EUMEPLAT
European Media Platforms:
assessing positive and negative
externalities for European culture

Deliverable 5.7

Short Policy Recommendations Report

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1   Methodological note

Deliverable 5.7 results from the cooperation among all partners, and it is expected to take together the evidence-based recommendations, as they can be inferred from the different research tasks. As several topics are transversal to the Work-package organization (i.e., movie circulation in WP1 and WP3; or social media discourse in WP2 and WP4), we will not follow the WP order, while grouping the recommendations into thematic clusters.

At the methodological level, we have followed a multi-step procedure, based on the participatory approach that has inspired the whole project, starting with the drawing of the semantic map of Europeanness and Europeanization, for WP1.

Firstly, WP leaders and task leaders provided a document about the operationalization of the respective outcomes. A template has been made available by the Coordinator, which is leading this task, albeit such template could not apply to the sections guided by peculiar methodologies – i.e., the regulation task and the Delphi+ workshops. Reports have been provided: for Cluster 1, by Volker Grassmuck and Barbara Thomass (HBI), and by Stylianos Papathanassopoulos (NKUA); for Cluster 2, by Ioanna Archontaki, Iliana Giannouli, Achilleas Karadimitriou and Stylianos Papathanassopoulos (NKUA), and by Volker Grassmuck and Barbara Thomass (HBI); for Cluster 3, by Ioanna Archontaki, Iliana Giannouli, Achilleas Karadimitriou, and Stylianos Papathanassopolous (NKUA), by Daniël Biltereyst (UGent), and by Dessislava Boshnakova (NBU); for Cluster 4, by Cláudia Álvares, Miguel Crespo, José Moreno and Mehmet Ali Üzelgün (ISCTE-IUL), by Nico Carpentier, Vaia Doudaki, and Miloš Hroch (CU), by Jim Ingebretsen Carlson and Francisco Lupiáñez-Villanueva (UOC), by Babette Lagrange and Sofie Van Bauwel (UGent), and by Fabiana Zollo (UniVe).

Secondly, the Coordinator – after a synoptic reading of both deliverables and additional notes, drew a first list of policy recommendations, organized into five thematic areas, subsequently reduced to four, based on the partners' feedback. Then we moved to the proper validation step, with all partners involved in the review, comment and integration of the recommendations, both online on a shared document, and by means of extensive in-presence discussions, which took place during the Lisbon plenary meeting, in November 2023; and during the final WP5 meeting in Prague, in January 2024. After collecting the feedback from the Consortium, the Coordinator individually contacted the authors of the recommendations for the fine tuning and the final adjustments.

An additional taskforce has been necessary in the case of a specific topic – the platformization of Public Service Media and the updating of the Amsterdam Protocol – with the participation of Volker Grassmuck and Barbara Thomass (HBI), Stylianos Papathanassopoulos (NKUA), and Andrea Miconi (IULM). Based on the above remarks and indications, a new version of the recommendation deliverable has been eventually drawn by

the Coordinator and submitted to the approval of the Steering Committee, on mid-February 2024.

The style of the report, in its turn, reflects the variety of authors and approaches from which it results: some sections are more academic than others; in some cases, a direct use of scientific bibliography is made, while in other cases the references point to the EUMEPLAT deliverables. It is our belief, in the end, that such a participatory method – albeit being time consuming, as expected – has proved to be particularly effective for giving voice to the different identities and positions represented in the EUMEPLAT Consortium, and it is our intention to implement a similar strategy in our future projects.

The recommendations have been presented during the EUMEPLAT final event, organized by UNIMED in Brussels on February 27, 2024, in two sessions respectively chaired by Fabiana Zollo (UniVe) and Vaia Doudaki (CU). Dessislava Boshnakova (NBU), Stylianos Papathanassopoulos (NKUA) and Barbara Thomass (HBI) also participated as main speakers. We thank the respondents which joined the event and provided their feedback to our proposals, and namely: Wouter Gekiere (Head of the Brussels Office of the European Broadcasting Union-EBU); Halliki Harro-Loit (Principal Investigator of the MEDIADELCOM Horizon 2020 project); André Lange (independent researcher, and founder of the European Audiovisual Observatory); Vincenzo Le Voci (Secretary-General of the Club of Venice); Virginia Padovese (NewsGuard Managing Editor & Vice President Partnership, Europe and Australia); Juliette Prissard (General Delegate of EUROCINEMA); and Sabina Tsakova (Legal and Policy Officer of the EU DG Connect, Audiovisual and Media Services Policy Unit).

2   Recommendations

Section 1 - An Action Plan on the European Public Sphere

Main authors: Volker Grassmuck, Stylianos Papathanassopoulos, & Barbara Thomass

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Related WP: Work-Package 1 and Work-Package 2

(1.1) Strengthen media pluralism and freedom

Short Recommendation

Media pluralism is fundamental to safeguarding democratic values and media freedom. Concentration processes are inherent to a profit orientated media market due to the reigning economies of scale. These in turn restrict competition, thereby reducing the diversity sources. Furthermore, as stated in the EuroMedia reports, "lack of transparency regarding media ownership and funding is one of the key reasons why public trust in news media organizations has been declining". Our recommendation is based on the following points:

1. Establish a strong, permanent, informative instrument for monitoring concentration of media ownership and opinion power - possibly by taking together, or promoting synergy between the Media Pluralism Monitor (MPM) of the Center for Media Pluralism and Freedom (CMPF) and the Euromedia Ownership Monitor (EurOMo) launched by the EuroMedia Research Group.

2. Strengthen the independent European Board for Media Services' powers to take binding decisions on issues of media pluralism with a European dimension.

3. Encourage the development and deployment of tools throughout the news environment both on media and on social media platforms, that make relevant ownership and risk metrics available to citizens (similar to the information panel on YouTube that "if a channel is owned by a news publisher that is funded by a government, or publicly funded," provides publisher context and a link to the publisher's Wikipedia page.)

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies; Scientific Community

Discussion

The reflection on media concentration implies to start with the fact, that media are a good with dual character: on the one hand they are merit goods, on the other hand they are commodities/economic goods with which profit can be made, just like with any other commodity. Considering them as merit goods – a concept from goods theory that states, merit goods are goods for which private demand falls short of the socially desired level – incorporates analysing the undesirable developments and critical issues that the media market produces. The commercial media business models are oriented towards profit maximisation and only consider the interests of recipients as an instrument for profit maximisation; societal interests do not play any or only an auxiliary role. Rationalisation measures that affect the performance level and the freedom of decisions of the editorial offices are the result, which have serious consequences for societal communication. If it has long been true for the quality press that it no longer fulfils function of satisfying the demand for information and education in a sufficiently profitable way, this has also become apparent for the analogue audiovisual media. The digital communication media are no longer even measured against this claim.

This dual character of media has led political actors to try to regulate media since time immemorial, to pursue overriding societal interests and/or norms. For pluralistic societies, a central norm is the pluralism requirement. The normative reference point for democratic functional requirements of the media is to regard listeners, viewers, readers, and users not only as consumers, i.e., market participants, but at the same time as citizens with a right to cultural participation, observation of political events and participation in the formation of opinion. It is this normative reference point that requires pluralism of media and poses the question how media concentration as a threat to media pluralism evolves and how it can be combated.

Media concentration theory can build on the rich body of literature on capital concentration in general, which states that capital in private hands leads to processes of accumulation and centralisation (e.g. Baran/Sweezy 1967, Bischoff/Boccara/ Zinn et al. 2000, Huffschmid 1969, 2000, Kisker 1999, 2000, Mandel 1972, Sweezy 1970). Even traditional competition theorists sometimes recognise "… the capitalist competition process as a process of selection, displacement and concentration in the context of society as a whole" (Olten 1998: 41). From the point of view of competition theory, this analysis of the competitive process and the restriction of competition is very significant but has remained largely unnoticed.

But even without such a general capital-critical analysis, a look at the economic causes of media concentration leads to a similar result: Private ownership of media, profit orientation, competition as well as the economies of scale inherent in media as economic goods, sooner or later lead to phenomena of concentration in all media markets, even to degrees of

concentration that are diametrically opposed to the ideal of a pluralistic media order. This can be observed in press markets, in the broadcasting market, in the film industry, and currently in the offerings of digital communication platforms. It can be assumed that it will also be the case for all communication-relevant applications of artificial intelligence.

In addition to economic causes of media concentration we can detect political causes: privatisation (of former public ownership of media), deregulation and promotion of concentration (for the sake of strong media companies that should compete with US-American entertainment giants) has led over decades to the high degree of media concentration, that we observe today.

Forms of media concentration are manifold: shares, assets and investments, merger, acquisition/purchase, joint venture, strategic alliance, cooperation – all these sometimes open often opaque operations make it difficult for the regulators on national and even more on supra-national levels to find ways how to curb it. This way, media systems display horizontal integration (few companies dominate products within the same type of business), vertical integration (the whole supply chain is operated by the same or few companies), and diagonal growth (few media firms operate across several media sectors and even beyond media and communication industries) (Mastrini & Becerra, 2008).

The consequences of media concentration extend to the to the whole range of media-related aspects. They affect corporate structure and corporate culture, media production and distribution, media professions and labour market, media products/content, media consumption, media systems, media policy, public sphere/politics/culture, media research. The threats of ownership concentration for the fulfilment of media's democratic role have been discussed widely among scholars from liberal and critical perspectives (see Doyle 2002, Baker 2007). The abundance of sources, which the Internet provides, did not put an end to these concerns, because analyses show, that online communication is characterised by even intensified concentration processes (Hardy, 2014; Hindman, 2018). Large conglomerates are in and get in an even more advanced position, as economies of scale work for them increasingly because of the technological developments: smaller competitors cannot keep up with raising fixed costs and lower marginal costs of cultural production favour the big players (Noam, 2016; Picard, 2010). In consequence, a high and growing degree of ownership concentration is observed by empirical research. Findings point to increasing consolidation of news media all over the world, with additional strength in highly commercialised media systems and sectors (Abernathy, 2018; Saffer et al., 2020).

Drawing on the mentioned theoretical framework and empirical findings, the Media for Democracy Monitor – addressing the topic of the performance of news media within contemporary democratic societies – assumes that ownership concentration in the media may compromise the plurality of the media landscape and undermine their democratic performance.

It was found that most of the 18 countries analysed in the Media for Democracy Monitor 2021 have a medium to high degree of concentration, with only Canada and Portugal with low concentration and more than two competitors for all news media sectors (see Indicators E1

and E2, Media ownership concentration national level and regional/local level on https://euromediagroup.org/mdm/reports/2021/by-indicator/).

If one considers the functional requirements placed on media with respect to democracy but also to markets, media concentration poses enormous problems. This is why almost all media policies have been directed at attempts to curb media concentration – whether ostensibly or seriously – and have ultimately failed time and again. This is true on the local, the national, the EU level and no chance on the global level. Additional problem for democracy with high concentration (Trappel 2021): Media companies are not democratic by nature. Nonetheless, democratic values are of importance to them, as they claim to be the main institutional addressees of freedom of speech rules. In other words, Trappel states, "media companies profit from, and their independence is rooted in this fundamental democratic right to free expression. At the same time, democratic procedures of decision-making are not widespread within media organizations" (ibid).

"From a historical perspective, there is something counterintuitive about the idea of putting reins on the media market. The market once provided the stage on which subversive thoughts could emancipate themselves from state oppression. But the market can only fulfil this function if economic laws do not penetrate the pores of the cultural and political content that is disseminated via the market. This is still the correct core of Adorno's critique of the culture industry. Suspicious observation is called for because no democracy can afford a market failure in this sector" (Habermas in Sueddeutsche Zeitung 19.5.2010,Transl. BT).

This is how the German philosopher Juergen Habermas argued in favour of dealing with the problem of media concentration. And media policy did so on the national level and half-heartedly on the European level. But anti-concentration laws ran for decades behind the real progress of media concentration. Current concepts which are discussed for curbing media concentration are self-regulation, regulated co-regulation and media governance which describe how media ownership should be put at the service of societal goals. They aim at the excesses of media performance because of profit orientation to find that balance between the merit and the commercial good. Excess profits tax or digital tax aim at the redistribution of profits for societal goals. But both do not touch on ownership and concentration.

From the side of the EU Commission, new regulations as General Data Protection Regulation (GDPR), the Digital Markets Act (DMA), Digital Services Act (DSA), and European Media Freedom Act (EMFA) proceed with ownership transparency, but these activities still fail to control ownership concentration, and the democratic backsliding not sufficiently addressed. Consequences of ownership concentration on editorial freedom, content quality, combat corruption still needs to be addressed. In this respect, we can consider transparency as an auxiliary construct to curb the consequences of media concentration: at least, the audience (can) know who owns the media and dominates the discourse. But the task to defend the norm of a pluralistic media market against the ever-ongoing concentration processes remains. There is ample proof of media concentration throughout our project, in particular in the data from WP1 and WP3, not to mention the overarching theme of platforms. This evidence supported

by the current data from the EuroMedia Ownership Monitors and from the Media Pluralism Monitor, as well as by the high fines that the EU regularly imposes on platform companies for abusing their market-dominating positions. Media pluralism is fundamental to safeguarding democratic values and media freedom. Concentration processes are inherent to a profit orientated media market due to the reigning economies of scale. These in turn restrict competition, thereby reducing diversity. Furthermore, as observed by the Euromedia research group, "lack of transparency regarding media ownership and funding is one of the key reasons why public trust in news media organizations has been declining".

We reckon that the EU has encouraged monitoring exercises. The Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute has been developing the Media Pluralism Monitor since 2013, and the MPM 2023 report finds an alarming level of risk to media pluralism in all European countries. The Democracy Action Plan also established the Euromedia Ownership Monitor (EurOMo). The EMRG, which already operates the Media for Democracy Monitor (MDM), has been commissioned with the EurOMo, prepared databases on news media ownership, media laws and platforms as well as country reports and announced a report comparing all EU countries. In this respect, we also place attention on the need of publicly available data, in respect of the principles of transparency, while the EUMEPLAT research tasks have been affected – as detailed already in the first reporting – by the scarce availability of industrial data (see also section 3 of this document).

A coherent EU regulation on the specificities of media concentration has been prevented due to MS insisting on their prerogative on media and to strong lobbying. Only with the European Media Freedom Act (EMFA), the EU is beginning to take first steps to harmonise national rules.

The provisions on assessing media market concentrations in Art. 21 EMFA explicitly go beyond the Union and national competition law assessments of pluralism and take into account the impact of the concentration on the formation of public opinion and on the diversity of media players, also in their cross-media, digital and non-media businesses as well as on editorial independence and the findings of the Commission's annual rule of law report concerning media pluralism and media freedom (e.g. EC 2023).

The proposed intervention should also ensure that, after the pilot phase of EurOMo is evaluated - also in light of the MPM, and possibly merging the two bodies - a permanent, strong, informative instrument for monitoring concentration of media ownership and opinion power is established. To make relevant ownership and risk metrics available also to citizens, tools should be developed to display them throughout the news environment for practical everyday media usage. The Action Plan should also explore the possibility of a media oversight body with actual teeth.

To sum up, our recommendations are based on the following points:

1. Establish a strong, permanent, informative instrument for monitoring concentration of media ownership and opinion power - possibly by taking together, or promoting synergy

between the Media Pluralism Monitor (MPM) of the Center for Media Pluralism and Freedom (CMPF) and the Euromedia Ownership Monitor (EurOMo) launched by the EuroMedia Research Group.

2. Strengthen the independent European Board for Media Services' powers to take binding decisions on issues of media pluralism with a European dimension.

3. Encourage the development and deployment of tools throughout the news environment both on media and on social media platforms, that make relevant ownership and risk metrics available to citizens (similar to the information panel on YouTube that "if a channel is owned by a news publisher that is funded by a government, or publicly funded," provides publisher context and a link to the publisher's Wikipedia page.)

(1.2) Strengthen community media

Short Recommendation

Citizen or community media were recognized as third pillar when the "dual" system of broadcasting was established, in the mid-1980s. They provide media and information literacy training and active participation in media content production, creating cultural and linguistic diversity, social inclusion, and intercultural dialogue.

Their European umbrella organization, the Community Media Forum Europe (cmfe.eu), together with the PSM and the Broadcasting Councils, should be encouraged to establish a Council of the European Public Sphere, as a multi-stakeholder forum where forward-looking plans can be negotiated. Even the idea of a public media service for Europe could be raised, in terms of an EU PSM specifically for cross-border news journalism, democracy-relevant current affairs reporting and debate which would involve civil society and would not take anything away from national PSM. Similarly, a community media service for Europe can be imagined, grounded in a network of existing (and newly-established) community media.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies; Civil Society Organizations; Community Media Organizations; General Public

Discussion

Citizen or community media were recognized as third pillar when the "dual" system of broadcasting was established, back in the mid-1980s. They provide media and information literacy training and active participation in media content production, creating cultural and

linguistic diversity, social inclusion, and intercultural dialogue. Their European umbrella organization, the Community Media Forum Europe, needs to be involved in the proposed Action Plan for a European public sphere. Community media would form the Council of the European Public Sphere as the multi- stakeholder forum where forward-looking plans can be negotiated. Even the idea of a public media service for Europe could be raised in this context, as an EU PSM specifically for cross-border news journalism, democracy-relevant current affairs reporting and debate which would not take anything away from national PSM. Similarly, a community media service for Europe can be imagined, grounded in a network of existing (and newly-established) community media.

Our research has shown the need for supporting diversity in media, which can be done by relying on community media providing the services that only they can provide. In particular, task 2.2 data shows that the discourse on so-called social media is not dominated by common citizens, but by professional actors from media and politics. On the positive side, task 2.4 casts spotlights on Best Practices in Citizen Journalism and found "1) the interest of citizens to collaborate with journalists 2) in the learning and putting into practice of journalism principles and techniques and 3) adding context to journalism, which is always positive for public discussion in democratic societies." For these recommendations to become operational, we could think of strengthening civil society organizations with different societal activities, including "media": e.g., human rights organizations being active on issues like inclusion and migration, and who use media/communication channels – see for instance Amnesty 'doing' communication (for the link between social media literacy and peace education, see also recommendation 4.1). In this respect, we finally recognize that a more operational definition of civil society organizations is necessary – and a restrictive one, either in terms of number of involved citizens, geographical scope, or kind of social mission - even though it could not be part of our research tasks.

(1.3) Establish a European Journalism Fund

Short Recommendation

The institutions should evaluate the past and current measures to support the news, by means of a multi-stakeholder process identifying those areas of European journalism infrastructure which are crucial for democracy, but not able to be delivered by the market; and therefore, bundle the measures into a permanent fund for a European journalism. When compared to the existing initiatives, we put forward that a *permanent* fund should be established, in place of the running temporary programs.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies; Media Industry; General Public; European Union's, Members States' and Turkish Media Authorities

Discussion

Whether the EU has competence in regulating and funding media pluralism beyond ensuring the functioning of the internal market is under ongoing debate (e.g. IPOL 2023: 17 ff.). In its opinion on the European Media Freedom Act (EMFA), the Council's Legal Service (2023) confirmed that the media, as players in the EU's internal market, are indeed subject to EU legislative competence. It has been argued that the fundamental rights of media freedom and pluralism do not only have a defensive dimension, while implying the obligation to "make every effort to ensure that the conditions for the effective exercise of fundamental rights are met. These preconditions of freedom include not least the pluralism of the media" (Cole, Ukrow & Etteldorf 2021: 36).

This can be seen as an active duty to establish the conditions of a European public sphere in which citizens can freely receive information and form opinions, not the least in the context of the European elections. This duty would first of all falls to Member States (MS). Yet where the cross-border and pan-European dimension of the public sphere is concerned, MS are obviously in less of a position to nurture adequate journalism than the EU. In this sense, in 2020 the European Centre for Press and Media Freedom (ECPMF), together with other journalists' organizations, called on EU Member States to adopt an ambitious Multiannual Financial Framework, in order to help the media sector recovering from the Covid-19 crisis, and to support independent journalism by, among others, doubling the proposed budget for Creative Europe. Indeed, from 2021, Creative Europe came to include support to the news media sector under the EU's News Initiative; and we support the proposal of raising the allocated budget.

In 2020, the European Centre for Press and Media Freedom (ECPMF[1]) together with other journalists' organizations called on EU Member States to adopt an ambitious Multiannual Financial Framework in order to help the media sector recover from the Covid-19 crisis and to support independent journalism by, among others, doubling the proposed budget for Creative

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1 https://www.ecpmf.eu/.

Europe.[2] From 2021, Creative Europe came to include support to the news media sector under the EU's News Initiative.[3] These funding programmes are not dedicated to but only indirectly benefit journalism. These include the MEDIA strand for audiovisual productions such as documentaries and investigative reporting, and on cross-border Journalism Partnerships, grants and tenders on projects in media literacy and in science journalism as well as financial instruments to support media companies. Most of these support actions are rather specific and temporal.

There are laudable exceptions in and from the MS. In 2018, the EU launched and still co-funds IJ4EU (Investigative Journalism for Europe[4]). The fund supports cross-border investigations of public interest in Europe. The consortium is led by the Vienna-based International Press Institute (IPI[5]) and includes the ECPMF, the European Journalism Centre (EJC[6]) and the Arena for Journalism in Europe.[7] In 2024/25, IJ4EU will disburse €2 million in grant funding to watchdog journalism, along with practical, editorial and legal support.

The involved institutions should evaluate the past and current measures to support news, in a multi-stakeholder process identifying those areas of European news and journalism infrastructure which are crucial for democracy but not able to be delivered by the market, and based on that, bundle the measures into a permanent fund for independent European journalism. In this respect, the EUMEPLAT WP2 has not given any evidence of European cross-border journalism, while the need for it is evident, if we want the project of a democratic Europe to succeed. It has been argued that the fundamental rights of media freedom and pluralism do not only have a defensive dimension but imply the obligation to "make every effort to ensure that the conditions for the effective exercise of fundamental rights are met. These preconditions of freedom include not least the pluralism of the media." (Cole, Ukrow & Etteldorf 2021: 36). This can be seen as an active duty to establish the conditions of a European public sphere, in which citizens can freely receive information and form opinions, not the least in the context of European elections.

As to specific of our proposal, we need to remark upon the difference with respect to the existing initiatives, which usually are rather specific in scope, and temporal: as stated, for instance, from 2021, Creative Europe came to include support to the news media sector under the EU's News Initiative. Therefore, calls for a permanent fund to support European independent journalism have been mounting. In 2020, Maltese MEP David Casa led a cross-party alliance calling on the European Commission to set up such a fund (Newsbook

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14.05.2020). Baratsits (2021: 50 ff.) is advocating a European Media Fund, suggesting a digital tax on platforms as a source for the fund (ibid.: 46). More recently, Simantke & Schumann (2023) from the European journalists' network Investigate Europe have called for a public service core funding for European journalism. In order for such programs to actually advance a critical view of EU matters, they argue, it is imperative to keep this funding program independent from the executive and politic organs. IPOL (2023) makes a European Fund for Journalism one of their central policy recommendations. It should aim to promote media pluralism and support the sector of news media in its transition towards the platform environment. The fund would exacerbate the risks of political pressure and the threats to editorial independence. "The creation of a Fund at supranational level might help in reducing the risk of political capture, on one hand; on the other hand, it might incentivize trans-national and globalized initiatives, more likely to become self-sustainable in the medium term." (ibid.: 78).

A specific quota could be allocated, finally, to the projects in investigative journalism: which is crucial for democracy and for helping independent research-based journalism, and for giving (independent) journalists the time to do in-depth research for their journalistic work. We are aware of the existing national funds for investigative journalism and on a European level[8], though the 2022 report reveals a quite low budget, probably insufficient to fulfill the goal[9].

This is laudable, but given the size of the continent and its public sphere it is nowhere near what is required. Therefore, calls for a permanent fund to support European independent journalism have been mounting. In 2020, Maltese MEP David Casa led a cross-party alliance calling on the European Commission to set up such a fund.[10] Baratsits (in Baratsits 2021: 50 ff.) is advocating a European Media Fund, suggesting a digital tax on platforms as a source for the fund (ibid.: 46). More recently, Simantke & Schumann (2023) from the European journalists' network Investigate Europe[11] have called for a public service core funding for European journalism. In order for such programmes to actually advance a critical view of EU matters, they argue, it is imperative that this funding be independent of the executive and politics.

IPOL (2023) makes a European Fund for Journalism one of their central policy recommendations. It should aim to promote media pluralism and support the sector of news media in its transition in the digital environment. The fund would exacerbate the risks of political pressure and the threats to editorial independence. "The creation of a Fund at supranational level might help in reducing the risk of political capture, on one hand; on the other hand, it

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8 See https://www.journalismfund.eu/.

9 See https://www.journalismfund.eu/sites/default/files/JF_AnnualReport_2022_v3.pdf.

10 Newsbook 14.05.2020, https://newsbook.com.mt/en/watch-casa-calls-on-ec-to-set-up-permanent-fund-to-support-journalism/.

11 https://www.investigate-europe.eu/.

might incentivize trans-national and globalized initiatives, more likely to become self-sustainable in the medium term." (ibid.: 78).

We therefore second these calls and recommend initiating a multi-stakeholder process for evaluating current measures to support news and for identifying those areas of European news and journalism practice and infrastructure which are crucial for democracy but underserved by the market. The evaluation could lead to either increasing the EU support for the two existing funds or establish another permanent fund for independent European journalism.

(1.4) Initiate a European Citizens' Assembly on the European public sphere

Short Recommendation

The EU has deployed the innovative participation format of a Citizens' Assembly for the first time in its Conference on the Future of Europe (CoFE 2021-2022), with great success.

Since the media serve the democratic, social, and cultural needs of society, and given the promising results of the CoFE, it seems natural that the Action Plan should prominently feature a European Citizens' Assembly on the European public sphere.

Recipient of the Recommendation

European Parliament and European Commission; EU Members States; Turkish Regulatory Bodies; Civil Society Organizations; General Public

Discussion

The EU has deployed the innovative participation format of a Citizens' Assembly for the first time in its Conference on the Future of Europe (CoFE 2021-2022), with great success.

Since media serve the democratic, social, and cultural needs of society and given the impact of the CoFE, it seems natural that the EU institutions should prominently feature a European Citizens' Assembly on the European public sphere. The difference, when compared to the case of the Community Media [see Recommendation (1.2)], is that the Citizens' Assembly would be a *one-time*, large-scale, inclusive opinion and decision forming process about remit and structure of the European public sphere. In contrast, recommendation (1.4) is intended to ensure and strengthen community media on a *stable, continuous* basis. Citizen participation in media governance was not a topic of our research, strictly speaking, but it is essential element of PSM which are to be governed in distance to state and market, typically

by a Broadcasting Council ale to represent society.

In its turn, citizen participation is, of course, an essential element of democracy. The EU has been aiming to strengthen participation, e.g. by establishing the European Citizens' Initiative (ECI) in the 2007 Lisbon Treaty. Since then, one million European citizens can "invite" the Commission to prepare a law proposal the citizens consider necessary. More recently, the EU-driven Citizens' Assembly in its Conference on the Future of Europe (CoFE 2021-2022) involved more than 700,000 Europeans in in-presence events, and more than 50,000 online. A Citizens' Assembly of randomly selected members of a representative sample of the population who debate political issues which are then put to a referendum was famously deployed in Ireland after the 2012–14 Constitutional Convention, where it has been institutionalized since. Other countries and regions held Citizens' Assemblies as well. The CoFE resulted in a final report including 49 proposals ranging from agriculture, climate, health, education, migration and economy through information and media, digital infrastructure and literacy to rule of Law, European democracy and decision making, transparency and cohesion within the Union[12].

The three EU Institutions have since taken these recommendations into consideration. The success has led to proposals for institutionalizing the European Citizens' Assembly and improving on its first EU version to "make this experience permanent and more impactful" (Abels et al. 2022).

Therefore, holding a European Citizens' Assembly on the European public sphere seems a logical thing to do. We recommend the EU to both invest in the CoFE and monitor in a more systematic way the informal initiatives in the field which have been organized by civil society actors.

(1.5) Support citizen journalism

Short Recommendation

The Internet has empowered "the people formerly known as the audience" (Rosen 2006) to take media into their own hands. With 'users' as active participants, the public sphere changes fundamentally. People express themselves not only in citizen and community media

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12 Conference on the Future of Europe, Report on the Final Outcome, 2022. Retrieved at: https://wayback.archive-it.org/12090/20220915201021/https:/prod-cofe-platform.s3.eu-central-1.amazonaws.com/2po250fn174z62m8g8c9ya9e62m7?response-content-disposition=inline%3B%20filename%3D%22Book_CoFE_Final_Report_EN_full.pdf%22%3B%20filename*%3DUTF-8%27%27Book_CoFE_Final_Report_EN_full.pdf&response-content-type=application%2Fpdf&X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA3LJJXGZPDFYVOW5V%2F20220915%2Feu-central-1%2Fs3%2Faws4_request&X-Amz-Date=20220915T200910Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=9da6e64b707df344c8772d076bc07e818cd0e1e0b662480f30d2f367446042e8.

but are invaluable for traditional media as well. EMRG (2022) calls for journalists to cooperate with audiences: "Journalists should perceive audiences not only as sources and recipients, but as partners in news production and dissemination – relevant actors in digitalized journalistic community."

While the idea seems quite obvious, actual practices of including citizen journalism in the domain of professional media are still rather limited. We therefore recommend encouraging efforts in research and practice to explore this promising path of enriching the journalistic sensorium of society, embedded in a citizen journalist ethics. We also support the launch for research calls for mapping the citizen journalism practices which are diffused everywhere in Europe.

Recipient of the Recommendation:

European Parliament and European Commission; Turkish Regulatory Bodies; Publishers; Journalism Schools; Scientific Community; Journalism Professional Orders and Associations; General Public

Discussion

The Internet has empowered "the people formerly known as the audience" (Rosen 2006) to take media into their own hands. With "users" as active participants, the public sphere changes fundamentally. They express themselves not only in citizen and community media but are invaluable for traditional media as well. EMRG (2022) calls for journalists to cooperate with audiences: "Journalists should perceive audiences not only as sources and recipients, but as partners in news production and dissemination – relevant actors in digitalized journalistic community."

While the idea seems quite obvious, actual practices of including citizen journalism in the domain of professional media are still rather limited. The regulatory bodies and the interested parties should therefore include efforts in research and practice to explore this promising path of enriching the journalistic sensorium of society, embedded in a citizen journalist ethics. On the practical side, we reckon that citizen journalism is still a largely debated category, and that background knowledge is necessary. A mapping of properly independent reporting in Europe is the more necessary, as it is often realized by citizens that do not recognize themselves as journalists, as still perform the very same function. As citizen journalism is a very vital sector, and yet an uncharted territory, we support the launch of research calls for the mapping of the initiatives which are diffused within the EU, and which are playing *de facto* the function of journalism, albeit in an informal way.

