou experienced, or are you aware of, problems linked to hate speech and threats directed
wards ir	ndividuals exercising journalistic activities?
_	we witness a negative development with more abuse and attacks on
	alists, resulting in less freedom for the press. For example,
	censorship among journalists increases by day - a direct consequence of
	harp rise in threats and hate propaganda. Today's digital environment ha
	an increase in journalists being exposed and vulnerable in new ways. A
	t report from the organisation Security and Cooperation in Europe (OSCE
	that female journalists experience roughly three times as many abusive
	nts and direct threats as their male counterparts online.
You s	ee the same tendency in several Swedish investigations made by the
journ	alist union and publishers organizations. Daily journalists are
	tened or harassed especially through telephone calls, emails and social
media	. It less common that journalists get direct threats through physical
meeti	ngs. However, in general threats have increased, in Sweden as well,
durin	g the last years and they get more brutal. The digitization has given n
oppor	tunities to anonymously threat journalists and possibilities to arrange
hate	campaigns where several thousand persons could take part.
Every	third journalist has been threatened or harassed during the last year,
accor	ding to an investigation made by the Publishers and the Swedish Radio.
(http	://www.utgivarna.se/images/Filer/Utgivarna_Hot_och_hat_juni2016_enkelsi
r.pdf	
It al	so shows that the newspapers got more threats than the public service
broad	caster. According to this
inves	tigation you can see that women are subject to heavier threats,
espec	ially of sexually violence. As well, the investigation shows that it is
manly	men behind threats both against women and other men. The situation is
almos	t unbearable for some of the journalists, mainly women, that feels
insec	ure and one out of three women that have been threatened consider to
leave	the profession. There is an obvious risk for self-censorship to avoid
subje	cts that you know could cause server reactions such as issues related t

migration. However, it is difficult to identify concrete cases where

affect the way a story is told than giving it up.

journalists due to the risk of being bullied has decided to not carry out covering a story. It is unfortunately more delicate; the threats could rather

19. Have you experienced, or are you aware of, limitations related to privacy and data protection

2	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?

(0)	Voc
	res

O No

If yes, please give specific examples and further information.

The Finnish investigative journalist Jessikka Aro has been the subject of hate speech and propaganda campaigns over the last year after investigating a story related to the "Internet trolls", Russian propaganda factories. Pro-Russian activists insist that they are merely exercising their right to free speech, and that they do not take money or instructions from Moscow. The most abusive messages against Ms. Aro were mostly sent anonymously or from accounts set up under fake names on Facebook and other social media.

The hate speech campaign against Jessikka Aro was one of the reasons leading to public statement by 22 Finnish publishers against non-serious, discriminatory and xenophobic non-professional media outlets.

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.

It is important to raise the awareness of the problems with increasing threats in society. This is a responsibility both for politicians and civil society, as well as the media industry itself. Threats against journalist are not only threats against individuals and professionals, it is an action against freedom of speech and basic democratic rights to inform and be informed. However, this is not enough. The legal protection is generally weak. By strengthening the legislation, a clear signal will be given to society that the current development is not acceptable and it will give authorities both the incentive to act and the legal tools to do so. See also q. 20

security.
The European Broadcasting Union, including the Nordic public service broadcasting companies, and Swedish Television supporting the Reporters Without Borders (RSF) campaign to create a Special Representative to the United Nations Secretary General dedicated to the safety of journalists. An attack on journalists is an attack on people's fundamental freedoms and rights of access to information, a key sustainable development goal for the UN.
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 I yes, please give specific examples.
Swedish Teklevision have, on a few occasions, received requests from the police to reveal sources of stories related to ongoing criminal investigations. However, legal procedures have given the companies the right not to reveal the sources. Whistle-blower's in all public companies are today protected by a special law in the Swedish legislation.
25. How would pressures on journalistic sources be best addressed?
Only by legislation that really protect the journalistic sources.
26. Please indicate any best practice for protecting the confidentiality of journalistic sources/whistleblowers.
27. Have you experienced, or are you aware of, censorship (including self-censorship) in the EU? Ves No
f yes, please give specific examples.

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?

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See question 30.
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- 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.

See question 16.

