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PART 1 / SPECIAL ISSUE:

NEW EUROPEAN MEDIA

AND PLATFORM POLICY:

IMPLICATIONS FOR THE

POLITICAL ECONOMY

OF NEWS

INTRODUCTION TO THE SPECIAL ISSUE: NEW EUROPEAN MEDIA AND PLATFORM POLICY: IMPLICATIONS FOR THE POLITICAL ECONOMY OF NEWS

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For more than four decades, since the late 1980s, European media policy has been exclusively audio-visual policy. What started out with the "Television Without Frontiers" directive in 1989, along with the MEDIA programme in various editions, experienced significant acceleration in the 2020s, when hegemonic control by digital media platforms over the media sector became increasingly evident and difficult to ignore. The European Union has made a significant return to the forefront of media policy discourse through the adoption of a comprehensive regulatory package, consisting of the *General Data Protection Regulation* (GDPR), the *Digital Services Act* (DSA), the *Digital Markets Act* (DMA), the *AI Act* and the *Media Freedom Act* (EMFA), among others.

In order to better understand the implications of this policy package, we focused the call for this special issue on an overarching area of longstanding interest in communication studies, which integrates the objectives of two European research projects. The Horizon project ReMeD, *Resilient Media for Democracy in the Digital Age*, aims at addressing challenges to the relationship between media and democracy, with a specific focus on the interactions between citizens, professional journalists, and alternative media content producers in technologically mediated configurations. EurOMo, *Euromedia Ownership Monitor*, creates a database and an index covering all 27 EU member countries, on ownership of opinion-shaping news media.

Both research projects address the delicate balance between ownership of media and editorial freedom. Seen from the perspective of critical political economy – an approach chosen by authors of this special issue – power materializes not only in control over media structures but also over resources and staff decisions. We argued in the call for this special issue that ownership matters, whether public or private, family-owned or publicly traded.

We asked for contributions addressing the following questions: To what extent are changes instigated by the EU media policy package impacting the political economy of news production, distribution and consumption? Should we expect changes in EU countries in terms of ownership concentration, funding of public interest content or the balance between profit and non-profit news production? Does the new regulatory framework favour the promotion of public interest content? Should we expect EU influence in middle powers, which are often "policy followers", shaping their regulation and political economy of news as well?

We were aware that these are difficult questions. From the many proposals we received, we selected five for publication that either best reflected the state of the art in research and/or contributed best with findings from original research. We were happy and satisfied to realize that the call motivated scholars from even beyond Europe to contribute to the debate.

The first three contributions address a specific topic in greater detail. Konrad Bleyer-Simon looks at fact-checking institutions in Europe and carves out their relevance

and importance in shaping the public sphere. The process of fact-checking, which is understood to involve the verification of facts, statistics, and quotations, has been established within the European Union in an attempt to detoxify the public debate. Bleyer-Simon models fact-checking along Bourdieu's concept as a field in its own right. His interviews with representatives of fact-checking organizations revealed that there is enough symbolic capital to "influence the neighboring fields of policymaking and platform operation." However, recent developments since the second inauguration of President Trump have created existential challenges to fact-checking institutions, given the obedience of large US platforms in discontinuing their support for them.

The second contribution, by Bruno Lefèvre, Aina Errando, Adelaida Afilipoaie, Heritiana Ranaivoson and Louis Wiart, attempts to bridge the gap between regulation of Artificial Intelligence (AI) and ethical considerations. Based on the analysis of key documents and 41 interviews with media professionals and regulatory experts across French-speaking Belgium, France and Spain, they establish that the discourse within media organizations on the ethics of AI is limited and that clear and actionable regulatory guidelines for the use of AI-driven news content are largely missing. Therefore, the authors propose the establishment of a comprehensive and robust oversight mechanism as a concluding recommendation.