(1.6) Support decentralized alternatives to global commercial platforms

Short Recommendation

Social Media have come to the point where they do more harm than good. The EU has adopted the DSA as a means of reining in the global, hegemonic sharing platforms. Particularly the Covid-19 crisis and its effect on value chains made technological sovereignty a key political theme in Europe's "digital decade" (STOA 2021; Crespi *et al* 2021; Bendiek & Stürzer 2022). Therefore, the focus now should be on nurturing alternatives. The alternative to US American and Chinese mega-platforms cannot be a European mega-platform but needs to be an entirely different, decentralized architecture.

A promising development is the Fediverse, a network of decentralized and federated social platforms for short messages, video, audio, podcasts etc. The EU has taken first steps into the Fediverse already. So have PSM, civil society and academia.

We therefore recommend the EU to continue these efforts and lead a multi-stakeholder effort to develop an infrastructure for platforms in Europe, based on Free Software and Open Standards. A crucial element of this will be a European Public Digital Infrastructure Fund to improve the always precarious situation of Free Software developers.

Recipient of the recommendations

European Commission, EU funding initiatives Erasmus+ and Creative Europe, Member States, the Free Software movement

Discussion

The digital social spaces of Facebook, Youtube, Tiktok, Twitter are the issue of EUMEPLAT's research. They are optimised for the platforms' business model: maximum exposure to targeted advertising. Thanks to whistleblowers like Edward Snowden[13] and Frances Haugen[14], but also to research, we know about the negative externalities these seemingly benign 'social' services create: the all-encompassing surveillance, the mass-targeted election manipulations (Cambridge Analytica, Pro-Kremlin disinformation), the harm on the development of young people, the divisive effects on public discourse. We also know

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13 The NSA Files: Decoded, The Guardian, 2013, Retrieved at: https://www.theguardian.com/world/interactive/2013/nov/01/snowden-nsa-files-surveillance-revelations-decoded#section/6.

14 Eight things we learned from the Facebook Papers, The Verge, 25.10.2021. Retrieved at: https://www.theverge.com/22740969/facebook-files-papers-frances-haugen-whistleblower-civic-integrity.

that the platform operators are aware about these harmful effects but decide not to do anything about it,[15] unless legally forced, e.g. by the DSA.

The PSM's dilemma is that they have to be on the platforms because their audiences are there, but they do not want to be there, because these platforms are optimized for ad exposure rather than public value and for democracy-constitutive information and debate, and PSM are at the mercy of corporations as to changing technical features and house rules – and they have no alternatives. The journalists' dilemma is that their technical infrastructure from research and cross-border cooperation all the way to analytics is typically provided by Google, Facebook or Microsoft (Dachwitz & Fanta 2020). This overlaps with the dilemma of the European digital public sphere as a whole: Outside the mega-platforms there is very little of it.

EMRG (2022) urged media companies "to rethink the short-term benefits of using platforms as a distribution channel and to develop a long-term strategy of community-building through multiple means" and called on researchers to envision alternatives to the existing platforms, spaces "for a more just, diverse and democratic public sphere".

Since the 2010s, there have been reform movements to re-decentralise the Internet, from the wider Internet community, from within PSM and in various constellations of academia, civil society, politics, journalism and technology (Baratsits (ed.) 2021).

A particularly promising development is the emergence of the Fediverse, a network of decentralized social platforms federated with each other via the ActivityPub protocol, creating a whole that is more than the sum of its parts, similar to the blogosphere of the 2000s.[16] The individual, often local nodes have hundreds or thousands of users, which make all issues from moderation through recommendations to business models easier to handle than if you have to care for three billion users. The EU has added the Mastodon instance EU Voice and the Peertube EU Video to its portfolio of own communication channels.[17] Public administration and universities across Europe have been joining the Fediverse in recent months, so are media (zdf.social, ard.social, social.bbc[18]).

The EU also supports the development of the Fediverse in other ways, e.g. in its series of calls for European media platforms[19] in 2021 it awarded the contract for the first time to a civil society consortium from community media and free software with a decentralised project. DisplayEurope.eu has been launched in December 2023 and makes available multilingual

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15 E.g. 'I blew the whistle on Meta, now I won't work again', BBC 07.11.2023, https://www.bbc.com/news/technology-67343550.

16 The best known representatives are Mastodon (2016) and Peertube (2018). Since Elon Musk took over Twitter at the end of 2022, the Fediverse has gained growing popularity. A good starting point is: https://www.fediverse.to/, for news about the Fediverse: https://fediversereport.com/.

17 EUVoice: https://social.network.europa.eu/; EU Video: https://tube.network.europa.eu/

18 BBC just decided to extend its Mastodon trial (BBC R&D 13.02.2024, https://www.bbc.co.uk/rd/blog/2024-02-extending-our-mastodon-social-media-trial).

19 https://digital-strategy.ec.europa.eu/en/funding/european-media-platforms-0.

originally-created and syndicated, trustworthy, journalistic content from across Europe on a federated, sovereign, self-governed, open-source, digital infrastructure, thereby developing a European alternative to the mega-platforms.

As we can see in the strong dynamics in the Fediverse, the technical development of alternatives is far from concluded. Therefore, as a complement to the European Journalism Fund (R1.4), we recommend a similar permanent fund for the development and maintenance of public software infrastructure.

The concept has by detailed by Keller (2023) in a White Paper and is supported by the Statement on democratic digital infrastructure signed by 53 organisations.[20] A precedent in Germany is the Sovereign Tech Fund[21] which has been initiated by the Open Knowledge Foundation and the German Federal Ministry for Economic Affairs. Also, France during its Council Presidency in the first half of 2022 convened a working group of representatives from 18 EU Member States who prepared the report "Towards a Sovereign Digital Infrastructure of Commons" (Digital Assembly, 2022) in which they call on the European Union and the Member States to invest in the Digital Commons.

We recommend the EU to actively support these promising developments and coordinate and join them into a multi-stakeholder effort to develop a sovereign infrastructure for platforms in Europe.

(1.7) Include the media in the CER European critical infrastructures

Short Recommendation

The Critical Entities Resilience Directive (CER 2022) aims at "ensuring that services which are essential for the maintenance of vital societal functions ... are provided in an unobstructed manner in the internal market" (Art. 1). We cannot help but notice that the media are not included in its scope, while they provide vital societal functions. The draft of the German transposition of the CER also does not cover media but states that Federal Government and Länder may take measures concerning media. The national competent authority for CER, the

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20 https://shared-digital.eu/statement/index.html.

21 https://www.sovereigntechfund.de/.

Federal Office of Civil Protection and Disaster Assistance (BBK), indeed on its KRITIS website includes Media and Culture as one of nine sectors.

To be precise, the Directive aims at making plants and technical infrastructure resilient against natural disasters, human error, and acts of sabotage, while not dealing with the protection against disinformation or the ensuring of quality journalism. Nevertheless, defining media as critical infrastructure at the EU level would not only have practical effects of hardening their infrastructures in case of disaster situations, but it would send a clear signal that the media are not dispensable, but are in fact an essential critical infrastructure serving the democratic needs of society. We recognize that including media, and in particular PSM and community media, in the list of critical infrastructures might be more a symbolic than a substantial operation, but we do think that the very nature of European culture – either we frame it in terms of post-industrialism, knowledge society, cultural heritage, or post-materialist values – makes this step necessary.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies

Discussion

Our research, particularly in WP1, has shown that PSM are under attack across Europe. Right-wing and neoliberal parties, economists and social movements want to reduce their public funding drastically if not abolish PSM altogether. Defining PSM as a critical infrastructure would make clear that they are not dispensable and their essential operations for democracy must be ensured.

The Critical Entities Resilience Directive (CER 2022) aims at "ensuring that services which are essential for the maintenance of vital societal functions... are provided in an unobstructed manner in the internal market" (Art. 1). Media are not included in its scope.[22]

The first draft of the German transposition of the CER from 18. July 2023 also did not cover media but stated that Federal Government and Länder may take measures concerning media.[23] In the most recent draft from 21. December 2023 this passage has disappeared

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22 The Directive lists essential services in eleven sectors to which it applies. Among digital infrastructures, it includes technical services (network, ISP, CIX, DNS, CDN, cloud, data centre services), but there is not mention of media.

23 "The Federal Government and the Länder may, within the scope of their respective competences, define resilience-building measures as well as specifications for disruption monitoring, in particular in the sectors and areas of media and culture, education, care." (§5(2) KRITIS-DachG-E, 18.07.2023).

(KRITIS 2023a[24]). The national competent authority for CER, the Federal Office of Civil Protection and Disaster Assistance (BBK) on its KRITIS website does include Media and Culture as one of nine sectors, arguing that independent media play a central role in providing validated truthful information and naming disinformation as one risk.[25]

To be sure, the Directive aims at making plants and technical infrastructure resilient against natural disasters, human error and acts of sabotage, not at protection from disinformation or at ensuring quality journalism. Nevertheless, defining media as critical infrastructure on the EU level would not only have welcome practical effects of hardening them for disaster situations, but it would send a clear signal that media are not dispensable but are in fact an essential critical infrastructure serving the democratic needs of society.

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24 For the differences between the First Draft from 25.7.2023 and the Second Draft from 21.12.202 see KRITIS 2023b.

25 https://www.bbk.bund.de/DE/Themen/Kritische-Infrastrukturen/Sektoren-Branchen/Medien-Kultur/medien-kultur_node.html

Section 2 - Public Service Media and Legacy Media

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Related WP: Work-Package 1

(2.1) Support of PSM (e.g. with an amendment to the European Media Freedom Act)

Short Recommendation

Public service broadcasters are on their way to becoming full public service media platforms. However, within the Member States the legal base for this transition is often vague or reluctant. The EU should back this transformation process and support PSM according to the spirit of the 'Protocol of Amsterdam' (annexed to the EU Treaty of Amsterdam, October 2, 1997) and in light of the new developments; as otherwise the public service media, an important component of European societies, will be lost in the pay-society era. We also observe that the provision included in the Protocol, which necessitate a mandatory public value test for all PSM online offers, is in the online world an anachronistic procedure.

This support should be laid down through an amendment to the European Media Freedom Act, as the premise is set in the ENFA Article 5.3, which actually recognizes the need of "adequate, sustainable and predictable financial resources" for PSM.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies

Discussion

Public broadcasters continue to have an important role in the media market of Europe and play a fundamental service to a democratic society. Currently, they are probably going

through the most significant period in their long and distinguished history, because of fundamental changes and to the unprecedented pace of technological development. In this situation, public service broadcasters face new challenges and threats, since their operating costs are constantly rising, while their revenues remain stable or are even cut. This means that they require to become public service platforms, so that they can serve the European democratic societies in future; and many already choose this strategy. But in this scenario, PSM are forced to struggle with an outdated legal background for this.

The EU Member States already agreed "that public service broadcasting, in view of its cultural, social and democratic functions which it discharges for the common good, has a vital significance for ensuring democracy, pluralism, social cohesion, cultural and linguistic diversity"[26]. This statement was included in the Amsterdam Protocol, which has been released 26 years ago in reference to the specific of the analogue age, and now needs to be updated in relation to the digital transition and the platformization process. In short, we propose a call for a new definition of PSM in the age of platforms, as an equivalent of what the Amsterdam protocol has been for the previous era.

The Protocol is an "interpretative provision" attached to the EU Treaties that justifies the exemption from the Union's state aid prohibition which is granted for Public Service Broadcasting as it serves the needs of the society. But the provisions laid down in the Protocol - and later on in the Commission Communication on the application of State aid rules to public service broadcasting – necessitate a 'mandatory' public value test for all PSM online offers, which is in the online world an anachronistic procedure[27].

The European Media Freedom Act, which was just agreed in trilogue and awaits final approval by EP and Council, strives to "ensure the independent functioning of public service media, including by guaranteeing adequate, sustainable, and predictable financial resources[28]. These provisions do not actively support the process of transformation from Public Service Broadcast to Public Service Platforms; and therefore, they leave room for doubt and conflict as to what activities PSM can undertake in the digital world. They do not end the restrictions for PSM that are given with mandatory public value test or safeguard public broadcasters from new arguments regarding unfair competition. Therefore, a specification of the "functioning of public service media" should be agreed that is open enough to allow PSMs to use whatever digital technologies they need to reach audiences.

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[26] Retrieved from: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.C_.1999.030.01.0001.01.ENG&toc=OJ%3AC%3A1999%3A030%3ATOC.

[27] EU 2009/C 257/01, retrieved from: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52009XC1027(01).

[28] Retrieved from: https://ec.europa.eu/commission/presscorner/detail/en/ip_23_6635.

(2.2) Supporting Newspapers

Short Recommendation

Newspapers in Europe a facing a gradual disappearance, and their loss would be a major upset for the European media landscape and culture. Like public service broadcasters, the press has faced considerable economic problems in the age of new media, globalization and digitalization. Still, newspapers are part of the European culture. The European Union, regardless the difficulties, must make a difference and promote their survival in some form, also in force of projects able to connect the newspapers sector to education campaigns. Since the media develop and become older with their audiences, newspapers need new younger audiences.

Our recommendation can be split into two different strategies. Firstly, despite the tradition of public funding of the press, we support the idea of funding *individual* journalists – either employed or free-lance – based on the quality of their investigative or documentary projects. Second, we think that a strong, albeit indirect, support might be the investment in media literacy for creating a new possible audience, with a focus on how to read newspapers.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies

Discussion

In our research we saw that the number of newspapers sales is sharply declining, while on the other hand the annual percentage of people that have never read a newspaper is constantly increasing (see deliverables D1.1 and D1.2). We know that these people are mostly up to 25 years old, working class, students and unemployed. If we agree that newspapers are a constituent of the European culture, and that there is clear evidence in WP1 that newspapers are ailing, what is to be understood, is whether the EU the right level to do something about it – and if so, in which way. The press is somehow more outside the scope of the EU than the audiovisual media, primarily because it lacks the cross-border dimension of the broadcasting media. In retrospect, the hopes and efforts that the founding fathers and mothers of the EU invested into television as means of unifying the continent is still astonishing, compared with the near total absence of statements and measures concerning the press. There is an Audiovisual Media Directive, but no European press law; and similarly, press publishers have only recently and marginally been made eligible for Creative Europe funding, which is traditionally destined to audiovisual media.

The other primary reason seems to be the resistance by the press publishers

themselves. Looking from the normative vantage point of the Liberal Model, there is the widespread belief that public press subsidies constitute an undue state influence on the media, which should be prevented at all costs. This is echoed by some newspaper publishers. Mathias Döpfner, CEO of Springer and president of the German newspaper publishers' association BDZV, rejects press subsidies and in particular any funding for digital media that could compete with paper publishers. In January 2019, he said in an interview: "I'd rather see newspapers go bankrupt than lose their independence through subsidies" (in Horizont 26.02.2019) [D1.1 Patterns in media production: regional models, p. 141].

The press publishers' main political goal has been to improve their market chances. They lobbied for the end of the PSB monopoly of the airwaves and were among the first to set up commercial TV stations. They complained to the EU about PSBs moving onto the Internet trying to keep it to themselves. This resulted not only in the European Public Value Test, but also in the ban on "press-like" services in the German 12th Interstate Broadcasting Treaty (2008), forcing ZDF alone to "depublish" more than 100,000 articles and 4,000 videos, which at the time corresponded to more than eighty per cent of ZDF's online content. The same actors lobbied against limiting concentrations and prevented European media concentration legislation throughout. They lobbied for the press publishers' ancillary copyright which had failed in Germany and Spain and got it in the DSMD, as a means to make Google & Co. pay them for directing searchers to their sites. And some of them – namely, Springer, BDZV (FAZ 10.11.23) and press publishers' associations in Austria and Denmark (epd medien 39/23, 29.09.2023) – are currently starting the next campaign of complaints in Brussels against PSM, because their sites allegedly contain too much text. They want to restrict PSM to "radio-like" and "TV-like" content and ban from offering "press-like" content, such as any text beyond the title of a video. The press publishers call the EMFA a failed attempt to improve media freedom in Europe. Instead, "the EU is tightening a corset that does not address any of the problems" of the press that BDZV is seeing and rather "jeopardizes press freedom" (BDZV 15.12.2023).

BDZV is the spearhead of neoliberal ideology in the industry. On the other hand, we know that research and scientific evidence cannot justify the fear over public press funding. Hallin and Mancini pointed out that "critical professionalism" in journalism in Northern Europe grew in the 1970s when subsidies were highest (Hallin & Mancini 2004: 163). Western democracies with a high level of press funding, such as in the Nordic countries, are characterized by a high degree of media freedom, a very professional media environment and a low degree of political parallelism. In their comparative analysis of press subsidies in seven European countries and Canada, Cornils *et al* (2021) provided a legal analysis on how such subsidies can be constructed in a rational-legal way while safeguarding fundamental rights and competition, and first and foremost the requirement of State neutrality. The most dramatic market failure, and therefore need for public support that they could find, is in the case of local media [D1.1 Patterns in media production: regional models, p. 141 ff.].

It seems that the anti-public subsidies ideology-based lobbying of Springer, BDZV and others has led to a situation where the EU steers clear of even mentioning the press publishers,

and instead talks about support for "audiovisual and news media" and for journalism. In fact, the EU has adopted a growing number of acts with relevance to journalism: protection of whistleblowers, freedom of information, anti-SLAPP, Media Ownership Monitor, and the more. Along the same line, the EU eventually came out with the most extensive European media law, the EMFA (version adopted by the EP on 03.10.2023). Such law only mentions the press in the definition of media services and publishers in its goal to safeguard editorial independence against interference by media owners, publishers and managers. No wonder the BDZV is not happy about that.

And in fact, the EU has adopted a growing number of measures for funding journalism. From 2021, Creative Europe came to include support to the news media sector under the EU's News Initiatives. These include support for minority language media, for media literacy and for information measures relating to the EU cohesion policy. In response to the Covid-19 crisis, the Commission in December 2020 adopted an action plan to support the recovery and transformation of the media and audio-visual sector. In its European Democracy Action Plan, the Commission will work closely with Member States and stakeholders to improve the safety of journalists and provide sustainable funding for projects focusing on legal and practical assistance to journalists in the EU and elsewhere. Finally, the budget for the Creative Europe programme for 2021-2027 has increased by 80% compared to the previous period to approximately €2.5 billion (EC: Media freedom and pluralism).

A major complication brought about by our proposal is the need to clarify who the beneficiaries of the public support should be – i.e., the press publishers, the media companies, or the journalists themselves. What is to be avoided, is to simply fund the media companies, which would maybe help them for some purposes - delivery of printed papers, production, digitization, and innovation – while not producing positive externalities in society at large. We would therefore propose tailored actions targeted to specific categories of population and non-readers (also complementary to media literacy programs), rather than directly supporting publishers. A second recommendation is that a strong, albeit indirect, support might be the investment in media literacy for creating a new possible audience. An interesting idea to explore, here, is to connect the newspapers sector to the education campaign. Education and culture – like media – remain the prerogative of the MS. The 2005 UNESCO Convention on cultural diversity has also opened space for EU action which might be connectable to press / journalism. If we need to somewhat secure the future of newspapers, we need to recommend the EU to initiate programs (like the Media program in the past) to secondary schools, at least. Not only initiatives like how to publish a school paper, but *how to read a newspaper*.

(2.3) Support smaller media markets

Short Recommendation

The developments in the communications field cannot easily be followed by the smaller European countries in terms of power, resources, and market size. The policies of the smaller countries must take in account the policies of larger countries, rather than the other way around.

The result is that those countries, in most cases, try to cope with the overall changes in the European media landscape. The EU must adopt a policy framework that will help with funding and expertise to smaller EU members to better adjust their policies to the new initiatives and developments.

A possible solution is to bring back to existence the sub-cluster of the Media program, aiming at supporting the audiovisual production in small countries. This would be a countermeasure to the role played by the major companies, which are investing more in the already equipped countries and in the traditional Big Five markets; and when they do move to smaller countries in Central-Eastern Europe, they apply a dumping if not a predatory strategy, for the exploitation of cheaper labor. An alternative solution is the use of fiscal leverage in favor of smaller countries, which might limit an additional problem, which is the tendency of some of these countries to provide tax shelters and exemptions for the global companies.

Recipient of the Recommendation

European Parliament and European Commission; EU Funding Projects; EU Member States; Turkish Regulatory Bodies

Discussion

That size matters and small countries and languages need special support is common wisdom. The EU is actively addressing the language problem, for instance with support for subtitling Arte.tv, and with calls that require the platforms to provide content in 15 languages. Another notable example is DisplayEurope.eu, which was just launched, starting with 20 languages.

The EU has witnessed significant transformations in the media landscape over the past few decades, driven by technological advancements and changes in media consumption patterns. As the EU strives to maintain a cohesive information space and uphold democratic values, it becomes increasingly imperative to adopt a media policy framework that supports smaller Member States in adapting to these new initiatives and developments. This recommendation will delve into the necessity for the EU to provide funding and expertise to smaller Member States to enhance their media policies and priorities, emphasizing the benefits for democracy, media pluralism, and regional cohesion. Smaller States often lack the resources and expertise to keep pace with new technological and media changes, potentially leading to information inequalities. The rise of digital platforms has given rise to concerns about media concentration and the spread of misinformation. Smaller Member States may be

particularly vulnerable to these issues, necessitating a coordinated EU response.

A fragmented media policy landscape within the EU can lead to regulatory inconsistencies and market distortions. Harmonizing media policies can create a level playing field for media outlets and promote fair competition. Smaller Member States often face budgetary constraints that hinder their ability to invest in media infrastructure and innovation. The EU should allocate funds to support the development and modernization of media landscapes in these states. Expertise and best practices in media policy can be transferred from larger, more advanced Member States to smaller ones. This knowledge exchange can facilitate the development of robust media policies tailored to the needs of each member state.

Additionally, a common media policy framework can foster a sense of solidarity and cohesion among EU member states. It would help filling information gaps between larger and smaller States and promoting cross-border media collaborations. By providing support to smaller Member States, the EU can contribute to the diversification of media ownership and content, thereby increasing media pluralism and reducing the risk of media monopolies. Needless to say, an in-depth preliminary investigation is needed, in order to sort out the linguistic areas to be addressed, and also the technological platforms that are to be taken into exam more urgently.

Finally, we have to remark upon a risk brought about by this intervention. Evidence from WP3 shows that media production in smaller markets often work against Europeanization, so to speak, and for several reasons: the defense of the national culture and language; the arrangement of cooperation agreements at the regional level (i.e., the Baltics); and the propension to attract the investments of global and US-based companies (i.e., Iceland in the movie location and co-production market). A careful consideration of the possible negative externalities of this initiative would be therefore necessary.

Section 3 - Theatrical movies and VOD platforms

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Related WP: WP1 and WP3

(3.1) Keep stimulating co-productions, but focus more on the promotion of European movies

Short Recommendation

Evidence from our research shows that the number of European movies has been almost regularly increasing in the last three decades (see deliverable D1.3). The investments in co-productions, in this sense, proved to be effective in fueling the European movie industry. A recurring problem, this notwithstanding, is that budgets for promoting and advertising films in Europe are often insufficient, especially compared to those for Hollywood movies. A policy in this regard would help European content to be more visible for film theater audiences, as well as it would be beneficial for the movies' careers on other screens and platforms. Existing policies on European and national/regional level in relation to distributing and exhibiting European film (Creative Europe, national and regional funding agencies) should be strengthened, and Creative Europe should more extensively promote European films (i.e., by introducing a sort of "best of Europe" label).

Recipient of the Recommendation

European Parliament and European Commission; Turkish Regulatory Bodies; Creative Europe Program; European Media Associations; Small Scale European Movie Producers

Discussion

Evidence from our research shows that the number of European movies has been almost regularly increasing in the last decades (see deliverable D1.3). The investments in co-

productions, in this sense, proved to be effective in fueling the European movie industry. A recurring problem, this notwithstanding, is that budgets for promoting and advertising films in Europe are often insufficient, especially compared to budgets for Hollywood movies. Additionally, there is some gap in the current regulation of the movie market. As platforms are global and their main goal is to reach a likewise global audience, they invest in promoting USA productions and co-productions or their own productions; while, based on the EU directives, they do not have the duty to promote European productions. At the same time the promotion of EU movies and TV series is not as prominent, aggressive, and omnipresent as that of USA productions. The responsibility to promote a given work is actually up to the producers, without a well-defined framework to be implemented. Our proposal is to open more opportunities for supporting the promotion of EU content. At the same time, an initiative for cooperation between European communication agencies and European movie and TV series producers could result in an improved promotion of European content. A policy in this regard would help European content to be more visible for film theater audiences, as well as it would be beneficial for the movies' careers on other screens and platforms. Existing policies at the European, national and regional level in relation to distributing and exhibiting European film (Creative Europe, national and regional funding agencies) should be strengthened, and Creative Europe should promote more extensively European films (i.e., by introducing a sort of "best of Europe" label).

A first way would be to explore new forms of promotion. Even though marketing can be an expensive affair, introducing more social media influencers to film screenings might help reaching the respected targeted groups, and especially the young. For what concerns the video-on-demand platforms, it is necessary to take into account, as much as possible, the generic behavior of a recommendation algorithm, and its possible use to promote European films. An alternative is to support an alternative platform in which a higher degree of diversity would be encouraged, and in which the European specificities in regard to original language, culture and other factors would showcase the richness of European movie production – by also making the European platform attractive for diverse groups such as European diaspora, global citizens, and the more. In all cases, we advance that investments in pan-European promotion should be thoroughly planned, as many films have only a national or regional appeal, and we support the idea of a cross-platform intervention, covering all the market windows and releases.

As a best practice, we signal the activity of the Swedish-based network *Film I Väst*, both for their promotion activities and their research contribution (see, for instance, the *All that is solid melts into the air* report).

(3.2) Make possible the access to industrial data about the media

Short Recommendation

The recommendation deals with three different types of data: (1) industrial and commercial data; (2) currently available reports; and (3) scientific data. For what concerns industrial data, this is, considering all evidence, the most difficult problem to tackle. Both Facebook and Twitter restricted the access to their respective APIs, thus making social media discourse analysis an expensive affair, and access to VOD platforms data is very limited as well[29].

The data made available by existing organizations is far from complete, in its turn. We would recommend an effort in two directions. Firstly, to assess the gaps that need to be filled: for instance, the European Broadcasting Union releases a very few data about radio, and the same for the newspapers circulation and reading, as released by the World Association of News Publishers- INFRA. Secondly, the existing data are in many cases inconsistent and patchy, as the methodology and the metrics vary over time. For what concerns these data, we also noticed that many of them – the EAO yearbooks and the EuroBarometer reports, for instance – are only available in aggregate form. We recommend working at a properly data repository, with the raw datasets made available in Open Access and in machine readable format.

For what concerns the academic data, we recommend the EU competent organs to coordinate these initiatives and to favor the building of a common data archive for all projects (i.e., Horizon 2020, Horizon Europe, European Media Monitor, and the more), in which all data would be stored by following the same architecture and by using a common set of metadata. Finally, there is also a need to generate high-quality data, for instance in relation to audience behavior, as data about what people do with the media is a main blind-spot. For this goal, we suggest launching some preliminary activities – monitoring, research calls about media audiences - with the possible mid-term goal of building a permanent Observatory on European Audiences.

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29 The recommendations and the related deliverables have been drawn before Netflix's decision of releasing some commercial data, at the beginning of the 2024. Whether this would stay an exception, or open a new stage, it is not possible to tell, at the moment.

Recipients of the Recommendation

European Parliament and European Commission; European Audiovisual Observatory; European Broadcasting Union; European and National Media Associations; Scientific Community; Turkish Regulatory Bodies

Discussion

Major players in the streaming and other audiovisual business mostly have a protective attitude towards the enormous sets of data they have on production, programming/catalogues, distribution/flows, and audience behavior/consumption of audiovisual fare. If these data could be used on an aggregated level, and by respecting the GDPR provisions, this could help European decision-makers and stakeholders in their strategies to develop a productive policy and strengthen the European audiovisual sector. Inspiration could be found in initiatives like the Euromedia Ownership Monitor (EurOMo), that aims at enhancing transparency of news media ownership and control in European Union countries. EurOMo monitors media ownership transparency by making available a database and producing country reports. A similar initiative for continued research on ownership is useful in a sector where major global and transnational audiovisual and multimedia actors utilize various strategies to control the (European) market(s). In this context there is a need to adhere to clear definitions of the different types of actors like in the audiovisual sphere with, for instance, a need to clearly define who is an independent producer and to continue to press for adherence to that definition, despite pressure towards economies of scale.

A major problem in the EUMEPLAT experience is the lack of data, or the inconsistency of those which are indeed available. This is the more relevant, when one considers that data do not provide any solution per se, but they do shape the knowledge basis on which the regulatory intervention has to be built. Here we will detail the different cases of industrial data; reports from European; and academic data.

For what concerns industrial data, this is in all evidence the most difficult problem to tackle. Firstly, Facebook and more recently Twitter restricted the access to their respective APIs, thus making social media discourse analysis an expensive affair – not to mention the ethical implications of funding those US companies with European money. Access to VOD platforms data is very limited as well, besides the recent exception of Netflix, which has made available some audience data after the conclusion of our related research task, in WP3. Here we limit ourselves to remark upon the problem, which requires high-level political decisions (for the suggested data policy related to disinformation, see the recommendation 4.5, below).

The data made available by existing organizations and third parties is far from complete, in its turn. We would recommend an effort in two directions. Firstly, to assess the gaps that need to be filled: for instance, the European Broadcasting Union releases a very few data about radio, and the same for newspapers data, as made public by the World Association of News Publishers- INFRA. Secondly, the existing data are in many cases inconsistent and

patchy, as the methodology and the metrics vary over time: though we recognize that this is a common aspect of statistical research, we do recommend reaching a final agreement upon the data have to be collected, and the metadata for archiving them as well. For what concerns this aspect, we also noticed that many data – the EAO yearbooks and the EuroBarometer reports, for instance – are only available in aggregate form. We recommend working at a properly data repository, with the raw datasets made available in Open Access and in machine readable format.

For what concerns the academic data, the EUMEPLAT network adheres to the Open Data pilot project (on a voluntary basis, as it was not mandatory at the time), and therefore we will upload on Zenodo all our public documents: reports, draft materials, and methodological protocols. We recommend the EU competent organs to coordinate these initiatives and to favor the setting-up of a common archive for all projects (i.e., Horizon 2020, Horizon Europe, European Media Monitor, and the more), in which all data would be stored by following the same architecture and by using a common set of metadata. Finally, there is also a need to generate high-quality data, for instance in relation to audience behavior, as data about what people do with the media is a main blind-spot. For this goal, we suggest launching some preliminary activities – monitoring, research calls about media audiences - with the possible mid-term goal of building a permanent Observatory on European audiences.

(3.3) Improve the 30% quota policy for VOD platforms

Short Recommendation

The revised AVMSD extends certain audiovisual rules to video-sharing platforms, including certain "hybrid" services such as social media, where the provision of videos and programs is not the principal purpose of the service, but still constituting an 'essential functionality' thereof. In fact, 32% of all films and TV-series seasons in VOD catalogues are European productions, and 21% are of EU27 origin, as revealed by the European Audiovisual Observatory. Out of the 27,944 European films released in cinemas between 1996 and 2020, some 59% were available on VOD in May 2021.