30. Please indicate any best practice facilitating investigative journalism

The story around LuxLeaks was published in November 2014 and revealed major financial scandals within the EU in relation to tax evasion. With information originating from whistle-blowers, an international network of journalists, including Swedish Television and Swedish Radio, participated in the review of the information, which showed the extensive involvement of European companies. The reporting triggered worldwide public outrage over of tax policies and it has led to concrete reforms, most notably within the European Union. This demonstrates the importance and digital possibilities for journalists to work cross-border with access to local knowledge and international networks like the International Consortium of investigative journalists. The story of the Panama papers has being developed in a similar way. But, the international cooperation among journalists today have further underlined the cross-border aspect of journalism and the fact that press freedom and freedom of expression are fundamental rights in one country and reasons for prosecution in another. In April 2016, the two whistle-blowers and one of the journalists behind the story were brought to justice in Luxembourg. Today it should be unthinkable that a European country decides to prosecute a journalist for something that is recognized as reporting in the interest of the public. It shows a lack of respect for the important role of journalism and an affront to press freedom. The process also shows that we cannot take the media's investigative mission for granted in Europe. Europe needs at least a minimum level of protection for journalism in all countries, as well as extensive protection for sources that makes investigative journalism possible.

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?

When online hate is spreading in society, there are negative consequences for democracy. Opening up the production processes and involve citizens in different stages, in parallel with the use of new skills, capabilities and technologies, can combat hatred online. Experience shows that a dialogue with the public about the editorial research, angles and analyzes provide more tips and news, higher quality content, increased confidence through transparency and a friendlier tone in the conversation.

As a consequence of the worrying development of new forms of hate and threats through the Internet the Swedish government has conducted a review of the protection of individuals' privacy. According to the directives of the investigation, it is important for the community to highlight the crimes that occur on the Internet is just as serious as those committed by analogy. When people increasingly choose to take part mainly of information that confirms their own view the knowledge gaps widen. This could lead to polarization of views and perceptions of reality. The antidote is credible, independent and involved media. A media landscape in balance and a sustainable media landscape is the guarantor of a healthy democracy.

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.

See question 31.

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

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

Limitations to media freedom does not only jeopardize free and independent news coverage, but also limits the democracy at large. Limitations can take many expressions.

First, today have a situation where the role of journalists is put under hard pressure, where journalists have become a target for hatred, violence, kidnapping and arrests. Last year, 111 journalists were killed, according to figures from the International News Safety Institute (INSI). The majority of them were local journalists.

In all too many instances the governments of the world do not protect journalism, they are the very reason behind the abuse.

Academic researchers have published reports of how media pluralism is essential for a democratic society. For example, Ken Newton, a professor in social science at the University in Southampton, conclude:

"It shows that the populations of countries with public service broad— and narrowcasting are better informed about government and politics, are more trusting of other people, have more positive civic attitudes, have greater confidence in democratic institutions and are more likely to engage in democratic politics. Moreover, levels of social trust are higher in countries which have a significant public service element in their media systems, even among individuals who do not habitually watch public TV channels."

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

	The most important -	2	3	4	5	6	7	The least important - 8
Family	0	0	•	0	©	0	0	0
Friends	0	•	0	0	©	0	0	0
School	0	0	•	0	©	0	0	0
Public authorities	0	0	0	0	•	0	0	0
Media, including online providers	0	•	0	0	0	0	0	0
Dedicated learning systems using e.g. radio, TV, mobile phones and the internet (please specify)	©	•	0	0	0	0	0	•
Civil society	0	•	0	0	0	0	0	0
Other (please specify)	0	•	0	0	0	0	0	0

Other - please specify

As a citizen, to fully participate in a democratic society, it implies not only the access to relevant media, it also requires understanding, motivation, a critical approach as well as possibility to interact with and influence media. Media and Information Literacy skills among both citizens and media producers is to be of greatest importance for the democratic development. Public Service has here a crucial role to play.

Public service companies have responsibilities, in not only offering trustworthy media but also to make available a wide range of programs for both adults and younger audiences that provides not only entertainment but also information and education. In a diversified society this is perhaps more important than ever, as digitalization create information overload as well as information gaps and disorientation.

The Swedish Television have over decades had high levels of trust among citizens for its content. The challenge ahead is to gain young people's trust and to be relevant to all who need help to evaluate and filter information. Through relevance and diversity, in production phase as well as in a quality program content, public service is the most suitable partner to help the younger audience to develop critical thinking, understanding, finding and use of media. A Media and Information literate population should have, and requires, access to trustworthy media.