Michael Pakvis, Tim Raats and Catalina Iordache focus their contribution on the delicate challenge of defining the key concept of impartiality for public service media. By comparing policy documents as well as editorial guidelines of three leading public service media in the UK (BBC), Ireland (RTÉ) and Belgium (VRT), they conclude that clear definitions are lacking. Although impartiality can be considered a key value alongside fairness, accuracy, independence, and accountability, the authors recommend avoiding strict definitions. They argue that "increasing political emphasis on impartiality paradoxically risks undermining the editorial independence it seeks to protect."

The contribution by Lizete Barbosa da Nóbrega and Rodrigo Pelegrini Ratier provides this special issue with a view from outside Europe. The authors undertake a critically examination of the so-called "Brussels effect", a term used to describe the impact of the digital media and platform regulation package beyond Europe. Obviously, Brazilian legislators closely monitor regulatory initiatives and their outcomes within the European Union and discern clear indications of cross-fertilisation. Nevertheless, endeavours to replicate European legislation in the Brazilian context often prove unsuccessful because of the ideological composition of the Brazilian parliament on the one hand, and of the prioritization of other pressing contemporary issues on the other. The "Brussels effect" can thus be regarded as limited.

Finally, Ana Tešić describes the process of the evolution of media ownership regulation in Croatia. She starts out by discussing the concepts of pluralism and diversity in the scholarly debate in order to establish whether Croatian ownership legislation has supported the promotion of media pluralism over time. She concludes that, at the end of

the long journey, Croatia managed to release legislation that provides information about all legal and natural persons who have direct or indirect ownership of stocks or shares in the capital.

We would like to express our gratitude not only to the contributors to this special issue, but in particular to the editor-in-chief of *Media Studies/Medijske studije*, Marijana Grbeša Zenzerović (University of Zagreb), for this editorial opportunity and her valuable support along the entire production chain of this special issue.

FACT-CHECKING AS A POLICY FOCUS IN THE EU

Konrad Bleyer-Simon

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ABSTRACT *Fact-checking is a popular journalistic format that is widely used across the European Union to react to disinformation and other false narratives spreading both in social networks and traditional media. To foster its uptake, the European Commission has included the support of fact-checking organizations, as well as a request for the integration of their services in online platform content moderation, in a number of its policy documents. The watchdog activities of fact-checkers thereby become part of the EU's policy focus, allowing these organizations to shape policies – albeit not without certain impediments, given that many fact-checkers rely on funding from technology companies and the European institutions. The aim of this paper is to better understand the European fact-checking landscape and to identify in what ways these organizations interact with EU policymakers, the ways EU institutions and the fact-checking community may influence each other, as well as the power dynamics between fact-checkers and online platforms.*

KEYWORDS

FACT-CHECKING, EUROPEAN UNION, PLATFORM GOVERNANCE, SOCIAL MEDIA, DISINFORMATION

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INTRODUCTION

In the late 2010s and early 2020s, fact-checking, a technique used to assess the quality of journalistic work, has emerged as a popular journalistic format – and even more than that, a service provided by established private and public service media, news agencies, news start-ups, as well as newly emerging, dedicated fact-checking organizations. Fact-checkers regularly monitor the integrity of the information environment – especially its online segments – and rectify untrue narratives that can pose harm to society's well-being, might compromise political processes or endanger responses to natural disasters or public health emergencies.

The rationale for the prominence of such activities stems from the pivotal role disinformation plays in public policy discussions. The term refers to harmful content that is distributed across a multitude of channels, with a possibility of undermining political processes or posing threats to a democratic society. Following the definition of Wardle and Derakhshan (2017), disinformation is considered to be *intentionally spread* harmful and misleading content. At the same time, it has to be acknowledged that anti-disinformation action, as defined in the EU's policy documents, includes additional forms of content, such as misinformation, which Wardle and Derakhshan (2017) define, in contrast to disinformation, as false or misleading content that is spread *without the intent* to harm, as well as a range of tactics and techniques used to mislead audiences. While there is still no scientific consensus about the extent and kinds of harm that the sharing of false and misleading content can cause (see Altay et al. 2023), widespread fears about the integrity of elections (see, among others, Allcott & Gentzkow, 2017; Bader, 2018; Baptista & Gradim, 2022), manipulations of public opinion in the context of wars and crises (see Bachmann et al., 2019; European Commission, 2023a; Yablokov, 2022) and the effectiveness of public health measures (Springer & Özdemir, 2022) justify the increased attention of policymakers. The term “infodemic” (The Lancet Infectious Diseases, 2020) became part of our vocabulary when the global pandemic seemingly accelerated the spread of misleading or fabricated harmful content.