Our research clearly shows that on VOD platforms people mostly watch films and TV series produced in the last three years. In the application of the current EU regulation, the platforms do include European content, while the recommendation systems make them still difficult to find, and no requirement is in place about the quality and features of those titles.

Our proposal is to keep the 30% European content rule while adding a requirement that this applies to *new* European content, such as those produced in the last 3 years. The goal is to make appealing European content to be available across Europe, so that Europeans can access them. We also recommend two minor interventions. The first one is to place attention to the way the *non-national* label is used for coding the European titles; as in many cases, and

in a few countries, the national movies are counted as European (which is correct, materially speaking, while violating the very principle of the quota system). The second one is to monitor the implementation of the so-called Netflix Tax, as it is interpreted and applied in very different ways in the EU Member States, not only in respect to the planned sanctions, but also as to the method for calculating the fee (i.e., percentage of advertising revenue, of programming budget, on the number of subscribers – for this, see deliverable D3.4).

Recipient of the Recommendation

European Parliament and European Commission; National Media Authorities

Discussion

The revised AVMSD extends certain audiovisual rules to video-sharing platforms, including certain 'hybrid' services such as social media, where the provision of videos and programs is not the principal purpose of the service, while still constituting an "essential functionality" thereof. In fact, 32% of all films and TV-series seasons in VOD catalogues are European productions, and 21% are of EU27 origin, as revealed by the European Audiovisual Observatory. Out of the 27,944 European films released in cinemas between 1996 and 2020, some 59% were available on VOD in May 2021.

Our research clearly shows that on VOD platforms people are watching films and TV series produced in the last three years. In the application of the current EU regulation, the platforms do include European content, while the recommendation systems make them still difficult to find, and no requirement is in place about the quality and features of those titles.

The Audiovisual Media Services Directive (AVMSD Article 13[1]) stimulates Member States to think about measures (like quotas or a fiscal levy) to ensure that on-demand audiovisual media services provided by VODs under their jurisdiction promote, where practicable and by appropriate means, the production of and access to European works. In practice, regulations across Europe are quite diverse. More could be done in order to coordinate legislation and streamline policies across Europe in order to strengthen the development of the European audiovisual and media industries. There is a call for a clearer transparency obligation on how the quota system is respected, how prominence requirements are met, and how streamers spread spending across different countries; as well as reporting on what producer titles have done in their catalogue, especially if funded or co-funded by public bodies. There is, also, a call for a clear framework (whether or not negotiated by producer unions, or through a revision of the AVMS) to return secondary rights to producers when negotiating with streamers on originals (for the assessment of this measure, see recommendation 1.6).

An additional problem is that the quota is treated differently in different places, and the same can be told about the so-called Netflix Tax (see the EUMEPLAT deliverable 3.4). For

what concerns this specific recommendation, we noticed that the national productions are in some cases counted as European, which sets a false incentive if you want to increase cross-border consumption. Therefore, the recommendation is to explicitly require the European works to be from other European countries than one's own. This would require a harmonization of the rules, which might make it necessary to review the Audiovisual Media Services Directive, and if necessary, to transform it in a more restrictive Audiovisual Media Services Regulation, to be implemented in the Member States.

Our proposal is to keep the 30% European content rule while adding a requirement that this applies to *new* European content produced in the last 3 years. The goal is to make appealing European content to be available across Europe, so that Europeans can access them. We also recommend two minor interventions. The first one is to place attention to the way the *non-national* label is used for coding the European titles; as in many cases, and in a few countries, the national movies are counted as European (which is correct, materially speaking, while violating the very principle of the quota system). The second one is to monitor the implementation of the so-called Netflix Tax, as it is interpreted and applied in very different ways in the EU Member States, not only in respect to the planned sanctions, but also as to the method for calculating the fee (i.e., percentage of advertising revenue, of the programming budget, on the number of subscribers – for this, see deliverable D3.4).

(3.4) Favor the use of European national languages in VOD platforms

Short Recommendation

It is a plain state of fact that the new generations of Europeans are growing in a new cultural environment, watching movies in the English language and therefore, to some extent, observing the world through an Anglo-American perspective. This danger related to cultural Europeanization is the more evident in small countries: as where the internal market is not big enough to provide revenues, VOD companies more rarely provide translations into the national language. We suggest putting this criticality on the agenda, by exploring the possibility of forcing VODs to produce – in form of dubbing of subtitles – products in the national language, as a token of their responsibility towards the local markets. The possible negative externalities of an intervention in this matter are further developed in the Discussion section.

Recipient of the Recommendation

European Parliament and European Commission; National Media Regulatory Bodies; VOD Providers

Discussion

It is a state of fact that the Europeans of new generations are growing in a new cultural environment, watching movies and TV-series in the English language and therefore, to some extent, observing the world through an Anglo-American perspective. This danger related to cultural Europeanization is the more evident in small countries: as where the internal market is not big enough to provide revenues, VOD companies more rarely provide translations into the national language. We suggest putting this criticality in the agenda, by exploring the possibility of forcing VODs to produce – in form of dubbing of subtitles – products in the national language, as a token of their responsibility towards the local markets.

We know that in most of the cases the audiences prefer to watch movies and TV-series in their national language. When this is not possible, audiences tend to choose English: not as subtitles, but as the main language of the film/TV series in question. That puts at risk all non-national European movies, apart from those made in English. If the AVMSD included the obligation to include national language to all European movies/TV series, that would make those movies and TV-series more accessible to European audiences.

We reckon that a regulatory intervention in this respect is not easy to plan, and therefore we will shortly discuss the expected negative externalities of the two possible options: a legal obligation to provide national translations; and the use of a financial leverage for the same purpose. The legal requirement, to start with, would come with two possible risks. Firstly, VOD providers may reduce the number of titles available in small countries, therefore exacerbating an already existing tendency, which is the wide disparities in terms of catalogue sizes, in the different nations. On a sample of 138 TVOD platforms, for instance, the size varies from 27 to 20,314 movies made available; on a sample of 420 SVOD catalogues, the size ranges from 12 to 27,262 titles, with distribution apparently following the power-law in both cases (see Grece & Jiménez Pumares 2021). Alternatively, the VOD companies might simply raise the subscription price in such countries, therefore excluding a part of the population from their offer. The financial support to the companies, on the other hand, would raise serious ethical dilemmas, as to whether the EU budget should be transferred to US-based companies.

As the risk of Americanization is already tangible, and as the current situation inevitably leads to an increasing use of piracy contents – with people watching illegally dubbed movies – we would suggest, in any case, to address the problem. What we would recommend, is to point to the valorization of the internal resources, in each market: for instance, by mapping the dubbing and subtitling communities scattered in Europe and involve them; or by making the funding contingent to the employment of workers, either for subbing or subtitling, in the considered country.

(3.5) Focus on the findability of European movies in VODs

Short Recommendation

That the mere availability of European movies in VOD platforms is not enough has been repeatedly observed, and it is also confirmed by our findings (see deliverable D3.2). It is a common impression that the algorithms tend to favor US contents, and that the European titles are hidden very deep, albeit being technically and legally available. We reckon that any intervention in this field would be difficult to implement, but we do support initiatives in that direction. As a possible solution, we put the forward the possibility – laid out by Petr Szczepanik, from Charles University, during the last WP5 meeting in Prague – of at least regulating the use of metadata for making them consistent and harmonizing them.

Recipient of the Recommendation

European Parliament and European Commission; National Media Regulatory Bodies; VOD Providers

Discussion

That the mere availability of European movies in VOD platforms is not enough has been repeatedly observed, and it is also confirmed by our findings. According to a 2022 report of the European Audiovisual Observatory, for instance, 32% of all works included in VOD catalogues in Europe are European, with the EU27 accounting for 21% of the total (*Film and TV content in TV, SVOD and FOD Catalogues*). The data related to the top-watched movies and TV-shows (see the EUMEPLAT deliverables D3.2 and D3.3) simply shows otherwise, with European titles getting little notoriety on Amazon, HBO, and Netflix – and no notoriety whatsoever, in the cases of Apple Tv, Google TV, and Disney+. It is a common impression, in sum, that the algorithms tend to favor US contents, and that the European titles are hidden very deep, albeit being technically and legally available.

This issue has been discussed in two EUMEPLAT-related events: the International Institute of Communications workshop *Insights for a balanced regulation: considering platforms benefits and protection* (online, December 2021); and the final event of the Jean Monnet project on *The European Media Platform Policy* organized by Josef Trappel, with the participation of the EUMEPLAT Principal Investigator (Brussels, July 2023). In both cases - at the presence of researchers, policymakers, regulators, and market operators – it has been highlighted that a serious regulation is hardly possible without putting the hands on the material devices that regulate the visibility of contents: namely, the set menu of the smart TV; and the recommendation algorithms in VOD platforms.

Therefore, we reckon that any intervention in this field would be difficult to implement, for both technical and legal reasons. This notwithstanding, we do support initiatives in that direction. As a possible solution, we put the forward the possibility – laid out by Petr Szczepanik from Charles University during the last WP5 meeting in Prague – of at least regulating the use of metadata for making them consistent and harmonizing them.

Section 4 - Opening up to civil society

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Related WP: Work-Package 2, Work-Package 4, and Work-Package 5

(4.1) Define more tailored literacy programs and develop a plan for algorithmic literacy

Short Recommendation

As the on-line experience has gained an unprecedented centrality for both people's private experiences and public citizenship – and in relation to the most disparate aspects of their life – media literacy can no longer be considered as a monolithic category, while requiring a set of specialized skills and teaching methods. This new type of education could involve the formal obligation in primary and secondary schools, for the inclusion in the curricula of a critical pedagogy of the citizens, adjusted to the level of education. It could concern either the introduction of specialized and dedicated courses and activities, or the redesigning of existing courses to bring in the spirit and practice of citizenship and democracy. Also, in tertiary education, the study programs may include a range of elective courses – theoretical, practice-based or apprenticeships-– that involve competences of active citizenship, designed to serve the needs and requirements of their fields of study. The formal inclusion of digital citizenship education into didactic curriculum may be connected to the evaluation and accreditation of these programs, but also to the education and training of teachers and professors.

In particular, and how is to some extent inevitable, we observe a certain degree of ignorance about the effects of algorithms, either positive or negative. This applies, for example, to those who select contents of any kinds (e-shopping, video-on-demand, and so on) by following the indications of the recommendation algorithm. So, although studies have been carried out that deal with the plain resonance chambers or bubble filters, while others also limit their impact, there is still little transparency about how the system actually works.

For the specific of algorithmic literacy, our recommendation is therefore based on two instances. Firstly, platform owners and online services should be requested to make available

some information about the algorithms that organize people's behavior, in Open Access format (if anything, for the scientific community and civil society organizations to inspect it). Secondly, a specific form of media literacy will be necessary in the years to come, as emerged from a number of research tasks, and in a more explicit fashion during the Delphi+ workshop sessions (see WP5, and deliverable D5.1 in particular). Literacy programs should ideally involve both the academy and the school, with a focus on the most recent innovations, such as the generative AI.

This recommendation is also in line with, and partially inspired by the European Media Freedom Act, and precisely Article 12, which discusses the role of European Board for Media Services with the purpose of "exchang[ing] experiences and best practices on media literacy, including to foster the development and use of effective measures and tools to strengthen media literacy"[30]. Given the centrality of the social media debate for the shaping of contemporary public opinion in Europe, we also suggest including *peace education* in these didactic formulas.

Recipient of the Recommendation

European Parliament, European Council, and European Commission; EU Member States; Civil Society Organizations; Education Institutions; Scientific Community; Platform Companies; Turkish Regulatory Bodies

Discussion

As the on-line experience has gained an unprecedented centrality for both people's private experiences and public citizenship – and in relation to the most disparate aspects of their life – media literacy can no longer be considered as a monolithic category, while requiring a set of specialized skills and teaching methods. This new type of education could involve the formal obligation in primary and secondary schools for the inclusion in the curricula of a critical pedagogy of the citizens, adjusted to the level of education. It could concern either the introduction of specialized and dedicated courses and activities, or the redesigning of existing courses to bring in the spirit and practice of citizenship and democracy. Also, in tertiary education, the study programs may include a range of elective courses – theoretical, practice-

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30 European Media Freedom Act proposal, January 19, 2024; retrieved at: https://data.consilium.europa.eu/doc/document/ST-5622-2024-INIT/en/pdf.

based or apprenticeships-– that involve competences of active citizenship, designed to serve the needs and requirements of their fields of study. The formal inclusion of digital citizenship education into didactic curriculum may be connected to the evaluation and accreditation of these programs, but also to the education and training of teachers and professors.

In particular, and how is to some extent inevitable, we observe a certain degree of ignorance about the effects of algorithms, either positive or negative. This applies, for example, to those who select contents of any kinds (e-shopping, video-on-demand, and so on) by following the indications of the recommendation algorithm. So, although studies have been carried out that deal with the plain resonance chambers or bubble filters, while others also limit their impact, there is still little transparency about how the system actually works.

Our starting point is that the need for greater and more specialized literacy in the face of media and digital evolution is evident in several reports. Of special interest is the impact on young people who mostly get their information through social networks (as reflected in the Reuters Institute's *Digital News Reports*[31]) whose operating dynamics are driven by these algorithms. In 2017, similarly, the Pew Research Center dedicated one section of its report *Code-Dependent: Pros and Cons of the Algorithm Age* to the growing need for algorithmic literacy (following the arguments of experts and professors)[32]. More recently, in 2023, UNESCO launched a call to define algorithmic literacy from a perspective evidencing the growing interest in this issue[33]. At the institutional level, though, it remains unclear how to combine the existing initiatives on media literacy with the features which are specific to *algorithm* literacy (for what concerns the European organizations, see for instance the EU Media Literacy policy[34], or the Media Literacy for Citizenship, supported by the Council of Europe[35]).

For this recommendation, we are also referring to the latest Eurydice report on citizenship education in Europe (European Commission, 2018), according to which the following competence areas (either areas of knowledge, skills, or attitudes) need to be included in citizenship education:

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31 See https://www.digitalnewsreport.org.

32 Pew Internet Research Center, Theme 7: The need grows for algorithmic literacy, transparency and oversight, 2017, Retrieved at: https://www.pewresearch.org/internet/2017/02/08/theme-7-the-need-grows-for-algorithmic-literacy-transparency-and-oversight/.

33 See https://www.unesco.org/sites/default/files/medias/fichiers/2023/06/Definition-of-algorithm-data-literacy-UNESCO-call-for-contributions-en.pdf?TSPD_101_R0=080713870fab20004c50510a196bf7b6ad46e51f43aee5c84f4e38188d8e9caf007ee14e5d73c68f08a2730c5a14300089faacd10b300ec84104e825c00b1a12fbe1789c138d4d6cb86bb4a826fc8af18a0ca637f6d5722101acf05eba557422.

34 See https://digital-strategy.ec.europa.eu/en/policies/media-literacy.

35 See https://eavi.eu/.

"Interacting effectively and constructively with others, including personal development (self-confidence, personal responsibility and empathy); communicating and listening; and cooperating with others.

Thinking critically, including reasoning and analysis, media literacy, knowledge and discovery, and use of sources.

Acting in a socially responsible manner, including respect for the principle of justice and human rights; respect for other human beings, for other cultures and other religions; developing a sense of belonging; and understanding issues relating to the environment and sustainability.

Acting democratically, including respect for democratic principles; knowledge and understanding of political processes, institutions and organizations; and knowledge and understanding of fundamental social and political concepts".

It is our belief that such goals can be reached by strengthening people's agency, and in particular their ability of making use of digital platforms and services for their goals. Although bottom-up approaches yield more thorough and enduring solutions, innovative structural proposals may in some cases serve as a game-changer. Therefore, an advanced media literacy offer should also deal with the experimentation in design of the interaction on platforms, into which - with the hope to come up with game-changing innovations, in the long run - we would recommend putting more effort. An example can be illustrative of the importance of focusing on the design of the interaction - or on the debate around it - even for non-skilled users. This specific sub-recommendation builds on the idea that, not just the whole design, but also the *starting points* and positions of a particular discussion are consequential. Starting points – or original posts in general – thus may be distinguished in accordance with where they come from: debates initiated by trusted civil society organizations such as the Amnesty International, Corporate Watch, and WHO may have a different status than a debate initiated by a personal account. The rationale in distinguishing the personal and institutional accounts is that the institutions have a certain conduct that is monitored by their membership and audience, and they have a peculiar accountability that individual users don't have.

The importance of more tailored and less generic literacy programs has emerged from many tasks: the results from WP2 and from WP5, and in particular from the future scenario analysis and from the back-casting method – about how to avoid threats to those future scenarios – in tasks 5.1, 5.2, and 5.3. Critical pedagogy has been discussed in task 5.1, whilst the theme of peace education comes for the cultural change scenario in task 5.4, dealing with how to avoid the intensification of conflict. The need for improvement or increase in *algorithm literacy* and education was also mentioned, repeatedly, in the future scenarios, and in particular in the one related to the so-called EU Justice League of Literacy, that accentuated the need for international cooperation in an educational organization powered by all EU Member States. In particular, a very likely scenario imagines a future where algorithm literacy in European society is high, accessible as the most basic needs, and it is coordinated at the trans-national level by a separate organization called the European Justice League of Literacy.

Besides the explicit and half-serious reference to science-fiction figures, which is a common trigger of people's imagination, algorithm literacy was described as the understanding of what technology does, and how it is taking away people's choice or providing them with the choice *of not really providing a choice* (Delphi+ Participant 5). The organization's goal, therefore, would be to apply an independent spaceship approach that finds an easy way to explain to people what algorithms are doing to their lives and what that makes to their choice.

Out of the metaphor, we do support the idea of a strong investment in digital and algorithm literacy. In particular, we suggest the aggregation of Media and Information Literacy (MIL) and Peace Education (including peace building and conflict transformation approaches), which implies cross-fertilizing the existing efforts in relationship to both formal/informal educational fields. Arguably, there still exists a knowledge gap in how these two fields intersect, which necessitates the creation of or more centers of expertise at a European level, and impulse funding for additional research. Moreover, the existing expertise in both fields should be stimulated to engage in dialogues with each other, resulting also in more practical outcomes — at the European level — such as the identification and stimulation of best and good practices of this aggregation, the exchange of teaching experiences and the development of course models (and course ware) at different educational levels. Based on the expected possible externalities and cross-fertilization of these initiatives, we support the idea of including peace education into the media literacy programs.

Narrowing down the discourse to the sole field of algorithmic literacy, our recommendation is based on two instances. Firstly, platform owners and online services should be requested to make available some information about the algorithms that organize people's behavior, in a standard and accessible Open Access format (if anything, for scientific community and civil society organizations inspecting it). Secondly, a specific form of media literacy will be necessary in the years to come, as emerged from a number of research tasks, and in a more explicit fashion during the Delphi+ workshops. Literacy programs should involve both the academy and the school, with a focus on the most recent innovations, such as the generative AI. Our recommendation is also in line with, and partially inspired by the European Media Freedom Act, and precisely Article 12, which introduces the European Board for Media Services with the purpose of "exchang[ing] experiences and best practices on media literacy,

including to foster the development and use of effective measures and tools to strengthen media literacy"[36].

(4.2) Call for a participatory productive ethics

Short Recommendation

We propose the development of an over-arching Participatory Production Ethics, which will group the already existing but fragmented initiatives in a variety of societal domains (e.g., the initiatives against cyber-bullying). As this is a substantial social change project, requiring the involvement of citizens and platform users, a participatory bottom-up approach is unavoidable. An operational roadmap for stakeholder involvement will need to be created, in order to set up a large- scale, expert-supported, participatory process, making use of (by now accepted) methods for citizen participation such as citizen assemblies. In a next stage, educational processes—at both formal and informal levels (ranging from the educational system to communication platforms)—need to be organized to mainstream (or hegemonize) these Participatory Production Ethics. In terms of principles, the recommendation relies on the recognition of the user's role as a fundamental part of both social media deliberation and on-line economy, and a fundamental believe in the ethical-democratic capacities of European citizens, which need to be protected and stimulated.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies; Civil Society Organizations; Education Institutions; Platforms Companies

Discussion

We propose the development of an over-arching Participatory Production Ethics, which will group the already existing but fragmented initiatives in a variety of societal domains (e.g., the initiatives against cyber-bullying). As this is a substantial social change project, requiring

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36 European Media Freedom Act proposal, January 19, 2024; retrieved at: https://data.consilium.europa.eu/doc/document/ST-5622-2024-INIT/en/pdf.

citizen/platform user involvement, a participatory bottom-up approach is unavoidable, a roadmap for stakeholder involvement will need to be created, in order to set up a large- scale, expert-supported, participatory process, making use of (by now accepted) methods for citizen participation such as citizen assemblies. In a next stage, educational processes—at both formal and informal levels (ranging from the educational system to communication platforms)— need to be organized to mainstream (or hegemonize) these Participatory Production Ethics. In terms of principles, the recommendation relies on the recognition of the user's role as a fundamental part of both social media deliberation and on-line economy, and a fundamental believe in the ethical-democratic capacities of European citizens, which need to be protected and stimulated.

The urgency of this aspect has been mad evident in a few research tasks: for instance, in WP2, in terms of the transition of media production towards platformization; and in WP5, with the Delphi+ workshops on inclusion and multidisciplinary participation. Even though we reckon that similar ethical concerns are raised by the material dimension of the platform society - i.e., child labor, environmental destruction, electric pollution, e-waste, use of natural resources – we are focusing on the o-line activities, due to the specific goal and tasks of our project. For the fulfilling of this goal, we suggest adopting the most extensive definition of stakeholders, including institutions, platform companies, and users as well, in order to promote the valorization of co-creation and foster a participatory debate on the main threats brought about by the digitization of people's life (among which toxic debate, hate speech, and exploitation of unpaid labor). What still needs to be investigated, is whether a pattern of Participatory Production Ethics would fit for all European countries; whilst there is no doubt that the application of ethical principles will needs to be backed by adequate training and guidelines for the involved stakeholders, for which the launch of adequately funded research projects may be of invaluable importance.

(4.3) Foster the discussion with NGOs and other civil actors

Short Recommendation

Recommendation (4.3) is grounded into two major findings, and therefore deals with two major needs: the proper and non-harmful representation of gender issues; and the support to the rise of a common European public sphere. In both cases, the opening up to non-institutional players is expected to help building an alternative and positive European narrative.

In the first case, dangerous tendencies have been identified with regards to the exclusion of particular gender identities and their embodiments. In order to maintain and strengthen inclusive gender representation, it is important to give a voice to people of all genders and sexual orientations. This can be done, for example, by investing in ways to further ensure that social media platforms are inclusive for all identities. To give one concrete

example, making sure it stays possible (or it *becomes* possible, when necessary) to choose every gender when gaining access to a social media platform. Ensuring inclusivity online can help to safeguard that all genders can gain an online voice. Aside from this, to ensure inclusive, diverse and correct representations of and information on gender injustices it is important to have a wide look at what expertise might mean. As mentioned, funding networks for experts on gender theory and injustices is important. However, these experts can be people with scientific and academic backgrounds, but they can also be people who have personally experienced gender related injustices. Seeing experience as expertise can be crucial here. Concretely, this can be implemented in for example including more diverse voices in policy recommendations.

Additionally, the report on task 2.2 identified some dimensions of Europeanization that were most addressed on social media, like European Law & Governance, and Political and Economic dimensions, while some other dimensions - European Values, New Social Movements and European Public Sphere - were much less addressed. One recommendation to improve the discussions about those dimensions on social media would be to improve and support the cooperation between NGOs and other European grassroots institutions to foster the discussions of those issues in the European Public Sphere. Creating a European cooperation network of such institutions (following the example established by the EDMO European hubs) could stimulate that development.

Therefore, we call for a multi-stakeholder initiative organized into two sub-networks: a first one related to inclusion and gender themes in the broader sense (i.e., sexual orientation, intersectionality); and the second one specialized on the representation of Europe, or on what has been defined "Europeanization from below".

Recipient of the Recommendation

European Parliament and European Commission; EU Funding Institutions; EU Member States; Turkish Regulatory Bodies; Civil Society Organizations; Education Institutions; NGOs

Discussion

Recommendation (5.3) is grounded into two main findings, and therefore deals with two major needs: the proper and non-harmful representation of gender issues; and the support to the rise of a common European public sphere. In both cases, the opening up to non-institutional players is expected to help building a different narrative.

In the first case, dangerous tendencies have been identified with regards to the exclusion of particular gender identities and their embodiments. In order to maintain and strengthen inclusive gender representation, it is important to give a voice to people of all genders and sexual orientations. This can be done, for example, by investing in ways to further ensure that social media platforms are inclusive for all identities. To give one concrete

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Therefore, we call for a multi-stakeholder initiative organized into two sub-networks: a first one related to inclusion and gender themes in the broader sense (i.e., sexual orientation, intersectionality); and the second one specialized on the representation of Europe, or on what has been defined "Europeanization from below".

The recommendation is based on a series of evidence, emerging from different tasks: the semantic map of Europeanness and Europeanization (WP1) for the tension between the top-down and the bottom-up way to Europeanization; the social media analysis, showing that people's reference to Europe has usually to do with its institutions (WP2); the activation of gender as a tool of exclusion, in WP4; and the WP5 future scenarios on cultural change, gender equality (and its threats), and overcoming distrust. If we look at the already existing initiatives, and as is often the case, the problem is less the lack of programs than their coordination. Among the existing projects, we recall the Scientific Analysis and Advice on Gender Equality in the EU (SAAGE) and the European Network of Legal Experts in Gender Equality and Non-discrimination; for what concerns the consumers' right, the European Consumer Organization (BEUC); and at the national level, the Spanish Digital Social Education. Additionally, the difficulty specific to this recommendation lies in how NGOs, associations, and civil society can be persuaded to collaborate smoothly and constructively, given that every national context is different – in actuality, it is the progress made in relation to gender voices inclusivity to be different. It would be therefore necessary the creation of a network between all the concerned actors at the national level, which will provide more

inclusivity and improve the discussions with gender bias creating a safer space for media literacy; with the EU taking the role of coordinator by providing a framework to be implemented.

(4.4) Recognize the role of users and put in place positive algorithmic discrimination of contents

Short Recommendation

Regulation of the role of citizens in journalism production and dissemination through platforms – namely defining what is "fair use", clarifying copyright issues, defining eventual financial retribution for citizens collaboration in professional journalism production – should be closely observed and discussed, and some policymaking intervention may be required in the near future.

Policymakers should recognize the interactive potential for enhancing public life and the capability of destroying the journalists' monopoly over the news making process brought by the Internet. It is necessary to accept that citizens have an active presence in platforms, and that journalism standards and content can be an important part of the citizenship presence and public expression. On the platforms, citizens participate in everyday politics and community storytelling networks, and therefore possible mechanisms for rewarding them are to be investigated.

The point we need to stress, is that recognizing the role of common users holds the key to making space to different and alternative representations of social subjectivities. This is the more evident when it comes to the social media debate about gender and migration (see deliverables D4.2 and D4.3), suggesting that there may exist some European ways in how to fight discrimination and stereotypes. Another common best practice is to give social media coverage and generate buzz in support of women's rights and LBGTQ+, as well as to promote empathy and education on gender issues. This may include sharing personal stories to encourage greater understanding and awareness of gender equality. Following the instructions for the country observations of migration (WP4), many similarities were found from examples of best practice posts giving voice to immigrants – that is to say, letting immigrants telling their own story. Moreover, stories of individuals, groups, or families, rather than picturing "immigrants" as a whole, were commonly found across almost all countries. Finally, alternative media activists' projects, which suggest the need of bridging together institutional and bottom-up initiatives, as they raise awareness of the importance and seriousness of the migration issue.

Platformization and its accompanied "democratization" of news and media content has had many negative consequences, most pronounced by the vast creation and spreading of misinformation. However, a more positive view on platformization is provided in this document showing the existence and potential for good practices in fighting discrimination and

stereotypes online. Having said that, a consideration of carefulness is eventually necessary. Based on our findings (see deliverable D2.5- Anti-European fake news and what to do) and on the previous experience of a few research teams, we can state that any form of recommendation – regardless of its intentions – produces a polarization of public debate. Possible externalities in terms of radicalization are to be taken into account in advance, while planning any form of intervention in this direction. This argument, with an emphasis on the need of an ampler understanding of polarization as a systemic phenomenon, is debated in greater detail in deliverable D5.6.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies; National Media Regulators; Platform Companies; News Media; Journalism Schools; Journalism Professional Orders and Associations

Discussion

(1) Recognizing the role of users

Regulation of the role of citizens in journalism production and dissemination through platforms – namely defining what is "fair use", clarifying copyright issues, defining eventual financial retribution for citizens collaboration in professional journalism production – should be closely observed and discussed, as some policymaking intervention may be required in the near future. Policymakers should recognize the interactive potential for enhancing public life and the capability of destroying the journalists' monopoly over the news making process brought by the Internet. It is mandatory to accept that citizens have an active presence in platforms, and that journalism standards and content can be an important part of the citizenship presence and public expression. On the platforms, citizens participate in everyday politics and community storytelling networks, and therefore possible mechanisms for rewarding them are to be investigated.

It is indeed an accepted fact the role of users in producing content (the so-called User-generated Contents, UGC, or citizen journalism). The main doubt is whether the issue of users' compensation can be addressed, as sometimes users don't wish for "recognition" for what they provide, but journalistic coverage of their problems so to be addressed by the government. For example, a very successful radio show in Greece, was built in this logic, where citizens informed the journalists about problems encountered at community level with the aspiration that journalists will look into these problems and make them more visible to the public authorities. So, in case users provide any sort of help to media professionals it should be defined ad hoc among the two parts what is the kind of compensation they wish for.

A second aspect has to do with the copyright issues that arise when citizens work together with professional journalist. We don't have "fair use" in continental European copyright

law, but explicit exceptions and limitations. Those most pertinent to journalism and freedom of speech have been significantly strengthened, i.e. made mandatory, enforceable in court, in the context of sharing platforms in the latest copyright directive (Art 17 Pt 7, Digital Single Market Directive).

(2) Put in place positive algorithmic discrimination of contents

Based on the findings of both WP2 and WP4, we can state that the representation of some topics and figures in social media debate still suffers from prejudices and superficiality, especially at the level of the top-influential posts. On the other hand, a few alternative cases can be observed in the datasets of both major topics - gender and migration – therefore suggesting that there may exist some European ways in how to fight discrimination and stereotypes on social media (see deliverables 4.2, 4.3, and 4.4). Another common best practice is to give social media coverage and generate buzz in support of women's rights and LBGTQ+, as well as to promote empathy and education on gender issues. This may include sharing personal stories to encourage greater understanding and awareness of gender equality. Following the instructions for the country observations of migration, many similarities were found from examples of best practice posts giving voice to immigrants – that is to say, letting immigrants telling their own story. Moreover, stories of individuals, groups, or families - rather than the practice of picturing "immigrants" as a whole - were commonly found across almost all countries. Finally, alternative media activists' projects, which suggest the need of bridging together institutional and bottom-up initiatives, as they raise awareness of the importance and seriousness of the migration issue.