To meet the needs of audiences today and tomorrow requires interaction. Media and Information Literacy is a shared responsibility between producers and consumers. In competition with social media as distributor of moving images the public service has ability and skills to create real engagement and interaction with the audience.

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

The Swedish Educational Broadcasting public service company (UR) recently developed two specific projects, "Orka plugga" (Smart Studies) and "Pregunta ya!" (Spanish language TV series) in which they tested several methods to include young people in the working process. With the younger audience in focus in the developing phase and in the outcome of these cross-media projects, their needs became the essence of the projects. The "Orka Plugga" aimed to reach young people with content useful in schoolwork. Through working together with the target groups, students and teachers, in an agile process UR produced highly relevant content. One part of the "Orka Plugga" is to explain, exemplify and concretize the knowledge requirements in school, another is to give study skills. An important goal for this project was the engagement with audiences on different platforms, to answer questions and comments to get a deeper understanding of the needs of students and teachers. "Orka Plugga" was launched in spring 2015 and the video clips have successfully been spread virally among teachers. The "Pregunta ya!" (Ask now!) provides language skills through culture. The idea was to make programs relying on interaction with the audience in order to reach a larger, wider and more diverse group of students. Therefore, students all over Sweden was asked to film themselves telling what they would like to know about young people in the Spanish speaking world. The UR received hundreds of filmed sequences with questions from a young perspective and from that designed the content. The television format created out of these questions was, in a way, very simple, and therefore authentic. Within short time and without marketing "Pregunta ya!" became the top program among TV series for the age group 15-17. A few months later young students studying French and German contacted the UR and asked if they could send their cell phone films asking question about young people in the French and German speaking countries as well. This is now an ongoing project. Finally, the example "Makt hos mig" (I got the Power) inspires young people to discuss democratic issues. As in the examples above, the idea was to inspire

Finally, the example "Makt hos mig" (I got the Power) inspires young people to discuss democratic issues. As in the examples above, the idea was to inspire and engage a young audience by making them part of the production. Working together with the target group, young people who will be first-time voters soon, the production managed to engage groups who usually are not seen and heard in media and thus strengthen their identification and participation in a social and political dialogue.

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)?

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.
 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.

A limitation of the open Internet will have direct effects and limit the diversity in the media as we now know it. To support a continued fully open internet is also to support fundamental democratic values. The rights guaranteed offline today should also be guaranteed online, today and in the future.

The underlying operating model of platforms which is addressed in the recent Commission staff document on the functioning of platforms are based on network effects. Once a platform has a market leading position, it would be hard to compete already from a start for new outlets and services. When adding the zero rating scheme, it would be almost impossible. This could lead to a

situation where only services with sufficient resources can negotiate preferential deals, distorting competition, impeding innovation and reducing user choice. This would in turn have important effects further in the value chain and in the end for consumers in terms of media freedom and pluralism. Recently, the Swedish public service broadcasters, together with 26 other Swedish publishers, signed a petition encouraging the Swedish government and parliament to further act to ensure an open Internet. The request is illustrated by a recent cooperation on business models which, in the long run, jeopardises media company's ability to reach the audience, the public. The offer means that Facebooks service together with a few other offers from selected CAPs are offered zero rated. The practice has been questioned by consumers as well as media companies. The agreement between Facebook and Telia leaves other media companies with three negative choices: Either to move into similar agreements with Telia (but without the negotiating power of Facebook), publish the content directly on Facebook, and thus losing the control over how the material is presented to the audience/consumers, or to keep the media services as "normal" internet services, thus delivered at a higher price for consumers.

Free access online is fundamental for media to take full advantage of the great opportunities of the digital world. Its fundamental for the general public in terms of security a biggest possible variety of services and information. It intends securing an open Internet with equal treatment for everyone, a non-discrimination approach online, positively or negatively. All traffic on the Internet is treated equally, no traffic should be prioritised, blocked or corrected. If the Internet becomes a place where only companies like Facebook and Google have priority and set the terms, it will be extremely difficult for national/local media to reach out to the audience. A limitation of the open Internet will have direct effects and limit the diversity in the media as we now know it.

In this context it is important to note that the media also subjected to other actors to reach its audiences. For us, as media companies it is important that we are allowed to make our own judgement on what to publish and how to arrange it. That freedom is increasingly challenged by the increased dependence on Google, Youtube and Facebook, where algorithms can control what information and news individuals actually can access.

To support a continued fully open internet is also to support fundamental values. The rights guaranteed offline today should also be guaranteed online.

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