Fact-checking is “a fact-based methodology for evaluating policy claims” (Mena 2018), which involves the verification of facts, statistics, quotes, and other information, involving a detailed examination of primary and secondary sources (Amazeen, 2015; Graves, 2016). Despite some limitations (Nyhan & Reifler, 2010; Thorson, 2016; Jarman 2016), it has become a widely used tool to limit the spread of disinformation and promote a more informed public discourse (Weeks 2015; Pingree et al., 2014; Graves 2016). Although it is hardly a stand-alone solution (Caulfield, 2020), studies have found that fact-checking can reduce the spread of false information and incentivize politicians and other public figures to communicate responsibly (Wood & Porter 2018; Nyhan & Reifler, 2015). As such, the European Commission made fact-checking a key component of its European approach to disinformation (see among others COM/2018/236). This can be seen, for example, in the case of the *Code of Practice* (now *Code of Conduct*) *on Disinformation* (European Commission, 2022a), which assigns numerous commitments to its signatories – among them very large online platforms, such as YouTube, Facebook, or TikTok – to contribute to

online audiences' resilience towards information manipulation. One of its commitments is called "Empowering the Fact-Checking Community", which asks social media companies, among other things, to provide fact-checking organizations with transparent funding, as well as to integrate fact-checkers' insights into their services. In addition to the emphasis on the role of fact-checking in the previously mentioned soft law instrument, European institutions also provided monetary support for fact-checking activities, among other things, by creating and funding the European Digital Media Observatory (EDMO) and its regional hubs, providing funding to the European Fact-Checking Standards Network, and publishing dedicated grants for fact-checking organizations (see, for example, European Commission, 2022b; European Parliament, 2024a).

METHODOLOGY AND ANALYTICAL FRAMEWORK

The analysis is based on a review of the existing literature, European policy documents, as well as a set of semi-structured interviews with people we considered key players in the European fact-checking landscape. Between August 2024 and January 2025, we conducted 19 interviews, mainly with representatives of fact-checking organizations, but also members of the policy community. We were aiming to speak with the representatives of those fact-checking organizations that were most active in European projects, such as the European Digital Media Observatory and the European Fact-Checking Standards Network, but also with fact-checkers who were not, or were only loosely, connected to such projects, in order to understand the motivations of both those that engage with the European Commission and those that do not. Most interviewees agreed to be quoted, while three people were anonymized, as their organizations only allowed official spokespeople to speak on the record. We referred to these anonymous interviewees by the gender-neutral pronoun "they". The interviews lasted, on average, 70 minutes, and were, in turn, analyzed with the grounded theory method. The texts were first approached through open coding, which allowed for the development of initial concepts, followed by categorizing the data through substantive categories that helped better understand the perceived positions of interviewed actors.

Interviewees were asked about their personal background, their experience with the craft of fact-checking, the perceived role of fact-checkers in the journalistic and the policy field, the funding and sustainability of fact-checking organizations, ways to maintain independence from state and private actors, as well as the possible advantages and disadvantages of international cooperation. Based on the interviews, we also aim to understand the extent of autonomy the relatively new fact-checking organizations enjoy in a field that leaves them dependent on the holders of economic capital (European institutions, states, online platforms), and to what extent their cultural and social capital, as well as their legitimacy, or the lack thereof, as described by Champagne (2005), allow them to shape the functioning of their own and other fields (see Bourdieu, 2005).