Platformization and its accompanied "democratization" of news and media content has had many negative consequences, most pronounced by the vast creation and spreading of misinformation. However, a more positive view on platformization is provided in this document showing the existence and potential for good practices in fighting discrimination and stereotypes online. At the operational level, further research is needed in order to understand how to valorize users' contribution to the online economy.

The members of the EUMEPLAT project also discussed, and finally ruled out, the option of a similar positive discrimination in favor of legacy media contents in online social platforms, as a remedy to the critical economy viability of news outlets. The first reason for not including this recommendation is the fact that the problem has been tackled by the European Media Freedom Act, which aptly defines a category of 'media service providers' (specifically,

Art 2.2[37]). This self-declared status (Art 17.1) already creates a sort of media privilege, so that platforms cannot remove or block media providers' content because it is incompatible with its terms and conditions unless they send a statement of reasons and give the media provider 24 hours to respond (Art 17.2). Furthermore, the EMFA creates the more detailed category of "media service providers providing news and current affairs content". This is in connection with the obligation of media service providers to report ownership information into a mandatory national media ownership database. And it leads to the obligation of these news providers to guarantee the independence of editorial decisions (Art 6.2).

Secondly, the application of a positive discrimination would be complicated in many ways. In Spain, for instance, the Google tax has been introduced to guarantee intellectual property rights, but its application produced a decrease in traffic to the media, after Google News stopped operating there. This showed, on the one hand, the dependence of the media on external platforms to attract visits and, on the other hand, how wide the margins of action are for the platforms in the face of certain types of measures. This is the same problem we observed while discussing the recommendation (3.4), about how to "Favor the use of European national languages in VOD platforms": while the identification of the problem may be relatively easy, any proposed solution has to be evaluated not only for its intrinsic validity, but for the possible impacts and externalities, and in particular those due to the counter-measures to regulation, as put in place by the major companies. Finally, it is our feeling that privileging legacy media's content on social media platforms would be a critical move, as it might lead to underestimate the role of common users in fueling the online debate, and possibly work against the opening to civil society that we are strongly endorsing (and to some extent, also go against the very logic of the many-to-many communication). In the matter of the relevance of professional reporting, therefore, we refer to recommendation (1.3), Establish a European Journalism Fund.

(4.5) Fine-tune the policy for big data research

Short Recommendation

While the technical proposal for fighting disinformation is delineated in deliverable D1.5, here we will deal with a broader reflection on how to improve the research in the field, by granting access to the data and opening-up the regulatory process to the scientific community. Given the relevance of social media data for scientific knowledge and for the drawing of evidence-based recommendations, we put forward two main needs (see also recommendation 3.2).

1. Social media is a multifaceted landscape. For example, Facebook covers a broader spectrum of the population, while platforms like Twitter and TikTok cater to specific subgroups. Understanding these dynamics is essential for meaningful and representative analyses.

   Social media analyses often rely on large amounts of data, but this data may only represent unrepresentative segments of the population. Sample creation becomes crucial in ensuring that the insights drawn are reflective of diverse perspectives, and that are used properly for developing effective solutions or strategies. We suggest the funding of research programs in that direction, which are necessary to the systematic mapping of polarization, radicalization, and spread of fake news (see also deliverable D5.6- White Book of Recommendations).

2. Moreover, there is a need for the democratization of social media research (Roozenbeek & Zollo, 2022) and its opening to participatory procedures. Indeed, there are challenges associated with the high costs of some studies, limiting independent replication and the involvement of civil society organizations, and often restricting research to well-funded institutions. This collaboration dynamic may compromise independent scrutiny and fair academic competition, particularly in non-WEIRD countries. Additionally, tech companies' unilateral control over data access poses limitations to research questions, as platforms make only a fraction of their material publicly available via official tools such as APIs. We suggest putting to the test the indications contained in Articles 34, 35 and 40 of the DSA, by (1) assessing the impact of the data access granted to researchers on the actual scientific procedures; (2) involve the researchers in an open and participatory debate for the fine-tuning of the above-cited articles and the identification of the blind spots.

Recipient of the Recommendation

European Parliament and European Commission; EU Member States; Turkish Regulatory Bodies; Scientific Community; Social Media Companies

Discussion

The long-standing celebration of the Internet as a great tool for sharing information, disseminating knowledge, and promoting freedom, has more recently given way to a growing

concern for misinformation spreading and polarization phenomena. By fostering communication among individuals and bringing down temporal and spatial barriers, the Internet has revolutionized the information space. This transformation involves the amalgamation of traditional media with a diverse array of news sources, many of which have emerged as alternatives to mainstream outlets. The rise of social media took the information ecosystem to a whole new level, changing the way people engage in public debates and offering a platform for active participation. The increasing popularity of social media platforms rapidly positioned them as the primary source of information for many users. A growing number of individuals now opt to obtain news through social media, search engines, or news aggregators. Moreover, despite the increasing quantity of content, quality may be poor, for issues ranging from content monetization to the persisting reduction of investments in news production and distribution. This situation has played a part in diminishing the reputation and trust associated with traditional media, prompting individuals to turn to alternative information sources, which may not always be adequately qualified. The spreading of unreliable information has the potential to shape public opinion and influence behavior and decisions, raising important concerns about the consequences of misinformation.

A deep understanding of these phenomena requires an interdisciplinary holistic approach that can also leverage the vast amount of data generated by users online. Some challenges and opportunities come with using social (media) data to study information spreading and consumption, including misinformation in all its forms. This data can be used for exploring and analyzing the factors that influence how information is consumed and processed by the public. By monitoring social media, we can gain a real-time understanding of the information available to large segments of the population and their perceptions. When we examine and aggregate this data, we unveil valuable insights and hidden patterns concerning citizens' perspectives. These insights, in turn, can be used to support the development of tailored strategies to contrast phenomena such as misinformation spreading, extreme polarization, and hate speech.

Social media data enable the monitoring of the public's response to societal issues, providing a pulse on the sentiments, concerns, and reactions of the people. Moreover, it helps identify the informational needs of the population, guiding policymakers and communicators on what topics require attention. The data can also drive the development of recommendations to improve the effectiveness of counterstrategies. Crucially, social media data can be a powerful tool in designing and testing effective strategies that anticipate and account for polarization and misinformation-driven reactions from the public. It provides insights into how communities form and interact, shedding light on the dynamics of misinformation spreading and clusters.

Tech companies' control over data of public interest is a recurring issue, which affected the EUMEPLAT tasks as well – for instance, Twitter now only allows pay-access to its API, which risks making the research excessively expensive. While X/Twitter has restricted free access for researchers, Meta selectively decides which projects receive its data. Although

research might maintain independence, Meta dictates the types of inquiries and who can pose them, a scheme Wagner (2023) terms "independence by permission". The EU advocates for platform self-regulation; however, due to pervasive opacity, researchers cannot accurately gauge the predominantly adverse externalities of these platforms. Therefore, we would suggest EU steps in to guarantee free API access to researchers. The TikTok initiative to provide European researchers with access to the social media platform's public data, including content and user profiles, is indicative of the feasibility of this crucial request. Of course, special attention should be paid to a set of criteria to be met by those applying for access: such as academic experience in a non-profit scientific institution or University, serving clearly defined research proposals. These criteria may well apply to a training program for the new generations of researchers in the field.

However, while social media analyses offer valuable insights, it is crucial to acknowledge the challenges that come with their use:

1. Social media is a multifaceted landscape. For example, Facebook covers a broader spectrum of the population, while platforms like Twitter and TikTok cater to specific subgroups. Understanding these dynamics is essential for meaningful and representative analyses. Social media analyses often rely on large amounts of data, but this data may only represent unrepresentative segments of the population. Sample creation becomes crucial in ensuring that the insights drawn are reflective of diverse perspectives, and that are used properly for developing effective solutions or strategies. We suggest the funding of research programs in that direction, which are necessary to the systematic mapping of polarization, radicalization, and spread of fake news (see also deliverable D5.6- White Book of Recommendations).

2. Moreover, there is a need for the democratization of social media research (Roozenbeek & Zollo, 2022) and its opening to participatory procedures. Indeed, there are challenges associated with the high costs of some studies, limiting independent replication and often restricting research to well-funded institutions. This collaboration dynamic may compromise independent scrutiny and fair academic competition, particularly in non-WEIRD countries. Additionally, tech companies' unilateral control over data access poses limitations to research questions, as platforms make only a fraction of their material publicly available via official tools such as APIs. We suggest putting to the test the indications contained in Articles 34, 35 and 40 of the DSA, by (1) assessing the impact of the data access granted to researchers on the actual scientific procedures; (2) involve the researchers in an open and participatory debate for the fine-tuning of the above-cited articles and the identification of the blind spots.

We reckon that there is some awareness of the problem in the EU: for instance, it is addressed by providing data access to vetted researchers in Art 40 of the DSA. More specifically, the FAQs: FAQs: DSA data access for researchers says the same as the final sentence above: before, access to data allowing independent research on systemic risks was based on voluntary initiatives by the platforms, resulting in limited research possibilities for

third parties. The DSA now grants "researchers unprecedented access to the data of very large online platforms and search engines." Purpose is limited to assessing systemic risks (Art 34) and the effectiveness of mitigation measures (Art 35), but these include "negative effects on civic discourse and electoral processes" and "in relation to gender-based violence". What is still to be analyzed, is how this normative has actually benefited research and thereby informed policy and publicly relevant decisions: we therefore call for a consultation with researchers in the field, which might help improving the method and flagging the areas of the public sphere excluded from Art 40 DSA on data access (e.g., newspaper publishers). We also suggest working towards Best Practices and a Code of Conduct, for platforms to give data access to researchers.

In their turn, social media platforms and research centers and seem to identify the same problem, but no recommendation or real solution is proposed. On the side of the funding institution, it may be necessary to issue research calls for mapping the state of the art. Additionally, the social media platforms would probably need to share more data about their users to accurately be able to measure representativity (unless combined with external surveys for example, but this would most likely be unrepresentative and limited in scope and size). Also, specific regulation is necessary: For instance, there are doubts about the limits of web scraping in addition to the ethical issues linked to studies on social media profiles. This adds to the difficulties that the platforms themselves have in being able to track the information. A clear framework of action would be necessary in which the platforms would have to commit to collaborating with scientific studies, especially those that are supported by EU calls.

As to the high costs of the studies, this is a well-known problem, which is difficult to tackle. A solution is to make European research infrastructure available to less wealthy countries, if not to a number of partners outside the EU. Otherwise, an increasing divide will separate well-equipped and less-equipped universities, not to mention the arbitrary role played by social media companies themselves in the process. Yet, amidst these challenges, recent cooperation with Meta has demonstrated the potential benefits of extensive access to user data from social media platforms such as Facebook and Instagram (González-Bailón *et al.*, 2023; Guess *et al.*, 2023a, 2023b; Nyhan *et al.*, 2023). However, this model relies entirely on the willingness of digital platforms to participate, highlighting the need for ethical and transparent collaboration. Future studies are needed to replicate similar work in contexts beyond politics and broaden the geographical scope beyond the U.S. Such expansion is essential for achieving a comprehensive understanding of the phenomena under scrutiny. Frequently, findings from studies confined to specific settings - be it a country, a particular topic, or a specific time period - alongside assumptions and definitions (e.g., the nature of misinformation and how it is measured) are mistakenly generalized as universally applicable to dissimilar settings.

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4   Appendix

The Work-packages notes

The Validation Process

The Work-Packages Notes

Notes from WP1

Author: Daniël Bitereyst (UGent)

1. Related WP	WP1
2. Related Task or deliverable	D1.3
3. Short title of the recommendation	Patterns in Movie Production, Distribution and Consumption
4. Short description of the recommendation: what to do	<u>Preliminary note on deliverable D1.3:</u> This deliverable was produced in 2021 and finalized at the end of that year. It examined long-term patterns in the European movie production, distribution and consumption market for the last three decades. Given this longitudinal perspective and the lack of available data at the time of writing on issues like the impact of the COVID pandemic on the European filmed entertainment industry, very recent trends (which profoundly influenced data on film attendance and other issues) were only partially taken into account. The authors decided to mainly focus upon trends for the period from the early 1990s to 2019. The authors also decided to focus on longitudinal trends in the pan-European production of movies and their distribution and exhibition in film venues rather than including movies' circulation on other screens or platforms. This means that this report didn't monitor and wasn't able to fully grasp the impact of the streaming services which precisely during the COVID pandemic (as the latest 2023 Nostradamus Report stated) resulted into "faster-than-ever evolving audiovisual industries". The focus was on longitudinal trends rather than on analyzing the recent profound impact of the streamers' growing market penetration; of the pandemic's impact on movie production and distribution strategies; and on the impact of these tendencies on audience's changing viewing behavior and consumption patterns. The deliverable was mainly based on data coming from the European Audiovisual Observatory, added by information coming from Media Salles, the International Union of Cinemas, and some other institutions like Europa Cinemas. Although interviews were not required for this deliverable, the authors conducted a series of interviews (see Appendix to the report). Finally, on December 14, 2022, a round table was held in Ghent, Belgium, during one of the EUMEPLAT seminars with representatives from European producers', distributors' and exhibitors' networks (Eurocinema, Europa Distribution, UNIC) talking

	about trends in the European audiovisual media sector. Some of the following recommendations were brought forward during this round table. Recommendations The report, the round table and the interviews resulted into a series of recommendations. D1.3 argues that there is a need for: a) More **research and transparency** on patterns in European movie production; on distribution and flows of movies across and beyond Europe; on audience's use, consumption, perception of European movies; and on industrial strategies, patterns of control, concentration and power. b) **Access to industrial data** on production, flows and consumption of audiovisual fare **from the audiovisual industry**; c) **Continued policy to strengthen and stimulate the production of European content**; d) **Stimulating** more insistently **cross-European film co-productions,** and their **cross-European and global distribution, circulation, and exhibition**; e) **Coordinated cross-European policy** in relation to **investment obligations for streamers and other audiovisual stakeholders** in European audiovisual sector; f) **Strengthening the promotion** of European audiovisual content; g) **Strengthening independent stakeholders**, who stimulate the production and distribution of original European content; h) **Strengthening anti-piracy and copyrights policies** across Europe.
5. Why is it necessary?	a) **Research and transparency.** Given the extremely rapid changes in the audiovisual sector in Europe and the world (including the streaming wars, and changes in audience's behavior across screens and platforms), it is necessary to understand these trends in movie production, circulation or flows, and audiences use and consumption. Some institutions (especially the European Audiovisual Observatory) do excellent work, but they could be strengthened in order to get a better understanding also on issues like audience's behavior and preferences where multimethod research (quantitative, qualitative) could help understanding audience experiences, preferences and behavior across different types of media and leisure practices. b) **Access to industrial data.** Major players in the streaming and other audiovisual business mostly have a protective attitude towards the enormous sets of data they have on production, programming/catalogues, distribution/flows, and audience behavior/consumption of audiovisual fare. If these data could be used on an aggregated level, this could help European policy makers and stakeholders in their strategies to develop a productive policy and strengthen the European audiovisual sector. Inspiration could be found in initiatives like the Euromedia Ownership Monitor (EurOMo) that aims at enhancing transparency of news media ownership and control in European Union countries. EurOMo monitors media ownership transparency by making available a database and producing country reports. A similar initiative for

continued research on ownership is useful in a sector where major global and transnational audiovisual and multimedia actors utilize various strategies to control the (European) market(s). In this context there is a need to adhere to clear definitions of the different types of actors like in the audiovisual sphere with, for instance, a need to clearly define who is an independent producer and to continue to press for adherence to that definition, despite pressure towards economies of scale.

c) **Strengthening production of European content.** In terms of production, the European filmed entertainment industry is characterized by a large and diversified output with films in various formats in both fiction and non-fiction. European film production has also a recognized reputation in terms of its creative strength. However, there are various major problems like the huge fragmentation in terms of different national, regional and local support mechanisms and funding initiatives, often resulting into a huge dependency on public funding, low investment levels, and a volatile production, especially in small countries or language regions.

In this context, a continued policy to strengthen production support, stimulate coproduction, and attract new sources of funding, is needed in order to safeguard the diversity and strength of the creative filmed entertainment industry in Europe. This means that there is a call for a coherent support framework that remains focused on production, but that also aims at harmonization between countries as much as possible and one that can overcome the rat race of member states to offer the most interesting production benefits.

Stakeholders of the European audiovisual industries also argue that in recent years, EU policies very much shifted into the direction of innovation (e.g. on AI), resulting into stakeholders in the audiovisual sector fearing that EU policies might defocus their attention towards movie production, distribution and exhibition.

One of the recurrent issues, expressed by representatives of European movie producers, distributors and exhibitors, in this relation is also that Europe should think about policies enabling the European film industries to (co-)produce, distribute and screen European-made wide-audience movies. Whereas European cinema has a strong tradition in producing excellent movies with small to medium-size budgets, there is a lack of movies with higher to big budgets, capable to attract cross-European audiences. "We need a European Avatar," one stakeholder argues, "in order to compete with Hollywood." The reinforcement of blockbuster strategies within Europe, however, can be a threat to smaller films and their release strategies.

d) **Stimulating cross-European film co-productions**, and their **cross-European and global distribution, circulation and exhibition**. Within the European filmed industry there are huge differences with a handful of major production countries like France, but for most territories one of the key weaknesses of the film sector is that their films are rarely exported and that they often do not travel within and across Europe. Research on movie production and distribution shows that there is a continued problem with the

cross-European flow and global distribution of movies; that US movie and other audiovisual content continue to dominate European screens (in film theaters, streaming and other platforms); and that there are major differences within the European market (e.g. with major countries like France, Germany, Italy, Spain, playing a major role in film coproduction and exports). More could be done to strengthen the cross-European dimension by stimulating coproductions and distribution across major and minor movie markets in Europe. There is a call for a framework that also takes sufficient account of distribution and promotion support and bets on infrastructure premiums for cinema operators, because that window, despite the dominance of streamers, remains incredibly important and according to most figures not depreciated.

e) **Coordinated policy** for **investment obligations.** Although the Audiovisual Media Services Directive (AVMSD Article 13(1)) stimulates member states to think about measures (like quota or a fiscal levy) to ensure that on-demand audiovisual media services provided by media service providers under their jurisdiction promote, where practicable and by appropriate means, the production of and access to European works. In practice, regulations across Europe are quite diverse. More could be done in order to coordinate legislation and streamline policies across Europe in order to strengthen the development of the European audiovisual and media industries. There is a call for a clearer transparency obligation on how quota are respected, how prominence requirements are met, and how streamers spread spending across different countries; as well as reporting on what producer titles have done in their catalogue, especially if supported with public funds (see recommendations a and b). There is, in sum, a call for a clear framework (whether or not negotiated by producer unions or through the revision of the AVMS next time) to return secondary rights to producers when negotiating with streamers on originals

f) **Strengthening promotion of European audiovisual content**. Another recurring problem, linked to the previous recommendation, is that budgets for promoting and advertising films in Europe are often insufficient, especially compared to budgets for Hollywood movies. A policy in this regard would help European content to be more visible for film theater audiences, as well as it would be beneficial for the movies' careers on other screens and platforms.

g) **Strengthening independent stakeholders**. Research on the flow and screening of European movies indicates that smaller independent European distributors and exhibitors (e.g. those linked to the Europa Cinemas network, often linked to art-et-essai, arthouse and community cinemas) mostly perform better in helping European movies to circulate and being shown than major distribution networks and multiplexes. Policies strengthening independent European stakeholders and their cross-European networks could be beneficial for the regional, national and cross-European audiovisual industries.

h) **Strengthening anti-piracy and copyrights policies.** One of the big problems in the audiovisual sector still is piracy, or the illegal acquirement, use, consumption and (often) trade of film content. Fighting piracy and defending

	copyright are crucial for protecting and strengthening the European audiovisual industries.
6. Impact in terms of Europeanization	In a 2014 report on European film in the digital era (2014/2148(INI) for the European Parliament, films are described as "goods that are both cultural and economic and contribute greatly to the European economy in terms of growth and employment while helping shape European identities by reflecting cultural and linguistic diversity, promoting European cultures across borders and facilitating cultural exchange and mutual understanding among citizens, as well as contributing to the formation and development of critical thinking." This deliverable endorses this thesis about the role of cinema and filmed entertainment across different screens as an important part of European societies in terms of their creative industry, economy, social cohesion, the construction of collective identities, and critical thinking and democracy.
7. Possible risks connected to the implementation	Some of the possible risks connected to the implementation were mentioned in §5.
8. Beneficiaries: to whom the recommendations are destined	The beneficiaries are: - European production, distribution, exhibition and other stakeholders, or the European audiovisual industries; - European movie and audiovisual audiences; - Europe as a culturally diversified set of societies.
9. Additional notes [if any]	None.

Notes from WP2

Author: José Moreno (ISCTE-IUL)

1. Related WP	WP2
2. Related Task or deliverable	Task 2.2 Platformization of News in 10 countries
3. Short title of the recommendation	[A] Positively discriminate news media content in algorithmic distribution on social media platforms. [B] Foster discussions about Europe on social media platforms.

	[C] Foster discussions about new social movements, European public sphere and European values on social media platforms by supporting a network of NGOs and grassroots organizations.
4. Short description of the recommendation: what to do	[A] The report on task 2.2 concluded that news media have significant difficulties in gaining levels of reach and attention on social media platforms similar to those obtained by non-news media agents on the same platforms. As a consequence, news media find themselves pressured to fight for attention by engaging in the kinds of more polarizing content that social media platforms' algorithms favor. One way to counter that trend would be to algorithmically favor news media content on those platforms. This could be achieved either by self-regulatory measures by the platforms or by compliance demands imposed by the regulatory authorities. [B] The report on task 2.2 concluded that there was not much discussion about Europe and European issues on the social media platforms monitored. And, also, that references to Europe were not about European issues themselves but rather as a leveraging of European issues for use on internal national political and social struggles. This denounces a lack of real discussion about Europe on social media platforms. That could be reversed with measures to reinforce the discussion of European issues on social media platforms. [C] The report on task 2.2 identified some dimensions of Europeanization that were most addressed on social media, like European Law & Governance, and Political and Economic dimensions. But also some other dimensions that were much less addressed in the discussion about Europe on social media, like European Values, New Social Movements and European Public Sphere. One recommendation to improve the discussions about those dimensions on social media would be to improve and support the cooperation between NGOs and other European grassroots institutions to foster the discussions of those issues in the European Public Sphere. Creating a European cooperation network of such institutions (following the example established by the EDMO European hubs) could stimulate that development.
5. Why is it necessary?	[A] News media and journalism have the social function of providing reliable and balanced information about current events. The fact that, increasingly, news media find themselves fighting with other agents for the attention of users on social media platforms, result either in a degradation of its function or in a reduction of its reach. If we want to keep the information environment on social media platforms to remain healthy and balanced, we need to reinforce the social function of news media on those platforms. [B] The lack (or subsidiarity) of the discussion about Europe and European issues on social media platforms may be a driver for further distancing between European citizens and Europe, in parallel to the polarization and deterioration of its national political discussions. [C] The focus of European discussions on social media on economy, policy and governance threatens framing Europe solely as an "assistential" entity that provides

	assistance or funds when necessity arises. That does not foster a real Europeanity as much as shared values, cooperative new social movements or interchanges in the European Public Sphere.
6. Impact in terms of Europeanization	[A] It's difficult to assess what could be the impact of this kind of measure on Europeanization. One could estimate that fully functioning news media sectors in Europe would prevent polarization and disinformation, thus contributing to a deeper European integration. [B] Measures to foster discussions about Europe and European issues on social media platforms could have a beneficial impact on Europeanization, via the exchange of views on the present and future of Europe. If Europe is absent (or close to absent) from those discussions, Europeanization could suffer. [C] We think the adoption of measures to foster public discussion on Europe on these dimensions would be highly beneficial for the Europeanization process, because it would strengthen bonds between different European actors in dimensions of Europeanization where the discussions about Europe are mainly absent at the moment, as our research for task 2.2 documents.
7. Possible risks connected to the implementation	[A] In the current context, measures destined to algorithmically favor news media on social media platforms could be seen as unfair and arbitrary, thus reinforcing the already bottom-up pressure to distrust the media, the governments and the social and political institutions in general. A related issue would of course be the discussion of what criteria should be used to discriminate between news media and non-news media. [B] Rather than risks, we would stress the difficulty in fostering discussions about Europe on social media platforms in a context which indicates that social media platforms' users do not wish, or show no indicative preference, of engaging in those discussions. [C] No significant foreseeable risks for this recommendation.
8. Beneficiaries: to whom the recommendations are destined	[A] The recommendation of algorithmically favoring news media on social media platforms could be directed at the platforms themselves or at the regulatory authorities. Social media platforms could take the initiative to self-regulate in this manner, reinforcing the algorithmic distribution of news media content on their platforms. Or regulatory authorities, either national or European, could impose on those platforms the compliance with regulatory standards for algorithmic amplification. For example, by imposing regular assessment reports of that amplification, a regulatory method widely used in the DSA and DMA regulatory packages. [B] In spite of the aforementioned difficulty, it would be incumbent on European Union authorities to implement measures destined to foster the discussion about Europe on social media. [C] In the first place, European NGOs and grassroots organizations would benefit from support for a network (in the style of EDMO) that would permit them to share

	experiences and common challenges and foster the discussions about Europe on those topics that are less addressed, according to our data at WP2. From that point of view, it would be incumbent on the European Union to implement those support mechanisms, in order to improve and foster those discussions.
9. Additional notes [if any]	None.

Notes from WP3

Author: Dessislava Boshnakova (NBU)

1. Related WP	WP3
2. Related Task or deliverable	D3.2 and D3.3
3. Short title of the recommendation	30% share of European content in catalogues, but the content is not prominence
4. Short description of the recommendation: what to do	The revised AVMSD extends certain audiovisual rules to video-sharing platforms, including certain 'hybrid' services such as social media, where the provision of videos and programmes is not the principal purpose of the service, but still constitutes an 'essential functionality' thereof. In fact 32% of all films and TV seasons in VOD catalogues are European productions and 21% are of EU27 origin, reveals the new EAO report. Out of the 27,944 European films released in cinemas between 1996 and 2020, some 59% were available on VOD in May 2021.

Our research shows clearly that on VOD platforms people are watching films and TV series produced in the last three years. Now the platforms include European content, but the platforms do not offer options for that content to be find. |
| 5. Why is it necessary? | Our proposal is to keep the 30% European content requirement, but add a requirement that this applies to new European content produced in the last 3 years. And for European content to be available across Europe, so that Europeans can access new European content from other European countries from anywhere in Europe. |

6. Impact in terms of Europeanization	The impact in terms of Europeanization is visible, as in that way European films and series will be available to all Europeans at the same time on the platforms. Currently, European movies and series are available on different platforms and TV channels, which disperses the audience and the platforms do not count them as highly watched and liked, which in turn does not place them among the recommended titles of the platform.
7. Possible risks connected to the implementation	The possible risks associated with the proposal relate mainly to competition in the number of films and series produced in Europe and USA. But co-production conditions can be applied here, which will make it possible to have new European films and series on the platforms.
8. Beneficiaries: to whom the recommendations are destined	EU Commission - policies related to Audiovisual and Media Services
9. Additional notes [if any]	For example in Bulgaria we watched in 2022 the the Danish TV series - The Killing, produced in 2007
10. Bibliography	1. Guidelines on the revised Audiovisual Media Services Directive – Questions and Answers, *https://ec.europa.eu/commission/presscorner/detail/el/QANDA_20_1208* 2. 32% of all films and TV seasons in VoD catalogues are European productions and 21% are of EU27 origin, reveals the new EAO report, *https://cineuropa.org/en/newsdetail/440501/* 3. European films on VOD in numbers, *https://www.digitaltveurope.com/2022/04/12/european-films-on-vod-in-numbers/*

Notes from WP3

Author: Dessislava Boshnakova (NBU)

1. Related WP	WP3
2. Related Task or deliverable	D3.2 and D3.3

3. Short title of the recommendation	National language is as important as English, but is not available in most of the platforms
4. Short description of the recommendation: what to do	In most of the cases the audience prefer to watch movies and TV series on its national language. When that is not possible in most of the cases the audience choose English, but not as subtitles, but as the main language of the film/TV series. That put all European movies, which are not in English or at the National language of the audience in risk, not to be preferred by the audience. If the AVMSD include the obligation to include National language to all European movies/TV series that will make those movies and TV series more accessible to European audiences.
5. Why is it necessary?	According to data analysis during WP3 of EUMEPLAT project, we find that the Average % of National Language per movies on platforms such Netflix, Disney+, HBO, iTunes, Amazon Prime and Google play varies between 4,8 and 15,66. At the same time the average % of National Language per TV series is between 2,5 and 9,8%.
6. Impact in terms of Europeanization	One of the biggest problems and at the same time one of the biggest assets of Europe are languages. When we narrow the choice of Europeans only between National language and English, we do not work for the Europeanization. Our research clearly shows that language is one of the main factors in the choice of movies or TV series. At the same time if we find a way to make European movies and TV series more popular between Europeans that will help to know better each other and to have the desire to travel and know Europe better.
7. Possible risks connected to the implementation	Certainly, translating movies and TV series is not the activity in which the platforms want to invest funds. This can make the translations not good enough and confuse the audience. Platforms may not accept this requirement and refuse to translate the production into the national language of the respective country with the justification that the content is available in English.
8. Beneficiaries: to whom the recommendations are destined	EU Commission - policies related to Audiovisual and Media Services
9. Additional notes [if any]	In 21 century there are many ways to translate a video content. One of them is the Open Translation project of the conference TED, at which volunteers translate and put subtitles to many talks and videos. Their experience clearly shows that regardless of the availability of content in English, views increase dramatically after a lecture is translated into another language.
10. Bibliography	TED Translators - *https://www.ted.com/participate/translate*

Notes from WP3

Author: Dessislava Boshnakova (NBU)

1. Related WP	WP3
2. Related Task or deliverable	D3.2 and D3.3
3. Short title of the recommendation	Promotion is very important for attracting audiences for movies and TV Series
4. Short description of the recommendation: what to do	As platforms are global and their main goal is the global audience, they invest in promoting USA productions and coproductions or their own productions. They do not have the duty to promote European productions. At the same time the promotion of EU movies and TV series is not as prominent, aggressive and omnipresent as the one of USA productions. The responsibility to promote a production is to the producers. Our proposal is to open more opportunities for supporting promotion of Eu content. At the same time an initiative for cooperation between European communication agencies and European movie and TV series producers will results in better promotion of European content.
5. Why is it necessary?	Many movies, series, platforms and games are competing for the audience's attention. The user has limited time to gather information and very often chooses what others have chosen without taking the time to explore new titles. And if we do not hear or come across an advertisement of European productions, we simply choose the most popular and the best advertised.
6. Impact in terms of Europeanization	In an initiative to stimulate the promotion of European films and series, in addition to European advertising agencies, students in European universities in marketing, advertising and communication can be involved. This will certainly make European content more visible, but it will also create contacts between the different players in the media market, which sooner or later will lead to new products and projects.
7. Possible risks connected to the implementation	There is a risk that European producers will not recognize an initiative to promote their product if it does not guarantee them the right to decide how and in what way their product is promoted.

8. Beneficiaries: to whom the recommendations are destined	EU Commission - policies related to Audiovisual and Media Services
9. Additional notes [if any]	The European Universities will benefit from cooperation with movies and TV producers as students will have the opportunity to work on real cases. We have the example of BioBased Industries Consortium during their project funded by Horizon 2020
10. Bibliography	Guide of best practices for cooperation between academia and industry based on success cases *https://www.bioeconomy-library.eu/wp-content/uploads/2020/05/Guide_of_Best_Practices.pdf*

Notes from WP3

Author: Dessislava Boshnakova (NBU)

1. Related WP	WP3
2. Related Task or deliverable	D3.2 and D3.3
3. Short title of the recommendation	PSM must enter the world of platformization if they want not to lose the young audience
4. Short description of the recommendation: what to do	Public service media (PSM) benefit society in many different ways from the positive impact they have on culture, education and democracy to their impact on the technological and the economic life of nations. Many representatives of the new generation get all their information online. The platform became familiar standard for getting news. If we want to secure the place of PSM they have to make steps to platformization of their content. There are good examples, but not all PSM are on their way to platformization at the moment.
5. Why is it necessary?	According to data 72% of internet users in the EU now get their news online. More people are accessing news via social media than through news websites. At the same time the interest in news has fallen sharply around the world, from 63% in 2017 to 51% in 2022. If we want to win the battle with fake news and disinformation we need to make PSM content accessible online for all Europeans, which means to encourage PSM to digitalised their content and to make it accessible to the users.

6. Impact in terms of Europeanization	If PSM became platforms we have a better chance to get the attention of new generations and talking to them where they are, when they want and on topics they are interested in. On the other hand, this way the content of the European media will be accessible to all, especially if efforts are made to translate it into different languages. Using new technologies, making already digitized content accessible to people who speak another language is a task we can handle. This will ensure access to authentic information about what is happening in the various countries in Europe.
7. Possible risks connected to the implementation	The risk in this proposal is mainly related to the slow pace at which the public media enter the new communication realities. The risk is that they are platformed too late, when users have already developed habits of receiving information from other sources, and not all of these sources are reliable and offer credible information.
8. Beneficiaries: to whom the recommendations are destined	EU Commission - policies related to Audiovisual and Media Services
9. Additional notes [if any]	In Bulgaria for example there is a podcast, in which the hosts present the most important news from the day in less than 8 minutes, every weekday before 5:00 p.m. That is the way new generation get news. And we have to answer their needs.
10. Bibliography	https://www.den.fm/

Notes from WP3

Author: Dessislava Boshnakova (NBU)

1. Related WP	WP3
2. Related Task or deliverable	D3.2 and D3.3
3. Short title of the recommendation	Europe have to encourage Europeans to create European related content on VSP

4. Short description of the recommendation: what to do	According to data Google is the preferred platform by **38.04%** of users in Europe, Facebook is preferred by **30.55%**. Apart from this, European users also prefer relying on other social media platforms, including Twitter (now X) and Instagram, for authentication purposes. We need to encourage all users, who generate content online to be more ready to connect themselves with Europe and European topics. There are campaigns in this direction - for example tour Europe by train, but these campaigns are not visible enough on social media, when searching for the keyword Europe. Working with young European for creating more content related to Europe will create a better presence of Europa in VSP.
5. Why is it necessary?	New generations use VSP for authentication purposes. We think that Europe should be a significant part of their authentication online and offline. That will help creating sense of belonging to Europe, as part of belonging to other community by interests.
6. Impact in terms of Europeanization	If we want to create sense of belonging to Europe, we have to start by stimulating the authentication as European.
7. Possible risks connected to the implementation	In order to avoid the risks that the identification with Europe is apparently deliberate and inauthentic, the process of identification with Europe should be part of programs - like travel by train in Europe, but in these programs put more serious emphasis on generating content with tag Europe in VSP platforms.
8. Beneficiaries: to whom the recommendations are destined	EU Commission - policies related to Audiovisual and Media Services
9. Additional notes [if any]	At the moment of writing of these recommendations the hashtag #bytrainineurope has only 5 posts on Instagram. Investing in programs to stimulate the use of popular hashtags and other social tools for promoting Europe through user generated content will only create a better image of Europe.
10. Bibliography	Europeans 'Social Media Habits: Findings from LoginRadius 'Identity Report 2023 - *https://medium.com/@loginradius/europeans-social-media-habits-findings-from-loginradius-identity-report-2023-140c4ba27123*

Notes from WP4

Author: Jim Ingebretsen Carlson & Francisco Lupiáñez-Villanueva (UOC)

1. Related WP	WP4
2. Related Task or deliverable	D4.5
3. Which is the single most relevant proposal for institutions, regulators, or civil society at large?	There exists ample opportunities for institutions and civil society to promote and create social media content that fights discrimination and stereotypes in online environments with the potential for impact across several European countries. This may in turn, contribute to a Europeanisation process, and a common European way, in how to fight discrimination and stereotypes on social media in Europe. While being accompanied by numerous bad practices, such as fake news, hate speech, and so on, the work in Deliverable 4.5 Catalogue of Best Practices shows that platformization also provides the opportunity to communicate, spread and promote good practices to fight stereotypes and discrimination on social media and in online environments in general. While exhibiting quite some heterogeneity, the cross-country study of 10 European countries shows that there indeed exist some commonalities in the types of best practices that are communicated in social media across Europe. While the specific content of the posts naturally differs between countries, some general themes emerge that are more common across different European countries. In this sense, one can find hints of Europeanisation, or a common way, in what organisations and individuals find important to communicate to fight discrimination and stereotypes online. With this being said, substantial heterogeneity is also found across the countries. Therefore, parallel country-specific strategies may be needed to maximize the impact of the promoted best practices. The Catalogue of best practices provides quantitative analysis, aiming at locating best practice posts, as well as examples of best practices across 10 European countries. A first observation is that there exist quite a lot of heterogeneity across the 10 European countries in the quantitative results and best practices. This provides a rich picture of the possibilities across Europe, but at the same time indicates that the process of Europeanisation has not reached far in this area. Based on these results, institutions and civil society can play a major role in igniting a process of Europeanisation in this respect by promoting pan-European best practices for fighting stereotypes and discrimination. Given that there currently seem to be a low level of similarity among the European countries, such a strategy has potential for major impact in constructing a European way of how to fight discrimination and stereotypes online. The quantitative analysis is conducted by using relevant keywords with the aim of finding posts that are best practices for fighting discrimination and stereotypes. Consequently, the provided keywords can be used to locate best practice posts to be promoted. The keywords from the different partners from one of each of the 10 European countries represented in the EUMEPLAT consortium are different in general. This, together with the country-specific differences, show that the occurrence of best practice posts varies substantially across the European countries for both topics. Additionally, for the topic of migration there is a lot of variation among the counties in whether the best practice posts mostly concern discussions about Europe or not.

	However, for the topic of gender the best practice posts are more common in discussions about Europe for all countries. This commonality could indicate some degree of Europeanisation in the content of the best practice posts as they are often on a European level.

However, numerous similarities are found when analysing the examples of best practices provided by the partners of the project. There are several similarities when it comes to the themes of the posts within each of the topics of gender and migration, suggesting that there may exist some European ways in how to fight discrimination and stereotypes on social media. Some similarities for gender are country observations concerned with the representation of social movements on social media to support gender to promote awareness, empathy and social change. Another common best practice is to give social media coverage and generate buzz in support of women's rights and LBGTQ+ as well as to promote empathy and education on gender issues. This may include sharing personal stories to encourage greater understanding and awareness of gender equality. Following the instructions for the country observations of migration, many similarities were found from examples of best practice posts giving voice to immigrants – letting immigrants telling their own story. Moreover, stories of individuals, groups, or families, rather than picturing "immigrants" as a whole were commonly found across almost all countries. Finally, alternative media activists' projects, which suggest the need of bridging together institutional and bottom-up initiatives, as they raise awareness of the importance and seriousness of the migration issue.

Platformization and its accompanied "democratization" of news and media content has had many negative consequences, most pronounced by the vast creation and spreading of misinformation. However, a more positive view on platformization is provided in this document showing the existence and potential for good practices in fighting discrimination and stereotypes online. While the work of limiting the negative consequences is very important, such as by fighting fake news, there exists potential for institutions and civil society in also promoting and creating posts that are good practices to make them more salient and visual to the consumers of social media. |
| 4. Additional notes [if any] | The appendix of Deliverable 4.5 Catalogue of best practices contains keywords that can be used to locate posts that are best practices. These posts can in turn be promoted in individual countries and across Europe. |

Notes from WP5

Author: Vaia Doudaki (CU)

In terms of back-casting, which is the most dangerous tendency you have detected, and how you would deal with it?

The analysis of the future scenarios pertaining to surveillance/resistance in Europe highlighted some dystopic visions imagining Europe as becoming more authoritarian, giving up some of its democratic freedoms and values. Within such a dystopic future, securitization and nationalism will prevail, and conflicts and antagonisms in international relations will become the norm. Europe/EU and the individual European nation states will be functioning as surveillant assemblages, and will be subjecting their citizens to enhanced forms of surveillance in conditions of shrinking rights and freedoms, and of shrinking democracy.

Such dystopic visions tend to be connected to low levels of trust or complete distrust towards the state, the EU or particular institutions. Literature suggests that low levels of political or institutional trust may be related to high citizen engagement and involvement in democratic governance (see, e.g., Hall, 2021; Kaase, 1999; Verde Garrido, 2021). At the same time, there are increasing indications in Europe of enhanced general distrust towards the states and major institutions, including the media, science, education and contemporary forms of liberal democracy, which sometimes take a full-scale antisystemic character and are related to increased radicalisation (French & Monahan, 2020; Marwick & Lewis, 2017).

Among these trends, the signs of increased radicalization and questioning of the relevance of liberal democracy are quite troublesome. One broad field of action, to prevent the dystopic visions of an increasingly intolerant and authoritarian Europe, concerns education. A reconfiguration of formal and lifelong education, bringing to the core the concept and practice of a critical citizen pedagogy, could be a contribution in this direction.

This type of education could involve the formal obligation in primary and secondary education for the inclusion in the curricula of a critical pedagogy of the citizen, adjusted to the level of education. It could concern either the introduction of specialized and dedicated courses and activities or the redesigning of existing courses to bring in the spirit and practice of citizenship and democracy. Also, in tertiary education, the study programmes may include a range of elective courses – theoretical, practice-based or apprenticeships– that involve competences of active citizenship, designed to serve the needs and requirements of their fields of study. The formal inclusion of citizenship education to programmes of study may be connected to the evaluation and accreditation of these programmes, but also to the education and training of teachers and professors.

According to the latest Eurydice report on citizenship education in Europe (European Commission, 2018), the following competence areas (i.e., areas of knowledge, skills and attitudes) need to be included in citizenship education:

- "Interacting effectively and constructively with others, including personal development (self-confidence, personal responsibility and empathy); communicating and listening; and cooperating with others.

- Thinking critically, including reasoning and analysis, media literacy, knowledge and discovery, and use of sources.

- Acting in a socially responsible manner, including respect for the principle of justice and human rights; respect for other human beings, for other cultures and other religions; developing a sense of belonging; and understanding issues relating to the environment and sustainability.

- <u>Acting democratically</u>, including respect for democratic principles; knowledge and understanding of political processes, institutions and organisations; and knowledge and understanding of fundamental social and political concepts" (p. 6).[38]

While, based on the Eurydice reports (2012, 2018), there are some courses or activities concerning citizen education in all European countries, not all countries' primary or secondary education curricula include all the above-mentioned competence areas in their related educations. What is more important, is how these competences are apprehended and taught, and what kind of methods and activities are included for their training. A more careful examination of what is included in citizenship education in the different European countries shows that such an education tends to engage in narrow approaches as to what constitutes citizenship, being often fragmented, incomplete, nation-centric and outdated. The main issue is that inclusive and critical approaches to citizenship that reflect the conditions, needs and challenges of contemporary societies, bringing to the core the aspects of democracy and social justice, are largely missing.

Critical pedagogies of citizenship would need to engage pupils and students in practicing their rights, responsibilities and roles as citizens, in the environments in which they are active, that is, in the classroom, at school, in the neighbourhood, in their extracurricular activities. This would involve, for instance, leaving space to pupils/students to co-design some of the courses/ activities and take responsibility for them, engaging pupils/students in managing the classroom and in being more substantially involved in school governance.

Curricula of critical citizenship would need to treat pupils and students as young citizens, encompassing enhanced democracy in practice through increased levels of participation in decision-making, implementation and power-sharing that cultivate critical engagement, responsibility, tolerance and respect for difference. This would imply that pupils/students need to engage in activities outside the classroom, that take place in (controlled) social settings (always adjusted to the ages of pupils/students and/or the level of education).

The elaboration of critical thinking competences is beyond the scope of this brief note of recommendations but it can still be mentioned that it is important to integrate and enhance critical thinking and participation in all curricula as part of a critical citizenship education. As it concerns the competences concerning media/digital literacy, the latter needs to be connected to citizen literacy, in ways that pupils/students develop the knowledge and skills to comprehend and manage information and

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38 In an older report by Eurydice (2012) this competence area was covered by "civic-related skills" which were described as "participating in society through, for example, volunteering, and influencing public policy through voting and petitioning" (p. 32).

communication environments in ways that enable them to decide responsibly and control their lives as social beings.

The contemporary social, cultural, political and economic challenges Europe is facing point to the need for a reconfiguration of the European educational programmes, integrating the principles and practice of critical citizenship. If democracy is not practiced by its subjects -the citizens- in all spheres of social life and is restricted for the majority of citizens to the formal obligation to participate in elections, it becomes easier for its relevance to be questioned, in conditions of increased uncertainty and economic difficulty experienced by large parts of the population. An education that caters for citizens who are critical towards authority, power and social injustice, and who take responsibility by participating themselves in processes of co-decision and power-sharing, may be a counter-force preventing dystopic futures of less democratic and more authoritarian societies.

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Notes from WP5

Author: Miloš Hroch (CU)

The essay on best practices focuses on scenarios on one of the five pre-given themes, namely algorithms and choices. In the Delphi+ workshops, each subgroup of participants was asked to produce

three future scenarios, resulting in 37 scenarios (see *Table 1*). These scenarios were documented in scenario cards, transcriptions of Delphi+ workshops, and future scenario essays written by EUMEPLAT researchers.

Delphi+ workshop location	Number of scenarios
Sofia	6
Malmö	9
Rome	7
Sofia 2	8
Essay	7
n	37

Table1

In our case, future scenarios – and algorithmic imaginary (Schulz, 2023) of the experts who participated in the Delphi+ workshops (REF) – were centered around four types of actors (platform users, platform corporations, algorithms and institutions. The last two actors were the most frequent; scenarios related to algorithms and institutions also had clear European dimensions.

In this essay, we will choose one scenario per each of these two actors. To explore these desirable scenarios, we used a backcasting method, one of the future research methods. Backcasting is usually applied to complex and long-term issues and concerns the need for change. As a method, it was defined by Robinson (1982) as "explicitly normative, involving 'working backwards' from a particular future end-point to the present to determine what policy measures would be required to reach that future" (p. 337).

Type of actor	Frequency (N=37)	European dimension
Algorithms	15	2
Platform users	5	1
Platform corporations	7	4
Institutions	10	9

Table 2

Backcasting is used to "explore future uncertainties, create opportunities, build capabilities, and improve decision-making processes" (Bibri & Krogstie, 2019, p. 5). Backcasting is opposed to forecasting, and the difference is described (Robinson, 1982, p. 337): "The major difference is that backcasts are not intended to indicate what the future will likely be, but to indicate the relative implications of different policy goals."

As a method, it works from a description of the desired future backwards to evaluate the steps needed to realize that scenario. Scenarios are – as Robinson (1988) advises – supposed to be "evaluated in terms of its physical and socioeconomic feasibility. Iteration of the scenario is usually required to resolve tensions or physical inconsistencies and to mitigate adverse economic, social, and environmental impacts that are revealed during the analysis" (Robinson, 1988, p. 334). Lein adds (2017, pp. 81-82) that a successful application of backcasting should involve identifying desired end points to achieve, the obstacles, opportunities and milestones in the process ("including the steps and setbacks from the desired end to the present"), and policy requirements, and strategies "that define the main sequence action should follow to connect the present with that future" (p. 82).

European Justice League of (Algorithm Literacy)

The need for improvement/increase in *algorithm literacy* and education was repeatedly mentioned in future scenarios. One scenario titled "EU Justice League of Literacy" (Scenario Card 11) accentuated the need for international cooperation in an educational organization powered by all EU member states.

The scenario imagines a future where algorithm literacy in European society is high, accessible as the basic needs, and algorithm literacy is coordinated on the trans-national level by a separate organization called the European Justice League of Literacy. Algorithm literacy was described as "understanding what this technology is doing and how it is taking away your choice or providing you a choice of not really providing you a choice" (Delphi+ Participant 5). The organization's goal would be "an independent spaceship approach that finds an easy way to explain to people what algorithms are doing to their lives and what that makes to their choice".

One of the main obstacles, seen from the present perspective, is EU member states' national jurisdictions and educational systems. Establishing such a governmental body would mean the transfer of powers from the national and regional level to the supranational-EU level – it would allow the "European Justice League of Literacy" to surpass the individual education systems in each country. "European Union is built on money and trade; you do not have such complement in education and culture (Delphi+ participant 5)." In this scenario, the present EU legislation is framed as constraining. It would also mean a change in EU priorities:

> European Union is built on trade. It doesn't have any complements in education or culture. You need to create some kind of education that allows that super house to communicate to the people directly and not go through every single different educational system of every country in the world. Because I think the only way, we can keep the choice is to be aware of what is being done to the choice (Delphi+ 5 Participant).

To sum the steps that need to be taken to achieve this scenario:

1. EU needs to balance or change its priorities (education first);

2. The common EU strategy for algorithm literacy needs to be created;

3. This strategy will be implemented by the supranational educational body European Justice League of Literacy, which will be above the educational systems of EU member states.

Algossistance

One scenario essay, "Algossistance, "imagined the EU as a tech utopia by the 2050s, which would be the desired future. EU will become competitive with China and active its industrial and economic potential, as it will be the first in the world to allow the implementation of microchips in the human body. It imagines the entanglement of algorithms and humans in a very transhumanistic or neuro-futuristic way. "Algossistance" can be installed into the human body as a microchip helping with everyday decision-making. For instance, buying ice-cream and "activating algossistance via the power of thought" (Scenario essay 1).

The opportunities, as this scenario predicts, are in leaving the human-centric perspective towards technologies and being open to algorithms' possibilities. One key milestone in this scenario is that European Commission needs to approve implanting these algossistance microchips into human bodies (according to this scenario, it will happen in 2042). EU saw it as an economic opportunity for stimulating capitalism:

> Europe could re-establish itself as a cutting-edge technological utopia that acts ahead of its global competitors. And it resonated well with the European tradition of public-private partnerships as the algossistance microchip was developed by ALGINO, a company jointly funded by the European Union and private capital—a global business monopoly holding the key to future prosperity (Scenario essay 1).

To sum up, the steps that need to be taken to achieve this scenario:

1. The EU needs to change its stance towards algorithms and AI technologies, for instance, use the opportunity created by the regulation of global platforms to develop its own AI industry;

2. Approve implementation of microchips that allow the installation of algorithms into human bodies;

3. Create a public-private partnership to establish a global business monopoly in a company jointly funded by EU and private capital.

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Notes from WP5

Author: Mehmet Ali Üzelgün (ISCTE-IUL)

The TF 5.3 on Toxic Debate and Pluralistic Values has systematically studied the prescriptive discourse in the future scenarios (N=41) and identified two salient recommendations as well as three underlying myths (Inayatullah, 2012). As they provide a summary of the scenarios produced on the theme, I will first outline the three myths underlying the scenarios and then discuss some recommendations addressing the communicative predicaments associated with the theme.

The first myth can be called technological disruption, or more specifically, algorithmic and AI disruption. It basically depicts a society that cannot keep up with the pace of technological innovation, underlying the descriptions of a brave new world where the integration of digital technologies into all aspects of human communication poses numerous challenges that the public cannot even fully comprehend. This myth may be seen to reflect the recent debates built around the rise of generative AI and algorithms at large, and portrays these as villains, or as the cause of the problems that the second myth underlies.

The second myth can be called the fragmentation of society. It constitutes the central axis of the dystopian outlook and depicts nothing short of a total breakdown of communicative commons and frameworks. Several cascading factors are aligned in this outlook: lack of multidimensional communication and facework, bubbles, fake news, hate speech, polarization, blurring boundaries of the real and virtual, and the complete loss of the sight of truth. This myth depicts a society that can no longer address issues of common concern in a reasonable manner but just score influencer points and highlights of identity politics. Fragmentation of society is the central myth in the sense that the two other underlying myths are connected to it: the first one represents its causes or the main factors in bringing it about, and the second one represents the efforts to address it.

The third myth can be called Enlightenment 2.0 and it represents the efforts and measures that may address the issues cascading over the background of toxic debates and culminating into the fragmentation of society. This myth underlies the reparative and prescriptive discourse unfolding in the scenarios. It is connected to Europe more directly than the others to the extent that it could be called European Enlightenment 2.0. It's two core manifestations are discussed below as "educate" and "regulate". In terms of back-casting, the most dangerous tendency detected is polarization. Polarization is however directly connected to other phenomena and issues, and owing to factors such as bubbles, fake news, hate speech, identity politics, and blurring boundaries of the real and virtual, is regarded as gradually deteriorating. Notably, the ultimate peril in this digitally-mediated gradual decline is the complete loss of the sight of truth and reasonable communication. This tendency is directly connected to the central myth of fragmentation of society, meaning, without adequate measures, polarization exacerbated by platformed communication may lead to more severe challenges such as physical violence and war. For a more complete picture around polarization, the three myths mentioned just above function as a contextualizing background.

How to deal with polarization and other dynamics interwoven around it? The two central messages emerging from the scenarios are "educate" and "regulate". Between the two, education was certainly the more salient one, with specific recommendations as follows: encouraging critical thinking and digital literacy, supporting public access to and acquisition of algorithm knowledge, encouraging responsible digital citizenship, encouraging participation and innovation in activism, democratisation knowledge

worldwide, development of critical thinking for evaluating online content, and encouraging empathy and respectful online interactions. Notice that all these are top-down measures, as almost no agency is ascribed to individual users in the process of overcoming the polarizing predicament. This is in line with the calls to "regulate", which were mainly measures to control and restrain the corporate power reigning in social media platforms and digital communication at large. These include interventions in business models to align them with democratic principles, and innovations both in public media and civil society for a more well-established context for debate. Europe, both as a culture and a powerful institution, has been associated with both (digital) literacy and (public media) regulation recommendations.

Additional notes. I'd like to add to the recommendations on digital literacy with a slightly different and more structural recommendation. Although bottom-up approaches yield more thorough and enduring and solutions, innovative structural proposals may in some cases serve as a game-changer.

Therefore, experimentation in design of the interaction on platforms – with the hope to come up with game-changing innovations – can be a front into which we may recommend putting more effort. What does it mean to focus on the design of the interaction (or debate) on platformed media? An example can be illustrative. This specific recommendation builds on the idea that, not just the whole design, but also the starting points (van Eemeren and Houtlosser, 2006) and positions (Greco, 2023) of a particular discussion are consequential. Starting points – or original posts in general – thus may be distinguished in accordance with where they come from: debates initiated by trusted civil society organisations such as the Amnesty International, Corporate Watch, and World Health Organisation may have a different status than a debate initiated by a personal account. The rationale in distinguishing the personal and institutional accounts is that the institutions have a certain conduct that is monitored by their membership and audience, and they have a peculiar accountability that individual users don't have.

A major problem in public debate today regards the authority behind establishing trustworthy and solid starting points. This is not merely a problem of post-truth or erosion of the authority of science (to establish solid starting points), it is primarily a lack of means of how and with what relevance we bring up a piece of information (in the context of other pieces that may be conflicting). Civil society actors, advocacy groups and trusted institutions can be granted with some special status on an experimental platform that may radically change how online discussions unfold. Again, this is just an illustrative example of how innovations – not technological but institutional/legal – can change the shape of online debates. In short, more effort can be placed on debate design measures, rather than technological control and containment of toxic exchanges.

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Notes from WP5

Author: Nico Carpentier (CU)

Introduction

Task Force Four (TF4) of the EUMEPLAT's fifth Work Package is concerned with the role of "destructive technologies and war" in the context of platformization and Europeanization. Apart from providing a theoretical reflection about the relationship between conflict— defined in a broad sense, including armed conflict, grey zone conflict and democratic conflict—and communication platforms, and re-analyzing the outcomes of the previous EUMEPLAT Work Packages, TF4 was responsible for a future scenario analysis on this particular topic. These three components were published in the Deliverable 5.4, entitled "Conflict and Communication Platforms" (Carpentier, Miconi and Andersson, 2023).

The future scenario development made use of the Delphi method, which is a method for forecasting and future scenario-building with a long history. Landeta (2006: 468) defines this method as "a method of structuring communication between a group of people who can provide valuable contributions to resolve a complex problem." As Gordon (2009: 4) summarizes it, the Delphi method is grounded in a "controlled debate" which allows for the establishment of consensus among experts, through a series of iterations. This method is part of the future studies tradition which has evolved from "from predicting the future to mapping alternative futures to shaping desired futures" (Inayatullah, 2012: 37), which is also why the Delphi method was used in this project for scenario-building, and not forecasting.

In our case, we adjusted the Delphi method into a 3-and-a-half-hour, face-to-face and two- stage scenario-building workshop (see Carpentier, Miconi and Andersson, 2023 and Carpentier and Hroch, 2023 for more details), which focussed on five pre-given themes (including destructive technologies and war). Four workshops were organised in three different European cities, with in total 29 participants. As a method, these adjusted (and -me-compressed) workshops approximate what Pan et al. (1996) called a mini-Delphi, although we preferred to label these four workshops 'Delphi+' workshops. These were complemented by four scenario essays, written by TF4 team members. All scenarios were written before the data analysis, as part of a EUMEPLAT future scenario writing project, which allowed to enrich and diversify the future scenarios, adding an auto-ethnographic dimension (Ellis, Adams and Bochner, 2010) to the data gathering process.

The analysis of these scenarios resulted in the identification of six types of scenarios, which were structured on a benevolence/malevolence axis. Four scenario types were more negative: (1) the power take-over, where a particular field of the social was predicted to centralize power; (2) the intensification of armed conflict (with some references to grey war conflicts that approximate armed conflict); (3) the intensification of democratic conflict; and (4) the harm inflicted on environment and society. The two more positive scenarios were: (1) the protective role of supranational organizations; (2) cultural change processes strengthening (the discursive components of) agonization. One remarkable conclusion of this future scenario analysis was that the more positive scenarios were vaguer, and less detailed when it concerned the elaboration of more concrete and practical mechanisms to strengthen agonis-c cultures (and, in other words, peace). Here, we concluded that the imagination of the Delphi+ workshop participants and the essay-writers par-ally failed them, which suggests that there is a need to render these mechanisms more known and visible, in order to contribute to the avoidance of the malevolent scenarios, and to allow for the translation of the benevolent scenarios into the world of the future.

This conclusion fed into the next phase in our analysis, which is the back-casting phase. Back- casting is a future studies method—according to Dreborg (1996: 814; 827) developed by Amory Lovins (1976) and John Robinson (1982)—which is concerned "not with what futures are likely to happen, but with how desirable futures can be obtained." (Robinson, 1990: 822) This implies a reflection about the development of a series of pathways to "reflect solutions to a specified societal problem" (Dreborg, 1996: 816), which has been identified as part of a potential future.

In our case, the argument is that the intensification of antagonistic conflict—or in other words, the antagonization of society—poses an undesirable future. This has a multiplicity of causes and potential solutions, but as communication platforms have the potential to contribute to the antagonization of society, but also to its agonization, strategies can be developed to strengthen the later. In particular, as there seems to be limited knowledge about these agonization strategies with the Delphi+ workshop participants—who are considered to be experts—we argue that this knowledge production and transfer needs further stimulation.

In particular, two (ambitious) strategies are proposed:

1/The development of an over-arching **Participatory Production Ethics,** which will group the already-existing but fragmented initiatives in a variety of societal domains (e.g., the initiatives against cyber-bullying). As this is a substantial social change project, requiring citizen/platform user involvement, and a participatory bottom-up approach is unavoidable, a roadmap for stakeholder involvement will need to be created, in order to set up a large- scale, expert-supported, participatory process, making use of (by now accepted) methods for citizen participation such as citizen assemblies. In a next stage, educational processes—at both formal and informal levels (ranging from the educational system to communication platforms)—need to be organized to mainstream (or hegemonize) these Participatory Production Ethics.

2/The **Aggregation of Media and Informa-on Literacy** (MIL) and **Peace Education** (including peace building / conflict transformation approaches), which implies cross-fertilizing the existing efforts in relationship to both formal/informal educational fields. Arguably, there still exists a knowledge gap in how these two fields intersect, which necessitates the creation of or more centers of expertise at a European level, and impulse funding for additional research. Moreover, the amply existing expertise in both fields should be stimulated to engage in dialogues with each other, resulting also in more practical outcomes—at a European level—such as the identification and stimulation of best/good practices of this aggregation, the exchange of teaching experiences on this aggregation and the development of course models (and course ware) with this aggregation, at different educational levels.

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Notes from WP5

Author: Sofie Van Bauwel (UGent)

1. Related WP	WP5
2. Related Task or deliverable	Task 5.5 Gender in Society
3. In terms of back-casting, which is the most dangerous tendency you have detected, and how you would deal with it?	The future scenarios in relation to gender and society covered three different themes. The first two themes are about experiences of individuals, whereas the last theme is about collectivity. The first theme covers topics about the feelings and experiences of gender. Scenarios under this theme talk about the changes of gender over time and space. Some of them mention how gender identities and our perception of them can change over time and can be different depending on the space we look at. Others illustrate that people their gender identities can fluctuate over their lifetime. Gender is something fluid. Whereas society often wants people to be completely certain about one's gender identity, uncertainty in relation to gender is not uncommon because of gender's fluidity and changes. Under the second theme we have scenarios that in different ways talk about doing gender. They are about the embodiment of gender.

They talk about what representing one's gender and gender identities can look like. Moreover, some of these scenarios also mention the embodiment of gender in relation to believability. Lastly, the third theme is about gender in relation to collectivity. Scenarios that fall under this theme are about activism in relation to equal opportunities and gender rights. They illustrate possible futures with(out) resilience towards gender inequality and with(out) solidarity for victims of gender issues. Importantly, most but not all of the scenarios under the three themes bring these topics in relation to social media.

When looking at the themes and the scenarios, we can identify different dangerous tendencies. These can be connected to these same three themes. In relation to the first types of scenarios dangerous tendencies are about polarization and not understanding. Some of the scenarios illustrate how having different ideas of gender, gender equality etc. can lead towards countries, societies etc being polarized and isolated. In order to prevent this it might be important to invest in fact-checking on social media, reciprocal communication in-between countries about gender policies, platforms for experts on gender theory and more. Other scenarios illustrate instances of hyper fragmentation and the impossibility to still understand each other, for which again solutions like platforms for experts might be necessary. Other dangerous outcomes include the exclusion of perspectives on gender. Similar solutions can be used to avoid this.

In relation to the second theme, dangerous tendencies can be identified with regards to the exclusion of gender identities and their embodiments. In order to maintain and strengthen inclusive gender representation, it is important to give a voice to people of all genders. This can be done by for example investing in ways to make social media platforms inclusive for all genders. To give one concrete example, making sure it stays possible/is possible to choose every gender when making a social media platform. Ensuring inclusivity online can help to safeguard that all genders can gain an online voice. Aside from this, to ensure inclusive, diverse and correct representations of and information on gender injustices it is important to have a wide look at what expertise might mean. As mentioned, funding platforms for experts on gender theory and injustices is important. However, these experts can be people with scientific and academic backgrounds, but they can also be people who have personally experienced gender related injustices. Seeing experience as expertise can be crucial here. Concretely, this can be implemented in for example including more diverse voices in policy recommendations.

Finally, when looking at the third theme we can identify worst possible outcomes in relation to going back to gender inequality or not moving forward towards more gender equality. If we want to avoid this, it is important to realise that changes towards gender equality cannot be put to a stop. For example, when realising that gender quotas make sure more women get into positions of power, we should make sure the implementation of these quotas stays in place for as long as necessary. Furthermore, it was notable that multiple of the scenarios talked about what if women would rule (certain fields) and men would be absent in these positions of power. They were mostly portrayed as positive scenarios, however one mentioned that women -just like men- would also still

	face difficulties. An important note to be drawn from this is that nobody should be excluded based on their gender identities and that in order to work towards a gender equal future, we might need to invest into feminist policies and inclusive practices enhancing issues in relation to all genders. Think for example about paternity leave policies. One of the scenarios also talked about a specific example to ensure more safety in relation to gender violence. It talked about the creation of a social media app which allowed users to gain information, communities and safety help in relation to gendered violence.
4. Additional notes [if any]	/

Validation of the recommendations

Recommendations #1

1.1 Strengthen media pluralism and freedom

1.2. Ensure and strengthen community media

1.3. Establish a European Journalism Fund

1.4. Initiate a European Citizens' Assembly on the European public sphere

1.5. Involve the audience as co-creators of news

1.6. Support alternatives to global platforms

1.7. Include the media in the European critical infrastructures

Recommendation	**1.1 Strengthen media pluralism and freedom** [For full version of this recommendation, see: Volker Grassmuck, Barbara Thomass, An Action Plan on the European Public Sphere. Based on EUMEPLAT WP1, D1.4 (in EUMEPLAT Intranet).]
Abstract	Media pluralism is fundamental to safeguarding democratic values and media freedom. Concentration processes are inherent in a profit orientated media market due to the reigning economies of scale. These in turn restrict competition, thereby reducing diversity. Furthermore, as stated in the EuroMedia reports, "lack of transparency regarding media ownership and funding is one of the key reasons why public trust in news media organisations has been declining" 1. Establish a strong, permanent, informative instrument for monitoring concentration of media ownership and opinion power (possibly by joining the CMPF's Media Pluralism Monitor (MPM) and the EMRG's Euromedia Ownership Monitor (EurOMo). 2. Strengthen the independent European Board for Media Services' powers to take binding decisions on issues of media pluralism with a European dimension. 3. Encourage the development and deployment of tools throughout the news environment both on media and on social media platforms that make relevant ownership and risk metrics available to citizens (similar to the information panel on Youtube that "if a channel is owned by a news publisher that is funded by a government, or publicly funded," provides publisher context and a link to the publisher's Wikipedia page.)
WP	WP1

Proposed by	Volker Grassmuck and Barbara Thomass (HBI)		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI	There is ample evidence of media concentration throughout our project, in particular in the data in WP1 and WP3 and in the overarching theme of platforms. This is supported by the current data from the two Monitors as well as by the high fines that the EU regularly imposes on platform companies for abusing their market-dominating positions.		European Commission, EU Member States

NBU	Globalization makes that recommendation a must for strengthen the independent European media	It is important not only to be present as recommendation, but to insiste on action to be taken	European Commission, EU Member States
UOC			
UGent	Well-rooted in data and existing analysis for many years. This recommendation was – formulated in another context, see D1.3 – as a need for more data, more transparency.	Strong recommendation, but it is more about knowledge, data, and transparency on concentration than that the recommendations will really improve or solve problems for society and democracy linked to concentration (as an antagonism for media pluralism and freedom). Knowledge is a first step to do something about these problems, but this recommendation will not solve the problem.	European Commission, EU member state + researchers
Bilkent			
ISCTE			

NKUA			
UniVe			
IKED			
CU			

Recommendation	**1.2 Ensure and strengthen community media** Note: The PSM section is not included here, as it will be merged with the NKUA recommendations [For full version of this recommendation, see: Volker Grassmuck, Barbara Thomass, An Action Plan on the European Public Sphere. Based on EUMEPLAT WP1, D1.4 (in EUMEPLAT Intranet).]
Abstract	Another partner are **citizen or community media** which were recognised as third pillar when the 'dual' system of broadcasting was established in the mid-1980s. They provide media and information literacy training and active participation in media content production, creating cultural and linguistic

	diversity, social inclusion and intercultural dialogue. 1. Their European umbrella organisation, the Community Media Forum Europe, together with the PSM and the Broadcasting Councils, should be encouraged to establish the **Council of the European Public Sphere** as the multi-stakeholder forum where forward-looking plans can be negotiated. Even the idea of a public media service for Europe could be raised, an EU PSM specifically for cross-border news journalism, democracy-relevant current affairs reporting and debate which would involve civil society and would not take anything away from national PSM.
WP	WP1
Proposed by	Volker Grassmuck and Barbara Thomass (HBI)

Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			

HBI	Our research has shown the need for supporting diversity in media, including by supporting community media in providing the services only they can provide. In particular, WP2.2 data show that discourse on so-called social media is not dominated by common citizens, but by professional actors from media and politics. On the positive side, WP2.4 cast spotlights on Best Practices in Citizen Journalism and found "1) the interest of citizens to collaborate with journalists 2) in the learning and putting into practice of journalism principles and techniques and 3) adding context to journalism, which is always positive for public discussion in democratic societies."		European Commission, EU Member States, Civil Society organisations, Community Media organisations
NBU	Europe needs a united platform for the citizen and community media	Young people gather information from new media and citizen journalism	European Commission and Members media authorities
UOC			

UGent	Good recommendations, but we could think of strengthening civil society organizations doing/having different societal activities including "media" (e.g., human rights organizations being active on issues like inclusion and migration, and who use media/communication channels – see for instance Amnesty 'doing' communication).	Excellent to think about community / citizen media, but incorporate this idea into a broader societal reality and strength of civil society organizations.	European commission, general public, research, civil society, member states
Bilkent			
ISCTE			
NKUA			
UniVe			

IKED			
CU			

Recommendation	**1.3 Establish a European Journalism Fund** [For full version of this recommendation, see: Volker Grassmuck, Barbara Thomass, An Action Plan on the European Public Sphere. Based on EUMEPLAT WP1, D1.4 (in EUMEPLAT Intranet).]
Abstract	The Action Plan should evaluate the past and current measures to support news, in a multi- stakeholder process identify those areas of European news and journalism infrastructure which are crucial for democracy but not able to be delivered by the market and bundle the measures into a permanent fund for independent European journalism.
WP	WP1

Proposed by	Volker Grassmuck and Barbara Thomass (HBI)		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI	WP2 has not given any evidence of European cross-border journalism while the need for it is evident if we want the project of a democratic Europe to succeed. It has been argued that the fundamental rights of media freedom and pluralism do not only have a defensive dimension but imply the obligation to "make every effort to ensure that the conditions for the effective exercise of fundamental rights		European Commission, EU Member States

are met. These preconditions of freedom include not least the pluralism of the media." (Cole/UkrowEtteldorf 2021: 36).

This can be seen as an active duty to establish the conditions of a European public sphere in which citizens can freely receive information and form opinions, not the least in the context of European elections. This duty would first of all fall to Member States (MS). Yet where the cross-border and pan-European dimension of the public sphere is concerned, MS are obviously in less of a position to nurture adequate journalism than the EU.

From 2021, Creative Europe came to include support to the news media sector under the EU's News Initiative.

Most of these support actions are rather specific and temporal. Therefore, calls for a permanent fund to support European independent journalism have been mounting. In 2020, Maltese MEP David Casa led a cross-party alliance calling on the European Commission to set up such

a fund (Newsbook 14.05.2020). Baratsits (in Baratsits 2021: 50 ff.) is advocating a European Media Fund, suggesting a digital tax on platforms as a source for the fund (ibid.: 46). Most recently, Simantke/Schumann (2023) from the European journalists' network Investigate Europe have called for a public service core funding for European journalism. In order for such programmes to actually advance a critical view of EU matters, they argue, it is imperative that this funding be independent of the executive and politics.

IPOL (2023) makes a European Fund for Journalism one of their central policy recommendations. It should aim to promote media pluralism and support the sector of news media in its transition in the digital environment. The fund would exacerbate the risks of political pressure and the threats to editorial independence. "The creation of a Fund at supranational level might help in reducing the risk of political capture, on one hand; on the other hand, it might incentivize trans-national and globalised initiatives, more likely to

	become self-sustainable in the medium term." (ibid.: 78).		
NBU	Encourage local and independent media is crucial for the democracy. Based on WP3 we can confirm, that local media need support to be competitive to global platforms.	When we leave them on the market, the quality of journalism suffers.	European Commission and Members media authorities
UOC			
UGent	Good and necessary recommendation, but there are already national funds for investigative journalism and on a European level, e.g. https://www.journalismfund.eu/ . It's a bit unclear what the recommendation asks for; maybe just more money from the EU? (see 2022 report with quite low budget https://www.journalismfund.eu/sites/default/files/JF_AnnualReport_2022_v3.pdf)	Investigative journalism is crucial for democracy and for bringing independent research-based journalism + giving (independent) journalists the time to do in-depth research for their journalistic work.	European commission, members states' governments, the media industry, general public

Bilkent			
ISCTE			
NKUA			
UniVe			
IKED			
CU			

Recommendation	**1.4 Initiate a European Citizens' Assembly on the European public sphere**
	[For full version of this recommendation, see: Volker Grassmuck, Barbara Thomass, An Action Plan on the European Public Sphere. Based on

	EUMEPLAT WP1, D1.4 ([in EUMEPLAT Intranet](#)).]
Abstract	The EU has deployed the innovative participation format of a Citizens' Assembly for the first time in its [Conference on the Future of Europe](#) (CoFE 2021-2022), with great success.

Since media serve the democratic, social and cultural needs of society and given the success of the CoFE, it seems natural that the Action Plan should prominently feature a European Citizens' Assembly on the European public sphere. |
| **WP** | WP1 |
| **Proposed by** | Volker Grassmuck and Barbara Thomass (HBI) |

| **Partners** | **Evidence-Based?**

In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated? | **What to do with it?**

Reasons for including or not including it; partners' opinion and recommendations | **Who**

To whom the recommendation is destined? |
|---|---|---|---|

IULM			
HBI	Citizen participation in media governance was not a topic of our research. But it is essential element of PSM which are to be governed in distance to state and market, typically by a Broadcasting Council which represents society. And citizen participation is, of course, an essential element of democracy. The EU has been aiming to strengthen participation, e.g. by establishing the European Citizens' Initiative (ECI) in the Lisbon Treaty of 2007. Since then, one million European citizens can "invite" the Commission to prepare a law proposal the citizens consider necessary. Most recently, the EU initiated a Citizens' Assembly in its Conference on the Future of Europe (CoFE 2021-2022), involving more than 700,000 Europeans in events and more than 50,000 online. A Citizens'	@ NBU: The Citizens' Assembly on the European public sphere would be a *one-time*, large-scale, inclusive opinion and decision forming process about remit and structure of the European public sphere. In contrast, R2 is intended to ensure and strengthen community media on a *stable, continuous* basis.	European Commission

Assembly of randomly selected members of a representative sample of the population who debate political issues which are then put to a referendum was famously deployed in Ireland after the 2012–14 Constitutional Convention, where it has been institutionalised since. Other countries and regions held Citizens' Assemblies as well.

The CoFE resulted in a final report including 49 proposals ranging from agriculture, climate, health, education, migration and economy through information and media, digital infrastructure and literacy to rule of Law, European democracy and decision making, transparency and cohesion within the Union.

The three EU Institutions have since taken these recommendations into consideration. The success has led to proposals for institutionalising the European Citizens' Assembly and improving on its first EU version to "make this experience permanent and more

	impactful" (Abels et al. 2022). Therefore, holding a European Citizens' Assembly on the European public sphere seems a logical thing to do.		
NBU		That recommendation can be united with the R2 - Strengthen community media	
UOC			
UGent	The recommendation refers to the success of **CoFE** (please note that the EU uses the abbreviation CoFE and not CoFoE).	Is this just a call to organize another CoFE? Is this really that original as a recommendation? What about civil society organizations organizing this rather than that the EU is involved in it as an organizer.	European commission, members states, civil society, general public
Bilkent			

ISCTE			
NKUA			
UniVe			
IKED			
CU			

Recommendation	**1.5 Involve the audience as co-creators of news** [For full version of this recommendation, see: Volker Grassmuck, Barbara Thomass, An Action Plan on the European Public Sphere. Based on EUMEPLAT WP1, D1.4 (in EUMEPLAT Intranet).]

Abstract	The Internet has empowered "the people formerly known as the audience" (Rosen 2006) to take media into their own hands. With 'users' as active participants, the public sphere changes fundamentally. They express themselves not only in citizen and community media but are invaluable for traditional media as well. EMRG (2022) calls for journalists to cooperate with audiences: "Journalists should perceive audiences not only as sources and recipients, but as partners in news production and dissemination – relevant actors in digitalised journalistic community." While the idea seems quite obvious, actual practices of including citizen journalism in professional media are still rather limited. We therefore recommend to encourage efforts in research and practice to explore this promising path of enriching the journalistic sensorium of society.
WP	WP1
Proposed by	Volker Grassmuck and Barbara Thomass (HBI)

Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			

HBI	Our research has shown the need for supporting diversity in media, including by supporting community media in providing the services only they can provide. In particular, WP2.2 data show that discourse on so-called social media is not dominated by common citizens, but by professional actors from media and politics. On the positive side, WP2.4 cast spotlights on Best Practices in Citizen Journalism and found "1) the interest of citizens to collaborate with journalists 2) in the learning and putting into practice of journalism principles and techniques and 3) adding context to journalism, which is always positive for public discussion in democratic societies."		European Commission, editors, journalism schools, journalism researchers, the public at large
NBU			
UOC			

UGent			
Bilkent			
ISCTE			
NKUA			
UniVe			
IKED			
CU			

Recommendation	**1.6 Support alternatives to global platforms** [For full version of this recommendation, see: Volker Grassmuck, Barbara Thomass, An Action Plan on the European Public Sphere. Based on EUMEPLAT WP1, D1.4 (in EUMEPLAT Intranet).]
Abstract	The alternative to US American and Chinese mega-platforms cannot be a European mega-platform but needs to be a different, decentralised structure. Two concrete developments seem particularly promising. One is the emergence of the **Fediverse**, a network of decentralised social platforms federated with each other via the ActivityPub protocol, creating a whole that is more than the sum of its parts, similar to the blogosphere of the 2010s. The EU has added the Mastodon instance EUVoice and the Peertube EU Video to its portfolio of own communication channels. Public administration and universities across Europe have been joining the Fediverse in recent months, so are media (zdf.social, ard.social, social.bbc). The second remarkable project is **Display Europe**. For the first time, a civil society consortium from community media and free software has been awarded the contract in the tender for European media platforms. Display will launch in December 2023 and strives to make available multilingually translated, syndicated and originally-created, trustworthy, journalistic content from across Europe on a federated, sovereign, self-governed, open-source, digital infrastructure, thereby developing a European alternative to the mega-platforms. A crucial building block for this support is a European Public Digital Infrastructure Fund (Keller (2023) and Digital Assembly (2022)).
WP	WP1

Proposed by	Volker Grassmuck and Barbara Thomass (HBI)		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI	There is ample evidence of media concentration throughout our project, in particular in the data in WP1 and WP3 and in the overarching theme of platforms. The PSM's dilemma: They have to be on the platforms because their audiences are there, but they do not want to be there, because they are optimised for ad exposure rather than public value and PSM are at the mercy of corporations as to		European Commission, EU Member States, the Free Software movement

	changing technical features and house rules. The dilemma of the European digital public sphere: Outside the mega-platforms there is very little of it. And those are optimised for profit, not for democracy-constitutive information and debate. The platform operators are aware about the harmful effects they cause on individuals, communities and society but do little about it. (e.g. BBC 07.11.2023). The counter-movements to concentration is decentralisation. Also, size matters. From moderation through recommendations to business models – everything is different when you have 3.000 vs. 3 billion users. Therefore, the movement to re-decentralise the Internet, in particular by developing the Fediverse, should be actively supported.		
NBU	The projects like those can only gain from integrating young European entrepreneurs	Encourage entrepreneurship within European young people to create and develop platforms.	European Commission. Erasmus+

	and digital natives.		
UOC			
UGent			
Bilkent			
ISCTE			
NKUA			
UniVe			
IKED			

CU			

Recommendation	**1.7 Include the media in the European critical infrastructures** [For full version of this recommendation, see: Volker Grassmuck, Barbara Thomass, An Action Plan on the European Public Sphere. Based on EUMEPLAT WP1, D1.4 (in EUMEPLAT Intranet).]
Abstract	The Critical Entities Resilience Directive (CER 2022) aims at "ensuring that services which are essential for the maintenance of vital societal functions ... are provided in an unobstructed manner in the internal market" (Art. 1). Media are not included in its scope. The draft of the German transposition of the CER also does not cover media but states that Federal Government and Länder may take measures concerning media. The national competent authority for CER, the Federal Office of Civil Protection and Disaster Assistance (BBK), indeed on its KRITIS website includes Media and Culture as one of nine sectors. To be sure, the Directive aims at making plants and technical infrastructure resilient against natural disasters, human error and acts of sabotage, not at protection from disinformation or at ensuring quality journalism. Nevertheless, defining media as critical infrastructure on the EU level would not only have welcome practical effects of hardening them for disaster situations, but it would send a clear signal that media are not dispensable but are in fact an essential critical infrastructure serving the democratic needs of society.

WP	WP1		
Proposed by	Volker Grassmuck and Barbara Thomass (HBI)		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI	Our research, particularly in WP1, has shown that PSM are under attack across Europe. Right-wing and neoliberal parties, economists and social movements want to reduce their public funding drastically if not abolish PSM altogether. Defining PSM as a critical infrastructure would make clear		European Commission, EU Member States

	that they are not dispensable and their essential operations for democracy have to be ensured.	
NBU		
UOC		
UGent		
Bilkent		
ISCTE		
NKUA		

UniVe			
IKED			
CU			

Recommendations #2

2.1 Updating the Protocol of Amsterdam and supporting PSM

[The sub-sections 1 and 3 have been merged, as the protocol is actually is the instrument for supporting PSM]

2.2 Supporting newspapers

2.3 Build new regulatory bodies

2.4 Support smaller media markets

Recommendation	**2.1 Updating the Protocol of Amsterdam and supporting PSM**
Abstract	Public broadcasters continue to have an important role in the media market of Europe

They are currently going through probably the most significant period in their long and distinguished history because of **fundamental changes** to an unprecedented technological development.

In this situation public service broadcasters face new challenges and threats since their operating costs are constantly rising while their revenues remain stable.

Moreover, as the general offers of programs are growing, their TV market share is declining.

This means that public service broadcasters should be transformed to **public service media platforms** to cope with.

For this purpose, the EU should upgrade the 'Protocol of Amsterdam' (annexed to the E.U. Treaty of Amsterdam, October 2, 1997) considering the new developments, otherwise the public service media, an important component of European societies, will be lost in the pay-society era. |
| **WP** | WP1 |
| **Proposed by** | NKUA |

Partners	Evidence-Based?	What to do with it?	Who
	In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	Reasons for including or not including it; partners' opinion and recommendations	To whom the recommendation is destined?
IULM			
HBI		This seems to be based on the assumption that the Amsterdam Protocol is some kind of constitutional foundation of PSM in Europe, which was written 26 years ago for the analogue age and now needs updating for the digital age. In fact, the Protocol is a very specific instrument: an "interpretative provision" attached to the EU Treaties that makes explicit the 'forgotten' exception to the general prohibition of state aid which allows Member States to fund their PSM. Under two conditions: funding is granted "for the fulfilment of the public service remit as conferred, defined and organised by each" MS and it does "not affect trading conditions and competition in the Community to an extent	

| | | which would be contrary to the common interest". In the debate on the EMFA, it became clear that the first is intended to prevent over-compensation – whereas the EMFA strives to prevent under-compensation. The second is the general guardrail for state aid: it always affects the market, but should not do so too badly. This objective of the Protocol is technology agnostic. It is therefore not outdated and therefore needs no updating. That PSM serve the needs of society is not a principle established by the Protocol, but referenced only as a value of the MS which justifies the exemption from the Union's state aid prohibition.

I don't think that technically it would even be possible to update a Protocol to a Treaty. Maybe it would require a new Treaty to be concluded?

The recommendation is concerned with two issues: 1. technological change of and 2. secure public revenues for PSM.

Ad 1.) PS Broadcasters have been transformed into PS Media, i.e. have become digitalised, since the first websites in the mid-1990s and the | |

| | | VoD platforms from the 2000s. The commercial competitors have fought against this, appealing to the Commission on the grounds of unfair state aid, which led to a 'mandatory' public value test for all PSM online offers in the 2010s (Germany has just concluded the 73th test and is therefore world champion, yeah! (https://de.wikipedia.org/wiki/Liste_der_deutschen_Dreistufentests)). Currently, there is the next wave of attacks building, in which press publishers complain to the EU that PSM have too much text on their webpages which would make them 'too similar to the press'.

Given that PSM have already established platforms, what exactly does the recommendation entail? Should PSM give up terrestrial broadcast and linear programming entirely?

Ad 2.) The EMFA, which was just agreed in trilogue and awaits final approval by EP and Council, strives to "ensure the independent functioning of public service media, including by guaranteeing adequate, sustainable and predictable financial resources". (https://ec.europa.eu/commission/presscorner/ | |
|---|---|---|---|

		detail/en/ip_23_6635) I would recommend to 1.) drop reference to the Protocol, since it seems to be based on incorrect assumptions and distracts from the actual recommendations; 2.) to clarify what is intended by the transition from broadcaster to platform and what the national media legislators should do about it; and 3.) to wait for the final wording of the EMFA concerning PSM funding and base a clarified recommendation to EU and national legislators on what is lacking there.	
NBU	The new generations grow up using platforms and would expect such form of communication also by the public media.	We don't have an opinion on this but the HBI's argumentation is very strong.	EU policy makers, national policy makers
UOC			
UGent	The transformation from PSB to PSM (platforms) is a process which is in full development.	We don't have an opinion on this but the HBI's argumentation is very strong.	EU policy makers, national policy makers

Bilkent			
ISCTE			
NKUA			
UniVe			
IKED			
CU			

Recommendation	**2.2 Supporting newspapers**

Abstract	The gradual disappearance of the newspapers in Europe would be a major upset for the European media landscape and culture. Newspapers like public service broadcasters have faced considerable problems for their survival in the age of new media, globalization and digitalization. Newspapers are part of the European culture. **The European Union, regardless the difficulties, must make a difference and promote the survival of the newspapers in some forms, probably through projects that will connect newspapers to education**. Since the media develop and become older with their audiences, newspapers need new younger audiences.
WP	WP1
Proposed by	NKUA

Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?

IULM			
HBI		There is clear evidence in WP1 that newspapers are ailing. But is the EU the right level to do something about it? The press is even more outside the scope of the EU than av media, primarily because it lacks the cross-border dimension of broadcast. In retrospect, the hopes and efforts the founding fathers and mothers of the EU invested into television as means of unifying the continent is still astonishing compared with the near total absence of statements and measures concerning the press. There is an AV Media Directive, but no European press law. AV media are funded under Creative Europe, but not press publishers. The other primary reason seems to be the resistance by the press publishers themselves. Looking from the normative vantage point of the Liberal Model, there is the widespread belief that public press subsidies constitute an undue	

| | | state influence on the media, which should be prevented at all costs. This is echoed by some newspaper publishers. Mathias Döpfner, CEO of Springer and president of the German newspaper publishers' association BDZV, rejects press subsidies and in particular funding for digital media that could compete with paper publishers. In January 2019, he said in an interview: "I'd rather see newspapers go bankrupt than lose their independence through subsidies." (in Horizont 26.02.2019) [D1.1 Patterns in media production: regional models, p. 141]

The press publishers' main political goal has been to improve their market chances. They lobbied for the end of the PSB monopoly of the airwaves and were among the first to set up commercial TV stations. They complained to the EU about PSBs moving onto the Internet trying to keep it to themselves. This resulted not only in the European Public Value Test but also in the ban on 'press-like' services in the German 12th Interstate Broadcasting Treaty (2008), forcing ZDF alone to 'depublish' more than 100,000 articles and 4,000 videos, which corresponded to more than eighty per cent of | |

ZDF's online content of the time. They lobbied against limiting concentrations and prevented European media concentration legislation throughout. They lobbied for the press publishers' ancillary copyright which had failed in Germany and Spain and got it in the DSMD, as a means to make Google & Co. pay them for directing searchers to their sites. And they, – Springer, BDZV (FAZ 10.11.23) and press publishers' associations in Austria and Denmark (epd medien 39/23, 29.09.2023) – are currently starting the next campaign of complaints in Brussels against PSM because their sites allegedly contain too much text. They want to restrict PSM to 'radio-like' and 'TV-like' content and ban from offering 'press-like' content, i.e. any text beyond the title of a video. The press publishers call the EMFA a failed attempt to improve media freedom in Europe. Instead "the EU is tightening a corset that does not address any of the problems" of the press that BDZV is seeing and rather "jeopardizes press freedom." (BDZV 15.12.2023)

BDZV is the spearhead of neoliberal ideology in the industry. We know that the fear over public press funding cannot be supported by research.

			Hallin and Mancini pointed out that "critical professionalism" in journalism in Northern Europe grew in the 1970s when subsidies were highest (Hallin and Mancini 2004: 163). Western democracies with a high level of press funding such as in the Nordic countries are characterised by a high degree of media freedom, a very professional media environment and a low degree of political parallelism. Cornils et al. (2021) in their comparative analysis of press subsidies in seven European countries and Canada with a legal analysis on how such subsidies can be constructed in a rational-legal way while safeguarding fundamental rights and competition and first and foremost the requirement of state neutrality. The most dramatic market failure and therefore need for public support they find in local media. [D1.1 Patterns in media production: regional models, p. 141 ff.] It seems that the anti-public subsidies ideology-based lobbying of Springer, BDZV etc. led to a situation where the EU steers clear of even mentioning the press publishers, and instead talks about support for "audiovisual and news	

media" and for journalism.

In fact, the EU has adopted a growing number of acts with relevance to journalism: on protecting whistleblowers, freedom of information, anti-SLAPP, Media Ownership Monitor etc. and now the most extensive European media law: the EMFA (version adopted by the EP on 03.10.2023). It only mentions the press in the definition of media services and publishers in its goal to safeguard editorial independence against interference by media owners, publishers and managers. No wonder the BDZV is not happy.

And in fact, the EU has a growing number of measures for funding journalism. From 2021, Creative Europe came to include support to the news media sector under the EU's News Initiative. These include support for minority language media, for media literacy and for information measures relating to the EU cohesion policy. In response to the Corona crisis, the Commission in December 2020 adopted an action plan to support the recovery and transformation of the media and audio-visual sector. In its European Democracy Action

| | | | Plan the Commission will work closely with Member States and stakeholders to improve the safety of journalists and provide sustainable funding for projects focusing on legal and practical assistance to journalists in the EU and elsewhere. Finally, the budget for the Creative Europe programme for 2021-2027 has increased by 80% compared to the previous period to approximately €2.5 billion (EC: Media freedom and pluralism).

I would suggest to 1.) look at D1.1 Patterns in media production: regional models where we were discussing press subsidies as one element of Hallin & Mancini's "state intervention in the media system" dimension. I don't think we dealt with newspapers anywhere else?

2.) look at the range of EU funding programmes for (investigative, data, cross-border etc.) journalism. Which we still find lacking and therefore propose Recommendation 1.3: Establish a European Journalism Fund.

3.) Clarify who the beneficiaries of the public support should be: the press publishers, i.e. the media companies, or the journalists? And for | |

		what: delivery of printed papers, production, digitisation and innovation, startups? We should be careful not to accidentally recommend funding those who actively undermine our other and much more dear recommendation of strengthening and digitising PSM. 4.) The idea to connect newspapers to education is interesting. Education and culture – like media – remain the prerogative of the MS. The 2005 UNESCO Convention on cultural diversity has also opened space for EU action which might be connectable to press / journalism. What form could such a connection take? Are there examples, evidence? Newspapers as critical infrastructure for civic education? Every pupil and student in the country gets a printed newspaper every day?	
NBU	Writing for print media gives information and a broader and deeper way of understanding the world, which is very important for young generation.	For sure some kind on support of the print media has to be provided, but we are not sure how exactly this to be done.	EU and local governments

UOC			
UGent	yes.	We have the impression that this recommendation might be more precise and concrete.	
Bilkent			
ISCTE			
NKUA			
UniVe			
IKED			

CU	

Recommendation	**2.3. Build new regulatory bodies**
Abstract	The EU might search for the formation of new regulatory authorities that will oversee the entire communications sector and not only parts of it.
WP	WP1
Proposed by	NKUA

Partners	Evidence-Based?	What to do with it?	Who
	In terms of grounded approach, on which data or evidence do you think this would	Reasons for including or not including it; partners' opinion and recommendations	To whom the recommendation is destined?

	be sustained and legitimated?		
IULM			
HBI		Where within EUMEPLAT have we produced any evidence about media or communications regulatory authorities? There is some mention of them in D1.1 and D1.4 but only in passing and nothing AFAIS that signals a problem. Even outside EUMEPLAT, what is the evidence of a problem and, what is the problem in the first place that the recommendations want to solve? Proposing a small number of agencies rather than the many we have now might imply efficiency gains. But then, assuming that the issues of regulating telecommunications technology, data privacy or content moderation are sufficiently distinct and specialised, what gains are really to be had by dealing with them in separate divisions inside one agency over in	

		separate agencies? The most recent addition is the independent European Board for Media Services that the EMFA will establish: "The Board will be comprised of national media authorities or bodies and be assisted by a Commission secretariat. It will promote the effective and consistent application of the EU media law framework by, among others, issuing opinions on the impact of media market concentrations likely to affect the functioning of the internal market for media services, as well as supporting the Commission in preparing guidelines on media regulatory matters. The Board will also coordinate measures regarding non-EU media that present a risk to public security, and it will organise a structured dialogue between Very Large Online Platforms, the media and the civil society." (EC PR 15.12.23) It still doesn't cover the entire communications sector, but is that the direction this recommendation is hinting at?	
NBU	Current regulatory bodies are not adequate to te rapidly changing	To have new bodies and regulation authorities	EU

	technological changes and their impact on media and societies	for EU	
UOC			
UGent	Yes.	We have the impression that this recommendation might be more precise and concrete.	
Bilkent			
ISCTE			
NKUA			
UniVe			

IKED			
CU			

Recommendation	**2.4. Support smaller media markets**
Abstract	The developments in the communications field cannot easily be followed by the 'smaller' European countries in terms of power, resources and market size. The policies of the 'smaller' countries must take in account the policies of 'larger' countries, rather than the other way around. The result is that those countries, in most cases, try to cope with the changes in the European media landscape. *The EU must adopt a policy framework that will help with **funding and expertise to smaller EU members to better adjust their policies to the new initiatives and developments**.* The experiences from the Euro-crisis could be an example. **Note**: the reviewers, after the first year, did suggest to place attention to the case of small European countries.

WP	WP1		
Proposed by	NKUA		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI		Since the reviewers signaled that they find it important, we should be more detailed here and ideally more evidence based. That size matters and small countries and languages need special support is common wisdom. It is mentioned in WP1, at least in passing. Most of the countries in our project are	

		in this category. Can we find more reflections on these issues, literature, best practices, even recommendations in our deliverables? Maybe in D1.3 or WP3? A quick search shows that there is some literature on this. What are the experiences from the Euro-crisis? Are there established EU instruments for small media markets, e.g. bonus points in Creative Europe funding if you apply from a small country? The EU is actively addressing the language problem, e.g. with support for subtitling Arte.tv and with platform calls that require providing content in 15 languages. DisplayEurope.eu, which was just launched, starts with 20 languages.	
NBU	The national language is a bigger barrier for the countries then the size of their territory	To support smaller languages groups	EU / Local governments

UOC			
UGent	yes, good idea.	We have the impression that this recommendation might be more precise and concrete.	
Bilkent			
ISCTE			
NKUA			
UniVe			
IKED			

CU			

Recommendations #3

3.1 Keep stimulating European co-productions (done)

3.2 Focus on the promotion of European theatrical movies

3.3 Implement new measures against piracy

3.4 Make possible the access to industrial data

3.5 Give space to independent market stakeholders (done)

3.6 Improve the 30% quota policy for VOD platforms

3.7 Favor the use of European national languages in VOD platforms

3.8 Focus on the promotion of European works in VOD platforms

3.9 Coordinate the platformization of Public Service Media

Recommendation	**3.2 Focus on the promotion of European theatrical movies**
Abstract	Another recurring problem, linked to the previous recommendation, is that budgets for promoting and advertising films in Europe are often insufficient, especially compared to budgets for Hollywood movies. A policy in this regard would help European content to be more visible for film theater audiences, as well as it would be beneficial for the movies' careers on other screens and platforms. Although the Audiovisual Media Services Directive (AVMSD Article 13(1)) stimulates member states to think about measures (like quotas or a fiscal levy) to ensure that on-demand audiovisual media services provided by media service providers under their jurisdiction promote, where practicable and by appropriate means, the production of and access to European works. In practice, regulations across Europe are quite diverse. More could be done in order to coordinate legislation and streamline policies across Europe in order to strengthen the development of the European audiovisual and media industries. There is a call for a clearer transparency obligation on how quota are respected, how prominence requirements are met, and how streamers spread spending across different countries; as well as reporting on what producer titles have done in their catalogue, especially if supported with public funds (see recommendations a and b). There is, in sum, a call for a clear framework (whether or not negotiated by producer unions or through the revision of the AVMS next time) to return secondary rights to producers when negotiating with streamers on originals.
WP	WP1
Proposed by	UGent

Partners	Evidence-Based?	What to do with it?	Who
	In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	Reasons for including or not including it; partners' opinion and recommendations	To whom the recommendation is destined?
IULM			
HBI		This recommendation seems to be four different recommendations: 1.) It is asking for money for promoting European movies in theatres. This is similar to 3.8 promoting them on VoD platforms. Maybe these can be merged? 2.) It is asking for the AVMSD rules, incl. on quotas, to be harmonised, possibly by turning the Directive into a Regulation, which would be quite in line with the general EU tendency. This seems to overlap with 3.6 improving the quota. Maybe these can be merged? 3.) It calls for transparency, which overlaps with 3.4 access to data. Maybe these can be	

		merged? ("recommendations a and b" is out of synch with current numbering.) 4.) It calls for producers to retain secondary rights in productions for VoD platforms. Which rights? What is the problem? How would this be a solution? What's the evidence? My recommendation: Put one recommendation in one bullet. Consolidate those that overlap.	
NBU			
UOC			
UGent	yes, good	As already discussed in Lisbon, these are two recommendations, and so they need to be split in two parts. One on the promotion strategies for European cinema, and the other on the quota (transparency, application, …). Maybe the first part of recommendation 3.2 can	EU policy makers, national policy makers

		be put here, under recommendation 3.8.	
Bilkent			
ISCTE			
NKUA			
UniVe			
IKED	A gap in European budgets for promoting and advertising European films compared to Hollywood movies is well founded, but what applies for the film industry elsewhere, e.g., Bollywood or Nollywood? Relations between public and private funding require in-depth analysis. Will increased public investment result in additionality? Not just the amount of public	The call for transparency obligations and reporting on quota adherence, prominence requirements, and spending distribution by streaming platforms, is agreeable. Yet, we risk being trapped by false assumptions about political ability to allocate funds effectively. Better reporting as a means to address lack of accountability cannot be readily assumed to raise the effectiveness of public funding in	Stakeholders in the European film and media industry, including producers, streaming platforms, and relevant regulatory bodies. Public authorities and regulatory bodies at both national and European levels. Imposing obligations on streaming platforms is likely to meet with resistance from industry and other stakeholders. Unions and producers will be affected by

	funding matters but its effectiveness is questionable. What is the scope for public funding to catalyse private investment or induce other beneficial impacts? We have studied Korea's cultural policies and found public support to have been greatly conducive to private sector media development, but not in the way it had been intended.	supporting European content. Rather than imposing more administration and regulation, means of inducing innovation should be in focus. Coordination and streamlining of policies across Europe should be pursued on terms that help support a more cohesive and supportive environment for the audiovisual and media industries. The need for complementary support measures tailored to defend and cherish diversity may be added.	having secondary rights returned to producers. Measures balancing interests should be recommended. Citizens are the ultimate target audience, as consumers of media and movies, and clients in regard to public finances.
CU	Possibly WP1 data from Daniel, e.g., chapter 2 on production WP3 doesn't offer much, apart from the dominance of US movies, but also clear local needs, but this has nothing to do with compensation.	Formulation is a bit complex, maybe the recommendation could come first ("returning secondary rights"). If this is the recommendation, then the title is confusing, because this is about financial compensation, not promotion The title is not about platforms. The idea of fair compensation for European	EU policy makers, national policy makers (but possibly in negotiation with platform)

		movie producers is good.	
		But maybe part of these returns could be used to stimulate more avant-garde / art / community / independent movie production	

Recommendation	**3.3 Implement new measures against piracy**
Abstract	One of the big problems in the audiovisual sector still is piracy, or the illegal acquirement, use, consumption and (often) trade of film content. Fighting piracy and defending copyright are crucial for protecting and strengthening the European audiovisual industries.
WP	WP1
Proposed by	UGent

Partners	Evidence-Based?	What to do with it?	Who
	In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	Reasons for including or not including it; partners' opinion and recommendations	To whom the recommendation is destined?
IULM			
HBI		There is no mention of 'piracy' anywhere in Eumeplat, not even in D1.3. If it's a big problem, why didn't we mention it? What's the evidence of a problem? I did a literature review on the effect of file-sharing on the music industry in 2010 which gave evidence of both negative and positive effects. What is actually recommended? Upload filters were just introduced in the DSMD. There shouldn't be any more issue with copyright on sharing platforms. What is this asking for? More DRM? Bulldozing over confiscated discs in the global south?	

		'Piracy' is a fighting term, that 'piracy kill industry' a propaganda meme by industry which is unsupported by empirical evidence. This seems to be not an evidence but a faith-based recommendation unrelated to our research that I recommend to drop.	
NBU			
UOC			
UGent	yes	Maybe be more explicit on how this recommendation can be defined and operated.	EU policy makers, national policy makers
Bilkent			
ISCTE			

NKUA			
UniVe			
IKED	As stated by others, EUMEPLAT has not collected or examined relevant data in this context. Piracy data is by definition hard to obtain. The economic impact of piracy is even more difficult to ascertain. Impacts on European audiovisual industries represent one aspect would have to take account of revenue losses, potential job losses, and the overall financial toll. On the other hand, economic restructuring may represent a natural response to technical progress. Outcomes for the public and other sectors need to be taken into consideration and interpreted with care. Data and an understanding of consumer behaviour is further required for analytical	Piracy is not a static concept. Regulatory frameworks are often devised under the influence of incumbent technologies and market actors. What is piracy within a certain mode of operation may represent normal practice as new technologies diffuse. Spotify, Skype and WhatsApp are cases in point. While such sweeping recommendations are not to be recommended, EUMEPLAT could call for certain qualified action and measures to be pursued. The relationship between copyright and conditions for creativity, innovation, and investment in the audiovisual sector merit an examination with a view to gaining improved understanding of the consequences and	The European Commission is the main target group when it comes to assessing the consequences across the European media landscape, including cross-sectoral and multi-layered impacts. National governments should similarly be called upon to consider the audiovisual industry in a broader context. Public agencies and regulatory bodies responsible for enforcing copyright laws and implementing anti-piracy measures are most directly concerned when it comes to technical aspects. Producers, distributors, and content creators in audiovisual industries are the target should be called upon to take part in diagnostic of the issues as well as in framing of counter responses to piracy. Companies involved in developing and implementing

and normative analysis. Patterns of illegal acquisition and consumption should take account of access methods, demographics and other key characteristics of pirate consumers, and trends in piracy activities. Data on legal actions against piracy and the effectiveness of enforcement measures represent another domain that merits consideration. What links can be derived between successful prosecution and deterrence? Legal measures and enforcement may not address the root causes of piracy. Data on the effectiveness of digital rights management (DRM) or anti-piracy technologies would have to be obtained and examined for the purpose of determining their effectiveness and rationale. Accessibility, pricing, or changing consumer preferences require consideration in such analysis.	propose countermeasures. A proactive stance against piracy should be devised with a view to enacting more favorable conditions for investment and cross-border collaboration.	digital rights management (DRM) technologies, streaming platforms, and other digital distribution channels, represent a distinct stakeholder category.

CU	Panos wrote a section on digital piracy and VODs, in D3.4 (Catalogue of best practices and main obstacles to Europeanisation)	We agree with the HBI statement, and suggest to drop it. 'Piracy' is more complicated as a process, and rather problematic as signifier. If we want to recommend anything, it should be more nuanced, and grounded in research (we don't have much, and what we have is more nuanced). One could argue that communities of semi-legal sharing is also supporting Europeanisation. If anything, we would defend, together with Panos (in D3.4), the further development and promotion of copyleft-related practices and frameworks).	

Recommendation	**3.4 Make possible the access to industrial data**

Abstract	Major players in the streaming and other audiovisual business mostly have a protective attitude towards the enormous sets of data they have on production, programming/catalogues, distribution/flows, and audience behavior/consumption of audiovisual fare. If these data could be used on an aggregated level, this could help European policy makers and stakeholders in their strategies to develop a productive policy and strengthen the European audiovisual sector. Inspiration could be found in initiatives like the Euromedia Ownership Monitor (EurOMo) that aims at enhancing transparency of news media ownership and control in European Union countries. EurOMo monitors media ownership transparency by making available a database and producing country reports. A similar initiative for continued research on ownership is useful in a sector where major global and transnational audiovisual and multimedia actors utilize various strategies to control the (European) market(s). In this context there is a need to adhere to clear definitions of the different types of actors like in the audiovisual sphere with, for instance, a need to clearly define who is an independent producer and to continue to press for adherence to that definition, despite pressure towards economies of scale.
WP	WP1
Proposed by	NKUA, UGent, and NBU

Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?

IULM			
HBI		If this is not about distribution and usage data, which is the task of the EAO, but about ownership data, then this overlaps with R1.1. Maybe these can be merged?	
NBU			
UOC			
UGent	yes	Maybe we can reduce the length of the recommendation.	EU policy makers, CoE, national policy makers, academia
Bilkent			

ISCTE			
NKUA			
UniVe			
IKED	The proposition is grounded on broad-based market and industry reporting and assessments, not reviewed in detail by EUMEPLAT. The nature and consequence of protective data practices relate to privacy policies, terms of service, client relations, and processing of user data for monetisation purposes.	Demonstrating the value of transparency and accountability is very difficult. Likely consequences of the strategies employed by major global and transnational audiovisual and multimedia actors, e.g., when it comes to accessing European user data and controlling European markets, may still be referred to. Inclusion should be paired with promoting fairness, an even playing field, and creating favorable conditions for a robust European audiovisual industry.	The EU for the purpose of promoting and coordinating measures in support of enhanced transparency in the audiovisual sector. Government agencies and regulatory bodies responsible for overseeing the audiovisual sector are most directly concerned at national level. Incumbents as well as independent players in the audiovisual industry are directly concerned. Journalists, scientists and practitioners play a role in gathering and analysing data related to industry dynamics.

			Advocacy groups as champions of transparency.
CU	Not in our work, but Netflix made this data available. The platform is expanding its data transparency efforts and in December, it released its first biannual viewing report, which has been framed by media as a "massive trove of data" [18,000 titles and nearly 100 billion hours viewed between January-June 2023]. It includes: 1) hours viewed for every title (both Netflix original and licensed TV shows and movies) watched for more than 50,000 hours during that period; 2) the premiere date for any Netflix original TV series or film; and 3) whether a title was available globally. The EUMEPLAT research experience is evidence of this (platforms being protective of their data), with our struggle to get data (in particular for WP3), ended up with purchasing some data (with serious limits) and constantly struggling to	We support the recommendation, but one might consider pushing this further. There is a need to access existing data, yes. But there is also a need to generate high-quality data, for instance in relation to audience behavior. For that, we need more Observatories.	Policy makers (mostly EU) and industry. Universities could also be louder in their protest against data commodification.

find good platform data.	

Recommendation	**3.6 Improve the 30% quota policy for VOD platforms**
Abstract	The revised AVMSD extends certain audiovisual rules to video-sharing platforms, including certain 'hybrid' services such as social media, where the provision of videos and programmes is not the principal purpose of the service, but still constitutes an 'essential functionality' thereof. In fact 32% of all films and TV seasons in VOD catalogues are European productions and 21% are of EU27 origin, reveals the new EAO report. Out of the 27,944 European films released in cinemas between 1996 and 2020, some 59% were available on VOD in May 2021.

Our proposal is to keep the 30% European content requirement, but add a requirement that this applies to new European content produced in the last 3 years. And for European content to be available across Europe, so that Europeans can access new European content from other European countries from anywhere in Europe.

Our research shows clearly that on VOD platforms people are watching films and TV series produced in the last three years. Now the platforms include European content, but the platforms do not offer options for that content to be found. |
| **WP** | WP3 |

Proposed by	NBU		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI		This seems to imply that the 2018 AVMSD extends the quota to VSPs, which it doesn't. The first sentence is out of place. On VoD, the EAO data look quite promising. What do they say about the age of videos? Again this has different elements: 1.) a 'freshness' requirement: 30 % must be European and no older than three years? Three years isn't the usual exploitation window start	

		for VoD, is it? Can't be, at least not for the premium tier. 2.) European content available across Europe: that's the objective of the European quota to begin with, isn't it? What I gathered from the literature is that the actual problem is that national productions are counted as European. Which sets a false incentive if you want to increase cross-border consumption. So should the recommendation be to explicitly require the European works to be from other European countries than one's own? 3.) Seems to be recommending to require platforms to provide filters for European origin and release date?	
NBU			
UOC			

UGent	yes, good	Maybe more precise on concrete recommendation.	EU policy makers, national policy makers, industry
Bilkent			
ISCTE			
NKUA			
UniVe			
IKED	The proposal to maintain a 30% European content requirement but focus on new content is based on assumptions on the virtues of a quota notably of promoting fresh material. Underpinning such a recommendation with empirical data appears hard – any recommendation of	As presently formulated, we do not view the recommendation as agreeable. Rather, attention should be devoted to the mechanisms through which viewers are informed and what is key to shaping their preferences/behaviors, along with determinants of their position to access various	The primary audience consists of European Union regulatory bodies responsible for overseeing audiovisual media services. Video-On-Demand platforms are asked to adjust their practices to meet the outlined requirements. A top-down approach would have to be combined with mechanisms

	such sort therefore risks looking arbitrary. Determining an "optimal level" throughout the EU is also not possible. It may be recommendable to identify country-specific conditions that influence what is desirable, and reason around the benefits that apply under varying circumstances (incl. universal vs. specific recommendations).	content/country content. Negative side-effects of regulations and quotas need to be awarded serious attention and meet with contingency measures. Quotas can, for instance, play into the hands of regimes with autocratic tendencies, such as Hungary, Slovakia, and Poland in recent years.	for bottom-up collaboration. Important stakeholders include producers of European content, especially in recent production as they would benefit from increased visibility on VOD platforms. At the end of the day, the proposal indirectly targets consumers and the general public. Proponents would argue that it sets out to provide them with a richer and more genuine experience, protecting against dangerous domination by rogue players which over time will run down competition and cultural diversity. Others would perceive impediment to user choice and innovation. A balance act is required, in search of determining conditions conducive to benefits while minimizing the costs.
CU	The Czech WP3 data show how important the archive (of historical films) is for the Czech audiences …	The problem lies maybe elsewhere? Problem 1: European content is too invisible (with 30% present, but deep down in the platform) Problem 1 might be hard to solve with regulation, as all interfaces are different; still, European films and series should not be 5 clicks	Recommendation is EU-level, but increasing visibility is more national and platforms themselves …

| | | away, and platforms should be motivated to give more visibility (through incentive

Problem 2: Platforms use the archives to 'fill' the 30% criterium, which is sort of abusing the archive

Still, if there is focus on 'freshness', then wouldn't this be working against the archive? Isn't this going to be counter-productive, with no incentive left to screen movies from the archive).

Problem 3: National films are counted as European films, not necessarily allowing for material from 'other' European countries to be screened. Part of the 30% could be for non-national European movies | |
|---|---|---|---|

Recommendation	**3.7 Favor the use of European national languages in VOD platforms**

Abstract	In most of the cases the audiences prefer to watch movies and TV series in their national language. When that is not possible in most of the cases the audiences choose English, but not as subtitles, but as the main language of the film/TV series. That puts all European movies, which are not in English or at the national language of the audience at risk, not to be preferred by the audience. If the AVMSD included the obligation to include national language to all European movies/TV series that will make those movies and TV series more accessible to European audiences.		
WP	WP3		
Proposed by	NBU		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			

HBI		Unclear: Does this recommend a legal obligation to dub rather than subtitle? Or does it mean that a Swedish movie needs to have German dialogue, or rather every European work must contain all other 26 EU languages? Please clarify.	
NBU			
UOC			
UGent	yes, good	Maybe be more precise in the concrete recommendation in terms of translation options.	EU policy makers, national policy makers, industry
Bilkent			
ISCTE			

NKUA			
UniVe			
IKED	The proposal is grounded in an understanding of audience preferences which suggests that viewers prefer content in their national language, or in English. We question that position is underpinned by robust data and/or analysis. Surveys, viewership data, or market research would seem helpful in this regard. Even so, how generic insight could be derived? Regional differences are plausible. For instance, neighboring countries may tend to display less of the implied kind of pattern. A grounded approach might involve a comparative analysis of viewership statistics, exploring the cross-border popularity of movies and TV series in	Not clear what the recommendation is. A more general recommendation would be preferable, e.g., search for measures to support the appreciation of linguistic diversity in Europe. Examples may include proactive cross-country cooperation at the publication stage, smart marketing, co-productions between European countries, etc. The EU might incentivise such agendas, which may moreover serve as a substitute to the proposed measure (evaluation in this regard may be recommended). Although the proposal may be framed as taking an audience-centric approach, making it obligatory does not make sense if it is ineffective/irrelevant in some cases, and also if there is a risk that audiences become less prone to make the effort to watch European content from other countries in their national	As for technical aspects, the primary audiences for this recommendation constitute the European Union regulatory bodies responsible for the AVMSD. These entities would play a key role in incorporating language obligations into the directive. The proposal cannot be judged by those authorities by themselves, however. Judging the pros and cons requires a holistic approach. It is likely to be out of sync with perceived preferences at least in Northern Europe. Filmmakers, content creators, and producers in the European audiovisual industry represent stakeholders who would be directly affected. Many may perceive their cultural integrity undermined. Their input and cooperation could not be universally guaranteed. How to promote diversity in this respect would remain an issue. Platforms and broadcasters that distribute European

	different languages, so to assess more deeply the argument for mandating national languages under specific circumstances.	language. Imposing language obligations may further hurt artistic expressions and reduce inter-cultural literacy. Implementing language obligations would pose practical challenges in terms of subtitling, dubbing, and ensuring high-quality translations. The feasibility and cost implications would require consideration. They would have to be weighed against the benefits, which are likely to vary significantly across Europe. Analysis could be recommended of the effectiveness of the current provisions within the Audiovisual Media Services Directive (AVMSD) in achieving linguistic diversity and other desirable objectives.	content would be directly impacted. Their assessments of benefits vs. costs should help judge the merits of the recommendation. Audiences and language advocacy groups interested in promoting linguistic diversity in audiovisual content might take varying positions. They should be given the opportunity to advocate one way or the other.
CU	WP3 looked at language presence, but we didn't have that much detail	This could be about dubbing, or about subtitling. If that is not the case already, a policy requiring AV pieces on the VOD platforms to have the original soundtrack would be good.	Proposal for EU regulation (in negotiation with platforms)

Recommendation	**3.8 Focus on the promotion of European works in VOD platforms**		
Abstract	As platforms are global and their main goal is the global audience, they invest in promoting USA productions and coproductions or their own productions. They do not have the duty to promote European productions. At the same time the promotion of EU movies and TV series is not as prominent, aggressive and omnipresent as that of USA productions. The responsibility to promote a production is to the producers. Our proposal is to open more opportunities for supporting promotion of EU content. At the same time an initiative for cooperation between European communication agencies and European movie and TV series producers will result in better promotion of European content.		
WP	WP3		
Proposed by	NBU		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?

IULM			
HBI		The MS do have the duty to ensure that platforms ensure prominence of European works (Art 13 AVMSD). This recommendation is similar to R3.2 promoting them in theatres. Maybe these can be merged?	
NBU			
UOC			
UGent	Yes, good	Maybe the first part of recommendation 3.2 can be put here, under recommendation 3.8.	EU policy makers, national policy makers, industry
Bilkent			

ISCTE			
NKUA			
UniVe			
IKED	Data on the investment pattern of global platforms is available and can be drawn upon to adequately "map" the presence of such a gap in emphasis on promoting US vs. European productions. Not only comparisons with the US are relevant, but so are patterns and trends in regard to emerging centers of audiovisual content, as in Africa, the Middle East, and East Asia. Market analyses, advertising spending data, and audience engagement metrics could provide further inputs. Evidence of successful cooperation	It is rightly argued that addressing the imbalance in promotion by global platforms would be desirable but is hard to implement, except through indirect measures. It is not entirely clear what is intended by the formulation as presently formulated. Greater clarity would be desirable. Creating "opportunities" might suggest embarking on capacity building in support of enacting smart, holistic procurement strategies, incentivising and enabling producers to become more active and effective with regard to promotional activities.	In terms of general policy oversight, European Union regulatory bodies, as well as European communication agencies, seem targeted. Cross-sector collaboration is put forward as a vehicle to achieve more effective promotional strategies. The recommendation seems to imply a coordinated collaborative scheme at multiple levels to help underpin the ability of producers to assume a more active role in promoting their content.

	initiatives between communication agencies and European movie/TV series producers in promoting content might provide support for the proposed solution. Proposals for instigating cooperation between European communication agencies and producers assume the presence of latent synergy between creative content and effective promotion. The risk of downsides, perhaps institutional interference, streamlining and commercialisation at the expense of cultural diversity and freedom, merit consideration. Related to this, the impact of alternative promotional strategies should be examined and evaluated.		
CU	In WP3 we see how European films struggle for visibility.	We support the proposal to open more opportunities for supporting the promotion of EU content. The title might not be perfect. It's not clear how this promotion should be	PSM & EBU (Creative Europe and national support for independent film)

| | | organized or how desirable this is, as this is a direct subsidy to commercial platforms. We would see the relevance for independent movies/series.

One alternative is to have trans-platform promotion but also aggregation. Maybe a European public service platform? Or a stronger network of European public service platforms? (so shouldn't this part of 3.9?) | |

Recommendation	**3.9 Coordinate the platformization of Public Service Media**
Abstract	Public service media (PSM) benefit society in many different ways from the positive impact they have on culture, education and democracy to their impact on the technological and the economic life of nations. Many representatives of the new generation get all their information online. The platform became a familiar standard for getting news. If we want to secure the place of PSM they have to make steps to platformization of their content. There are good examples, but not all PSM are on their way to platformization at the moment. According to data 72% of internet users in the EU now get their news online. More people are accessing news via social media than through news websites. At the same time the interest in news has fallen sharply around the world, from 63% in 2017 to 51% in 2022. If we want to win the battle with fake news and disinformation we need to make PSM content accessible online for all Europeans, which means to encourage PSM to digitalised their

	content and to make it accessible to the users.		
WP	WP3		
Proposed by	NBU		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI		PSM is addressed in R2.1. Also it feels out of place to argue with news consumption in a section that is clearly about movies and series, i.e. fictional av products.	

		I would recommend to merge this with R2.1 and drop it here. (BT: I completely agree!)	
NBU			
UOC			
UGent	yes, good		
Bilkent			
ISCTE			
NKUA			

UniVe			
IKED	Data showing the decline in interest in news worldwide, along with the shift towards online news consumption, is readily available, e.g. from Eurostat or Statista. Examples of successful platformisation initiatives by public service media (PSM) organisations could be referred to. Examples are available in the Nordic countries and have been reported in WP1 and WP2 of EUMEPLAT. Performance metrics and user engagement data are part of the picture. Such examples do not necessarily underpin generic recommendations applicable throughout Europe. Evidence of how PSM content, made more accessible online, has helped counter fake	The observed changes in user behaviour when it comes to accessing news and how, along with growing problems of populism, fake news and data mismanagement, motivates consideration of accessing news via platformisation on-line. By being present on the platforms, PSM content would be accessed more broadly. The broader societal roles of PSM in culture, education, democracy, and economy could be boosted too. PSM organizations face resource constraints. Entering a stage of digital transformation may divert resources and knowledge generation from traditional core business. However, traditional broadcasting methods cannot be transferred on-line without change of style and content. Risks of PMS going on-line weakening the ability of PSM to maintain quality	Public service media organizations are called upon to embrace platformisation strategies to make their content more accessible online and adapt to changing audience behaviours. Government entities and regulatory bodies overseeing media services are encouraged to support and incentivize PSM organizations in their platformisation efforts. Policies that encourage digital transformation and online accessibility are viewed as beneficial. It is proposed that other stakeholders in the media industry, including technology providers, advertisers, and content distributors, can support and collaborate with PSM organisations in their platformisation initiatives. A collective effort is encouraged. Educational institutions can help foster digital literacy and promote PSM content online. Integration of PSM resources into educational platforms may enhance the accessibility of quality information.

	news and disinformation, could be helpful.	news could represent an issue. Each PSM needs to work out the strategy that best suits their situation. There appears to be no clear policy-rationale to tilt the balance one way or the other when it comes to inducing PSM to go on-line. Maintaining sufficient diversity and viability in the PSM sector, on the other hand, can be well motivated on the basis of public goods argument (PSM organisations might be best placed themselves to judge when going on-line in this respect). The recommendation should be adjusted so as to place emphasis on policy measures to support capacity-building and competence development by PSM for underpinning sound and socially favorable strategies in regard to developing on-line news	The policy rationale and overall impact of inducing PSM to go on-line will require consideration by policy coordinating bodies. Not all PSM may be well suited for offering content on-line. Doing so may distort and weaken the performance of others overall. Examining and drawing lessons under which conditions and with which means PSM can and should expand on-line is a joint task for researchers, practitioners and policymakers.
CU	In WP3, we have data on PSM in the Czech Republic, showing their key role in protecting (audiovisual) cultural heritage.	This might reduce PSM to news, which is only part of the story. Secondly, news circulates often through social media, and improving that environment (as	PSM

		'host' for news) might also be important.	
		Maybe the PSM should not be seen as automatically and necessarily perfect, but PSM monitoring quality-improvement might also be important	

Recommendations #5

Opening Up to Civil Society (*)

5.1 Draw a plan for algorithmic literacy (**)

5.2 Call for a participatory productive ethics

5.3 Foster the discussion with NGOs, associations, and civil society

5.4 Define a strategy for positive algorithmic discrimination for giving voice to under-represented minorities, and especially immigrants

5.5 Planning of more tailored literacy campaign (**)

5.6 Monitor the activities beyond the institutional domain

(*) List of the authors to be detailed

(**) Recommendations 5.1 and 5.5 can be merged

Recommendation	**5.1 Draw a plan for algorithmic literacy**		
Abstract	The need for improvement/increase in algorithm literacy and education was repeatedly mentioned in future scenarios. One scenario titled EU Justice League of Literacy (Scenario Card 11) accentuated the need for international cooperation in an educational organization powered by all EU member states. The scenario imagines a future where algorithm literacy in European society is high, accessible as the basic needs, and algorithm literacy is coordinated on the trans-national level by a separate organization called the European Justice League of Literacy. Algorithm literacy was described as understanding what this technology is doing and how it is taking away your choice or providing you a choice of not really providing you a choice (Delphi+ Participant 5). The organization s goal would be an independent spaceship approach that finds an easy way to explain to people what algorithms are doing to their lives and what that makes to their choice.		
WP	WP5		
Proposed by	Miloš Hroch (CU)		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would	**What to do with it?** Reasons for including or not including it;	**Who** To whom the recommendation is destined?

	be sustained and legitimated?	partners' opinion and recommendations	
IULM			
HBI		The text is an imaginary scenario by a single person in a Delphi workshop coming up with a fancy name and proposing to find an easy way to explain what algorithms do? I would be good to re-phrase this as an actual recommendation. Which is that the MS establish such an organisation? The EU? Civil Society? It would also be good to connect the recommendation with what is coming in the EMFA: The "European Board for Media Services" that the EMFA establishes is likely to be tasked with: Art 12 "(mc) exchange experiences and best practices on media literacy, including to foster the development and use of effective measures and tools to strengthen media literacy;" (EMFA COREPER Draft, 19.01.2024).	

NBU	WP2 and WP5 results show the need of deeper media literacy trainings for all age groups, which includes the knowledge for the algorithms	More transparency in the way algorithms work - policies towards the social platforms owners and AI providers.	EU Authorities
UOC	Jim: This is not specifically looked at in WP4 (which we know the best). Silvia: However, the need for greater and more specialized literacy in the face of media and digital evolution is evident in several reports. Of special interest is the impact on young people who mostly get their information through social networks (as reflected in the Digital News Report) whose operating dynamics are marked by these algorithms. Thus, in the White book about Competencies in digital social education aimed at digital citizenship and youth participation it is noted that "the ability to detect and know when and how these algorithms work can favor a more critical vision regarding the representation and selection of the content received". In	Jim: What situations does this recommendation address? To me it sounds like the recommender systems, which may have both positive and negative effects for individuals. Regardless, increased literacy may help with this. However, I believe algorithmic literacy is even more important for other areas such as generative AI. Silvia: There is great ignorance about the effects of algorithms, both positive and negative. This applies, for example, to those who operate following the recommendations or selection of content shown. So, although studies have been carried out that deal with the plain resonance chambers or bubble filters, others also limit their impact. Although it is clear that they condition the consumption of content. On the other hand, there is little transparency to	Jim: Policy makers, civil society Silvia: EU authorities, researchers, academia, civil society

	2017, the Pew Research Center in its report [Code-Dependent: Pros and Cons of the Algorithm Age](#) dedicated one of its sections to the growing need for algorithmic literacy (following the arguments of experts and professors). More recently, in 2023, [UNESCO presents a cal](#)l to define algorithmic literacy from a perspective evidencing the growing interest in this issue.	know how they act, which would imply the need to have regulation that allows us to know how they operate.	
UGent	There are many reports indicating the importance of media literacy. We don't know to what extent existing European organisations already take into account algorithm literacy, see https://digital-strategy.ec.europa.eu/en/policies/media-literacy, see https://eavi.eu/	Include the recommendation	Civil society organisations; EU; national authorities
Bilkent			

ISCTE			
NKUA		An educational programme to understand how algorithms work in our daily lives, and the implications at the societal level is certainly necessary for EU citizens. And this need has to be addressed not only on a project/campaign level, but on a permanent basis. Such a recommendation should emphasize the issue of equality in terms of citizens' access to algorithm literacy opportunities. By developing citizens' competences indiscriminately in navigating algorithmically curated environments would benefit democratic society as a whole. We fully agree with the proposal, but it should be formulated as a recommendation, without referring to the specific future scenario case.	Civil society organisations and national authorities engaged in media literacy. A collaboration between the proposed European Justice League of Literacy and the above organisastions would be truly useful.
UniVe		Introducing how social media platforms work at school and college level should be mandatory due to their increasing use amongst the	

		teenagers. Social media platforms need to be more transparent and the code should be made open source to understand the internal mechanism of the platform's algorithm. Users will be more aware of the information they are sharing with the algorithm and how it can assist the user into using the platform.	
IKED	A case for increased media literacy arises from W3 and W4, but not quite for this specific argument	The idea is interesting but must be reformulated if applied to recommend policy	
CU	See 5.5	5.1 should be integrated with 5.5(2) and 5.5(3)	See 5.5

Recommendation	**5.2 Call for a participatory productive ethics**

Abstract	The development of an over-arching Participatory Production Ethics, which will group the already-existing but fragmented initiatives in a variety of societal domains (e.g., the initiatives against cyber-bullying). As this is a substantial social change project, requiring citizen/platform user involvement, and a participatory bottom-up approach is unavoidable, a roadmap for stakeholder involvement will need to be created, in order to set up a large- scale, expert-supported, participatory process, making use of (by now accepted) methods for citizen participation such as citizen assemblies. In a next stage, educational processes—at both formal and informal levels (ranging from the educational system to communication platforms)—need to be organized to mainstream (or hegemonize) these Participatory Production Ethics.
WP	WP5
Proposed by	Nico Carpentier (CU)

Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			

HBI		Is "Participatory Production [Productive] Ethics" an existing term? Can't google it. I find ethics in participatory research etc. The closest might be in cooperativism ("Ethical Economies: Cooperativism and Class"). How does a Production Ethics relate to initiatives against cyberbullying? Who are the stakeholders: citizens, platform users, not workers? If so, what does "production" mean? "user-generated content"? What would the Ethics entail, a ban of child labour, environmental destruction etc.? Or would it concern only media, not physical production? What is the problem this recommendation tries to solve?	
NBU			

UOC	Jim: Not sure	Jim: In a similar vein as HBI, I also feel that this recommendation is too imprecise (and therefore a bit difficult to understand) at the moment. However, I like the general idea, but it seems difficult to successfully carry out with the desired impact.	Jim: Citizens, but needs to be further defined to give a more accurate answer.
	Silvia: As mentioned in the previous recommendation, citizens still do not receive complete and updated literacy training to the changes we are experiencing. For this reason, in many cases they are not aware of the effects of the produced and consumed contents. They tend to be aware of the most problematic cases and that they tend to be related more to violations of the legal framework while other ethical issues go unnoticed.	Silvia: Greater literacy among citizens is necessary to integrate their participation to influence ethical issues. Thus, even though the idea excites us, we currently see difficulties in applying it successfully.	Silvia: It can be promoted by institutions, associations, etc., but there is still much to do in this area.
UGent			
Bilkent			
ISCTE			

NKUA		What is Participatory Production Ethics? Is it a formal recognition of producers' role in the state and health of deliberation in social media? To whom it is addressed to? Users that produce content or also people who consume this content and comment? There are studies highlighting the role of metacommunication as a self- regulation mechanism to combat online toxicity especially in the comments thread. Is it more than a self- regulatory measure? We agree to be included as long as the recommendation objectives focus on how it addresses phenomena such as hate speech, toxic debates and bullying on the web. It needs to be investigated whether a pattern of Participatory Production Ethics fit for all European countries can be agreed upon and if so under which conditions.	
UniVe			

IKED	The aspect has been raised although in somewhat general terms. Examples: - WP2 on the transition of media production towards platformisation. - WP5 Delphi workshops on inclusion and multidisciplinary participation	This is an important recommendation that we adhere to Participatory Production ethics is highly relevant for media production involving multistakeholder participation/collaboration, e.g., co-creation. Ethical principles of inclusion as well as safe-guarding that "unusual suspects" are given sufficient access to the co-creation space are of high importance. It should be underlined, however, that application of ethical principles needs to be backed by adequate training and guidelines, requiring an addition to the present formulation.	The recommendation as formulated goes all over the place. It is effectively communicating to all stakeholders engaged in managing processes and platforms with serious ambitions to achieve co-creation and bottom-up engagement.
CU	This recommendation is grounded in the WG5 backcasting exercise on TF2 and TF4. Also WG2's work on social media debates is relevant here.	We tend to agree	See 5.5

Recommendation	**5.3 Foster the discussion with NGOs, associations, and civil society**

Abstract	(1) In relation to the second theme, dangerous tendencies can be identified with regards to the exclusion of gender identities and their embodiments. In order to maintain and strengthen inclusive gender representation, it is important to give a voice to people of all genders. This can be done by for example investing in ways to make social media platforms inclusive for all genders. To give one concrete example, making sure it stays possible/is possible to choose every gender when making a social media platform. Ensuring inclusivity online can help to safeguard that all genders can gain an online voice. Aside from this, to ensure inclusive, diverse and correct representations of and information on gender injustices it is important to have a wide look at what expertise might mean. As mentioned, funding platforms for experts on gender theory and injustices is important. However, these experts can be people with scientific and academic backgrounds, but they can also be people who have personally experienced gender related injustices. Seeing experience as expertise can be crucial here. Concretely, this can be implemented in for example including more diverse voices in policy recommendations. (2) The report on task 2.2 identified some dimensions of Europeanization that were most addressed on social media, like European Law & Governance, and Political and Economic dimensions. But also some other dimensions that were much less addressed in the discussion about Europe on social media, like European Values, New Social Movements and European Public Sphere. One recommendation to improve the discussions about those dimensions on social media would be to improve and support the cooperation between NGOs and other European grassroots institutions to foster the discussions of those issues in the European Public Sphere. Creating a European cooperation network of such institutions (following the example established by the EDMO European hubs) could stimulate that development.
WP	WP2 and WP5
Proposed by	(1) Sofie Van Bauwel (UGent)

Partners	(2) Cláudia Álvares, Miguel Crespo, and José Moreno (ISCTE)		
	Evidence-Based? In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?
IULM			
HBI		(1) seems to call for UI design and funding of expert platforms. How does the latter relate to two expert networks advising the European Commission already: the Scientific Analysis and Advice on Gender Equality in the EU (SAAGE) network and the European network of legal experts in gender equality and non-discrimination? (2) calls for support of CSOs in establishing European networks. Don't those exist already? The consumer protectors have BEUC as their	

		representation in Brussels, the digital human rights orgs have EDRi, the community media have the Community Media Forum Europe, the fact-checkers, as you mention, have EDMO etc. All of them are based on national orgs, and they cooperate across policy fields wherever that makes sense. So what is the problem this recommendation is trying to solve? Is there evidence? Has any CSO said that they would wish for this kind of support? How are (1) and (2) connected?	
NBU	The results from WP2, WP4, WP5 show the need for a better networking and cooperation of different NGOs and organizations towards fighting fake news, propaganda, misinformation and the increasing hate speech.	Common efforts between NGOs, institutions - European and local, other bodies could bring better results. Good solution is to create a network among them.	EU and local institutions and NGOs

UOC	Jim: WP4: (1) identity is analyzed and (2) can be adapted to WP4 as well. Silvia: The limitations on entry, for example when creating a profile on some platforms, exist in the moment in which personal information is requested or not all the options to be able to feel identified are included. On the other hand, other situations of exclusion are generated by the users with their interaction (for example with their comments). To this we must add other biases that artificial intelligence can incorporate, as has been seen in such well-known cases as the cataloging of images by Google Photos or Tay, the bot that Microsoft presented on Twitter.	Jim: (1) Seem to be unrelated to the title, but is a good recommendation with clear practical examples. (2) is also clear. However, maybe a little more justification to why the less discussed dimensions are important to discuss is needed. Silvia: Good recommendation but more explanation is necessary.	Jim: Policy makers Silvia: EU authorities, local institutions, ONG's, associations and social movements
UGent			
Bilkent			

ISCTE			
NKUA		(1) Does this recommendation imply that the platforms place discrimination tactics among users? Feeling excluded in social media debate is more a problem cultivated by the behavior of other participants (toxicity) rather than the formal policies of the platform. If this network of experts is about to provide education on gender equality across the society, thus fostering a new ethos among social media users, then this recommendation could be seen as relevant under the spectrum of a new literacy campaign described in 5.5. (2) How do these two recommendations complement each other? The difficult task in these recommendations lies in how NGOs, associations, and civil society can be persuaded to collaborate smoothly and constructively given that in every national context the progress that has been made in relation to gender voices inclusivity is different.	

		They may be worth inclusion after further elaboration and as long as the description on how the problem is addressed is pragmatic and feasible for different national European contexts.	
UniVe		Creating a network between all the concerned actors will provide more inclusivity and improve the discussions with gender bias creating a safer space for media literacy.	
IKED	EUMEPLAT WP4 in particular demonstrates the presence of explosive gender-related social media activity in EU countries. No evidence has been presented, however, for need of EU-level interference with content and which organisations ought to be more active to such effect.	1) There is no clear problem formulation here. Conditions vary between member countries and it is not a task for the EU to prescribe functionalities as suggested 2) Vibrant such activity is evolving organically in the EU. No clear-cut rationale is in place for EU-level interference. Another suggested orientation for possible recommendation: The EU could request member countries to monitor and develop	

		strategies to, e.g., counter abuse –	
CU	The research on Europeanization from below, which is in: -WP1, theoretical framework (map of approaches) -WP2 shows the focus on the institutional, less on the popular (see also article in review on the Czech case) -WP4 also has the quali study on migration and gender, and the activation of gender as tool of exclusion -WP5 future scenarios on cultural change, on gender equality (and its threats), on overcoming distrust in WP5-TF1	- The title should refer "NGOs and other civil society actors" - Both should be integrated into one, with an argument for the creation of, and support for, European networks of NGOs, also connecting them to universities. The idea (to coordinate existing national civil society organizations) is good, and the EDMO example indeed a model -One network is proposed to focus on gender equality, another on europeanization from below. We could also have a network for (online) media watchdogs	EU as subsidizing entity, financing these networks; regulatory bodies at national level should add consultative mechanisms

Recommendation	**5.4 Define a strategy for positive algorithmic discrimination**		
Abstract	The report on task 2.2 concluded that news media have significant difficulties in gaining levels of reach and attention on social media platforms similar to those obtained by non-news media agents on the same platforms. As a consequence, news media find themselves pressured to fight for attention by engaging in the kinds of more polarizing content that social media platforms' algorithms favor. One way to counter that trend would be to algorithmically favor news media content on those platforms. This could be achieved either by self-regulatory measures by the platforms or by compliance demands imposed by the regulatory authorities.		
WP	WP2		
Proposed by	Cláudia Álvares, Miguel Crespo, and José Moreno (ISCTE)		
Partners	**Evidence-Based?** In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	**What to do with it?** Reasons for including or not including it; partners' opinion and recommendations	**Who** To whom the recommendation is destined?

IULM			
HBI		Title would avoid misunderstandings if it said "positive algorithmic discrimination of news". Good idea. But how do we know what is news, so we can favour it? The EMFA seems to be creating the databases which the platforms could simply plug into. It defines a category of 'media service providers' (Art 2.2, EMFA COREPER Draft, 19.01.2024). This status is self-declared together with more self-declarations and the obligation to provide contact details (Art 17.1). And it creates the media privilege so that platforms cannot remove or block media providers' content because it is incompatible with its terms and conditions unless they send a statement of reasons and give the media provider 24 hours to respond (Art 17.2). Furthermore, the EMFA creates the more detailed category of "media service providers providing news and current affairs content".	

		This is in connection with the obligation of media service providers to report ownership information into a mandatory national media ownership database. And it leads to the obligation of these news providers to guarantee the independence of editorial decisions (Art 6.2). I expect something like MAVISE for av services to be developed for media services, incl. news and current affairs.	
NBU	WP4 and WP5 results for propaganda and disinformation	As mentioned: self-regulatory measures by the platforms or by compliance demands imposed by the regulatory authorities by changing the algorithms	EU authorities and platforms
UOC	Jim: WP2, WP4 Silvia: The changes in information consumption habits are clear. In recommendation 5.1 we already made reference to the Digital News Report where the trend is evident. Platformization	Jim: Good and practical recommendation. However, are we sure it will have much impact? Perhaps the low reach is mostly explained by the facts that users on social media prefer non-media content, including more polarizing content. Regardless, could be worth a try. Additionally, probably difficult to implement	Policy makers and platforms. Silvia: EU authorities, News media associations, journalistic organizations, platforms

	impacts the news media, which see the need to include new routines related to SEO techniques or dissemination strategies to capture the attention of citizens.	given the atmosphere around social media as you need to define what is "good/credible" news and not. Silvia: The application can be complicated and would require reflection in many ways. In Spain, the Google tax wanted to guarantee intellectual property rights but its application produced a decrease in traffic to the media when Google News stopped operating there. This showed, on the one hand, the dependence of the media on external platforms to attract visits and, on the other hand, the margin of action for the platforms in the face of certain types of measures. Also, as Jim comments, the reach may be limited if users' tastes reject this greater exposure to media content as they prefer other content. Without forgetting the existing difficulties related to issues such as credibility, veracity and informative relevance. All of this does not invalidate the opportunity to develop and apply this recommendation.	
UGent	good	is it feasible?	Platforms; EU

Bilkent			
ISCTE			
NKUA		Privileging media's content on social media platforms sounds a little bit peculiar given that social media are mainly discussed under the scope of their participatory character enabling different and marginalized voices to be heard. Besides, who is going to safeguard that this kind of media support will lead to more pluralistic content consumed online? Do we need to have some sort of requirements under which certain media will gain the support? Is this recommendation a general support towards alternative media that give voice to marginalized groups? Could a call for algorithmic transparency for the criteria selected for each users' feed, in a similar way as the ads criteria where revealed to users (https://www.facebook.com/help/79453577760 7370, https://techcrunch.com/2023/02/14/meta-	

		improves-its-consumer-facing-tool-that-explains-why-youre-seeing-that-ad), be more helpful ? If the recommendation is to be included it is worth setting the objective - among others – that a series of major standards will be respected (e.g. diversity of themes and voices) by news organisations when disseminating news items on social media platforms.	
UniVe		Any kind of bias whether positive or negative can lead to polarization. A positive algorithmic bias even though enjoys the righteous ideas to be spread across media, we also need to accept the existence of fake news in order to understand the root of the problem and how can it be tackled.	
IKED	It has been convincingly demonstrated in WP2 that traditional news is under pressure. A case for algorithmically favouring news media content on social	The rationale should be presented more clearly. An objective to give more space for news across media channels where it is now under-represented seems to make little sense? Or is	The EU and policy-makers. Platforms and stakeholders would have to be consulted with, and also the general public

	media platforms does not, however, transpire from this work as an effective countermeasure.	the objective to promote a combination of information diversity, counteract polarization, support journalism sustainability, or all of these? Perhaps a call should be made to define objectives in such respects and accordingly devise a positive algorithmic response. Contingency measures to manage risks of censorship and unintended consequences would have to be secured.	
CU	WP2/WP4 has the data on this issue (even though the media/non-media categorization is not very sound) WP5 (future studies) has also TF on toxic debate, with several negative scenarios; also TF4 has shown the concern with societal polarization	We don't support the focus on privileging news media, but we support the idea of limiting visibility of negative/polarizing news. The proposal leads to dis-privileging ordinary voices, and work against the participatory promise of social media. Moreover, it is assumed that news organizations will stop competing with each for clicks. This is unlikely happen in a (media) capitalist order, with media oligopolies and the interconnection of media and politics. We do believe there is a need for platform self-regulation to ensure visibility to more	Platforms

	constructive voices.	

Recommendation	**5.5 Planning of more tailored literacy campaign**
Abstract	(1) Although bottom-up approaches yield more thorough and enduring and solutions, innovative structural proposals may in some cases serve as a game-changer. Therefore, experimentation in design of the interaction on platforms – with the hope to come up with game-changing innovations – can be a front into which we may recommend putting more effort. What does it mean to focus on the design of the interaction (or debate) on platformed media? An example can be illustrative. This specific recommendation builds on the idea that, not just the whole design, but also the starting points and positions of a particular discussion are consequential. Starting points – or original posts in general – thus may be distinguished in accordance with where they come from: debates initiated by trusted civil society organisations such as the Amnesty International, Corporate Watch, and World Health Organisation may have a different status than a debate initiated by a personal account. The rationale in distinguishing the personal and institutional accounts is that the institutions have a certain conduct that is monitored by their membership and audience, and they have a peculiar accountability that individual users don't have. (2) A new type of education could involve the formal obligation in primary and secondary education for the inclusion in the curricula of a critical pedagogy of the citizen, adjusted to the level of education. It could concern either the introduction of specialized and dedicated courses and activities or the redesigning of existing courses to bring in the spirit and practice of citizenship and democracy. Also, in tertiary education, the study programmes may include a range of elective courses – theoretical, practice-based or apprenticeships-– that involve competences of active citizenship, designed to serve the needs and requirements of their fields of study. The formal inclusion of citizenship education to programmes of study may be connected to the evaluation and accreditation of these programmes, but also to the education and training of teachers and professors.

	According to the latest Eurydice report on citizenship education in Europe (European Commission, 2018), the following competence areas (i.e., areas of knowledge, skills and attitudes) need to be included in citizenship education: "Interacting effectively and constructively with others, including personal development (self-confidence, personal responsibility and empathy); communicating and listening; and cooperating with others. Thinking critically, including reasoning and analysis, media literacy, knowledge and discovery, and use of sources. Acting in a socially responsible manner, including respect for the principle of justice and human rights; respect for other human beings, for other cultures and other religions; developing a sense of belonging; and understanding issues relating to the environment and sustainability. Acting democratically, including respect for democratic principles; knowledge and understanding of political processes, institutions and organisations; and knowledge and understanding of fundamental social and political concepts" (p. 6). (3) We suggest the Aggregation of Media and Information Literacy (MIL) and Peace Education (including peace building / conflict transformation approaches), which implies cross-fertilizing the existing efforts in relationship to both formal/informal educational fields. Arguably, there still exists a knowledge gap in how these two fields intersect, which necessitates the creation of or more centers of expertise at a European level, and impulse funding for additional research. Moreover, the amply existing expertise in both fields should be stimulated to engage in dialogues with each other, resulting also in more practical outcomes—at a European level—such as the identification and stimulation of best/good practices of this aggregation, the exchange of teaching experiences on this aggregation and the development of course models (and course ware) with this aggregation, at different educational levels.
WP	WP2 and WP5

Proposed by	(1) Mehmet Ali Üzelgün (ISCTE)
	(2) Vaia Doudaki (CU)
	(3) Nico Carpentier (CU)

Partners	Evidence-Based?	What to do with it?	Who
	In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	Reasons for including or not including it; partners' opinion and recommendations	To whom the recommendation is destined?
IULM			
HBI		ad (1) Where do you see a problem in distinguishing personal and institutional accounts? Are you suggesting verification of accounts? An external org that grants the status of 'trusted civil society organisation' to some accounts but not to others? The WHO may be trustworthy to you and me, but to others it's a UN org bought by Bill Gates in order to gain	

		world control. Will someone decide for all what is trustworthy?	
NBU	WP2, WP5 results	Yes, it is very well described above	Different EU educational organizations
UOC	Jim: Not sure Silvia: There are research projects (such as Digital Social Education, in Spain) that address how, from areas of non-regulated education, work can be done in favor of media education.	Jim: (1) Is an interesting and good idea/example. However, I believe that promoting "institutional content" (if that is partly the idea) would create controversy and increased polarization. However, as additional information provided it sounds interesting. (2) is a "huge" recommendation that seems to go far beyond what we study in the EUMEPLAT project, for good and bad. For (3) I have little specific knowledge but combining knowledge and assessing gaps across projects is a good idea in general. Silvia: As Jim comments, an invasive and partial vision can be generated and produce rejection, but, well managed, it can be another resource to combat issues such as misinformation or hate speech.	Jim: Policy makers, education Silvia: It is a broad recommendation but it can be developed hand in hand not only with political agents but also with educational institutions, media and other areas such as those related to social educators.

UGent			
Bilkent			
ISCTE			
NKUA		5. 5. (1). Not sure we understand the rationale behind this discrimination. Is it implied that institutional accounts cannot trigger polarizing posts because they are generally seen as trustworthy? If so, the covid-19 vaccination debate on social media provides evidence that this is not the case. Even neutral announcements by medical institutions can be reposted by users sharing different views with an intent to distort their factuality. This recommendation put emphasis on the design of the interaction (or debate) on platformed media. Instead the real problem is how social media platforms are designed to	

		interact with users, opening again the discussion of algorithmic selection of polarizing content, etc. 5.5.2. and 5.5.3 are of use but throughout this document we highlight in different recommendations the role of media literacy etc… All these recommendations that have in common the better education of the users and the promotion of societal inclusivity should be merged under a more concrete proposal, probably with different subsections.	
UniVe		The topic falls under media literacy (and algorithmic literacy), so it is better to cluster this recommendation with 5.1	
IKED	While generally supported by EUMEPLAT work, alternative models for fostering critical thinking, effective interaction, and social responsibility have not been compared and evaluated.	In favor of inclusion, the first recommendation to experiment with the design of interactions on platformed media could be justified by its potential to yield game-changing innovations, with evidence-driven insights into user engagement and algorithmic impacts.	1) Executives and decision-makers of social media platforms, regulatory authorities overseeing digital communication, and researchers focusing on online interactions. 2) Educational policymakers, administrators, and curriculum developers at primary, secondary, and

		The second recommendation for citizenship education offers potential benefits in fostering critical thinking and responsible citizenship but may face challenges in curriculum integration and resource allocation. The third recommendation, advocating for the aggregation of MIL and Peace Education, is generally attractive.	tertiary levels, and also teacher training institutions and organisations responsible for accreditation and evaluation of educational programs. 3) Educational institutions, researchers in media and peace studies, and regulatory bodies involved in education policy.
CU	The cluster of 51, 552 and 553 is grounded in the future analysis of WP5, as part of a backcasting method (avoiding threats in future scenarios): -AlgoLit was one scenario from TF2 -Peace education comes from the cultural change scenario in TF4 (and avoiding intensification of conflict) -Critical pedagogy comes from a cluster of scenarios in TF1 WP2 features a strong focus on toxic	(a) We propose grouping 5.1, 5.5 (2) and 5.5 (3) under one recommendations header, namely "Extending MIL", with three proposals / action. This cluster needs an extra introduction. (b) R5.5 (1) is a bit unclear, but it has nothing to do with media literacy. It has to be a separate recommendation, if it's kept. But it should be clarified. We understand that it's a call for more (participatory) experiments with platform design.	EU, UNESCO, and national educational bodies The AVMSD includes the request for member state to develop MIL, but also the connection with other educational fields needs to be strengthened. Also the Media Literacy Expert Group and Eurydice could be asked to develop further ideas on these intersections. For UNESCO: https://www.unesco.org/en/media-information-literacy For EU: https://digital-strategy.ec.europa.eu/en/policies/media-literacy

		Eurydice (advisory expert/research body conducting research for the European Commission): https://eurydice.eacea.ec.europa.eu/
	debate culture, which feeds into the need for more	

Recommendation	**5.6 Monitor the activities beyond the institutional domain**
Abstract	(1) Regulation of the role of citizens in journalism production and dissemination through platforms – namely defining what is "fair use", clarifying copyright issues, defining eventual financial retribution for citizens collaboration in professional journalism production – should be closely observed and discussed, as some policymaking intervention may be required in the near future.

Policymakers should recognize the interactive potential for enhancing public life and the capability of destroying the journalists' monopoly over the news making process brought by the Internet. It is mandatory to accept that citizens have an active presence in platforms, and that journalism standards and content can be an important part of the citizenship presence and public expression. On the platforms, citizens participate in everyday politics and community storytelling networks.

(2) There are several similarities when it comes to the themes of the posts within each of the topics of gender and migration, suggesting that there may exist some European ways in how to fight discrimination and stereotypes on social media. Some similarities for gender are country observations concerned with the representation of social movements on social media to support gender to promote awareness, empathy and social change. Another common best practice is to give social media coverage and generate buzz in support of women's rights and LBGTQ+ as well as to promote empathy and education on gender issues. This may include sharing personal stories to encourage greater understanding and awareness of gender equality. Following the instructions for the country observations of migration, many similarities were found from examples of best practice posts giving voice to |

	immigrants – letting immigrants telling their own story. Moreover, stories of individuals, groups, or families, rather than picturing "immigrants" as a whole were commonly found across almost all countries. Finally, alternative media activists' projects, which suggest the need of bridging together institutional and bottom-up initiatives, as they raise awareness of the importance and seriousness of the migration issue. Platformization and its accompanied "democratization" of news and media content has had many negative consequences, most pronounced by the vast creation and spreading of misinformation. However, a more positive view on platformization is provided in this document showing the existence and potential for good practices in fighting discrimination and stereotypes online.
WP	WP2 and WP4
Proposed by	(1) Cláudia Álvares, Miguel Crespo, and José Moreno (ISCTE) (2) Jim Ingebretsen Carlson and Francisco Lupíañez-Villanueva (UOC)

Partners	Evidence-Based?	What to do with it?	Who
	In terms of grounded approach, on which data or evidence do you think this would be sustained and legitimated?	Reasons for including or not including it; partners' opinion and recommendations	To whom the recommendation is destined?

IULM			
HBI		(1) seems to address copyright issues that arise when citizens work together with professional journalist. We don't have "fair use" in continental European copyright law, but explicit exceptions and limitations. Those most pertinent to journalism and freedom of speech have been significantly strengthened, i.e. made mandatory, enforceable in court, in the context of sharing platforms in the latest copyright directive (Art 17 Pt 7 DSMD). Please specify which of them you see in need of clarification. "defining eventual financial retribution for citizens". You seem to have a concrete scenario in mind. Can you give a concrete example for a citizen suffering retribution for working with a journalist? For copyright infringement? "as some policymaking intervention may be required in the near future." That makes it sound very mysterious: 'We have seen the future that will reveal itself to you mortals shortly.'	

| | | Does anyone doubt "that citizens have an active presence in platforms"? For whom should it be mandatory to accept that obvious fact?

Please clarify what the problem is you are trying to solve and what the recommendation is.

(2) that reads like cut-and-paste from research findings. What's the recommendation? What's "this document" in the last sentence? | |
|---|---|---|---|
| NBU | | | |
| UOC | Jim: WP4 | Jim: (1) If a problem it seems like a concrete and useful recommendation.

(2) Cut-out the last part. This should be re-framed as "promote posts fighting stereotypes and discrimination on social media" or something similar. | Jim: Policy makers |
| UGent | | | |

Bilkent			
ISCTE			
NKUA		(1) It is indeed an accepted fact the role of users in producing content/ it is called user generated content, producers/ citizen journalism etc. The issue of users' compensation is not something that can be addressed through horizontal measures. Sometimes users don't wish for "recognition" for the help they provide, but journalistic coverage of their problems so to be addressed by the government. For example, a very successful radio show in Greece, was built in this logic, where citizens informed the journalists about problems encountered at community level with the aspiration that journalists will look into these problems and make them more visible to the public authorities. So, in case users provide any sort of help to media professionals it should be defined ad hoc among the two parts what is the	

		kind of compensation they wish for. (2) What is the actual recommendation?	
UniVe		In terms of Gender and Migration related issues, 5.3 and 5.4 covers the material in terms of positive algorithmic bias and inclusion. So this part seems a bit redundant.	
IKED	The description of citizen vs. professional journalism reflects EUMEPLAT findings, e.g., in WP2, but the reasoning is very general. The point about common EU responses to migration and gender posts, etc., is vague and not underpinned in the work that has been undertaken	Agreed that copyright concerns and compensation issues arise in the present context. This is all the more so with AI though and the present text does not appear up-to-date. The reasoning regarding gender and migration is a mess. We are lacking a clearly formulated policy rationale as well as a valid recommendation.	
CU	WP2 has a deliverable on citizen journalism (D2.4)	(1) Proper compensation for non-professional media contributions is a good idea. Still, the recommendation mixes several levels,	EU regulation, together with national bodies and platforms

		and maybe the focus should be on this compensation, less on maintaining copyright.	
		(2) the element on "social movements on social media to support gender to promote awareness" is covered by recommendation 5.3.	
		(3) the buzz argument is at least partially covered by recommendation 5.4 (positive news); moreover, this part is more the legitimation for R5.4, than a recommendation in its own.	
		(4) the alternative media argument overlaps with recommendation 5.3 on Europeanization from below.	
		In short: we propose to focus on the compensation on non-professional producers, which may be integrated with the discussion independent film producer	

Get in touch

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