According to Bourdieu, the field of journalism is a "microcosm" where actors cooperate and compete to produce content; the rules of this microcosm are "comparable to a field

of physical forces" (Bourdieu, 2005, p. 30). We argue that fact-checking can be considered a similar field to that of journalism, or a relatively autonomous sub-field of it, which is shaped by internal and external forces, but can also try to influence neighboring fields, namely those of policymaking and the operation of online platforms. The actors in the field of fact-checking possess different forms of capital that determine their freedoms and abilities. While *economic capital* refers to the ownership of material resources, *cultural capital* incorporates (academic) education and general knowledge, and *social capital* refers to social connections and networks within a group. Bourdieu argues that these categories are not fixed, with time they can be converted or transformed into each other. He states that cultural and social capital become symbolic capital "once they are perceived and recognized as legitimate" (Bourdieu, 1986, p. 4). Champagne (2005) refers to symbolic capital as the legitimacy of a media outlet – this capital can be considered more valuable than just the sum of its parts, as it establishes the standing of an organization inside and outside of its community. Fact-checkers bring first and foremost cultural capital to the table, as their familiarity with journalistic research methods allows them to effectively verify content, while their commitment to ethical codes and journalistic standards allows them to be perceived as unbiased agents that can conduct an objective assessment of the veracity of content. At the same time, the increasing internationalization of fact-checking and cooperation in groups of fact-checking organizations can be considered a form of *social capital*, that visibly increased over the past years and became a means to facilitate an effective exchange of views inside the community but also across other players involved in platform policy. Finally, *economic capital* means the revenues generated by fact-checkers, which includes funding that was made available to a large part by technology companies as well as the European Commission.

Actors in a field of cultural production, such as that of journalism or fact-checking can, at times, influence the happenings of fields that are considered more dominant. Bourdieu's prime example is the French writer Émile Zola, who held his government to account for falsely convicting the officer Alfred Dreyfus of treason in an open letter published in the newspaper *L'Aurore* in 1898. With this letter, he entered the field of politics to influence its inner functioning without becoming a politician himself (Bourdieu, 2005, p. 46). While Zola is seen as a successful agent, to a large part due to the autonomy provided by the high standing of literature and journalism at the time, Bourdieu cautions that in the late 20th century, the journalistic field had low autonomy (Bourdieu, 2005, p. 41-43). Similarly to Zola, fact-checkers can try to enter the fields of policymaking and platform governance to influence certain aspects of online platform policy, despite the fact that the fact-checking field's economic capital largely stems from those fields. They can do so because the widely used term "platform governance" refers to an evolution of regulation, in which a range of new actors participate in the shaping and enforcement of rules, including private companies and civil society actors (Flew, 2021). As the insights of interviews will show, fact-checkers are seen as part of this "civil society" that is given a chance to shape the ways in which regulation evolves. The subsequent analysis demonstrates how interview findings reveal fact-checkers leveraging the EU policy framework to build this "symbolic capital".

RESULTS: THE POLICY LANDSCAPE AND FACT-CHECKING INITIATIVES

The EU approach on disinformation

The European Union has been designing policies to tackle disinformation for the last decade, initially emphasizing safeguarding fundamental rights while tackling disinformation. It had been advocating for a European approach in order to avoid a fragmented European policy landscape in light of a border-crossing problem (European Commission, 2018a; Nenadić, 2019). The EU's approach to tackling, in particular online, disinformation rests on the notion that legal content, even if considered harmful, "is generally protected by freedom of expression and needs to be addressed differently than illegal content" (European Commission, 2018b, p. 1). The comprehensive approach on the EU level started with the establishment of the High-Level Expert Group on Fake News and Online Disinformation (HLEG). This initiative enabled discussion between scholars, the industry, civil society, and policymakers, with the aim of defining the path towards European policy initiatives to deal with the threat of disinformation. In its March 2018 report (HLEG, 2018), the group advocated for a multidimensional approach that emphasized the transparency of online news production, the health and diversity of news media markets, the importance of media literacy measures, recommended that online platforms develop tools that empower their users, and asked for more research on disinformation. The document already asked online platforms to support the work of fact-checkers and to rely on their expertise when mitigating the disinformation challenges but did not highlight such organizations in its dedicated recommendation section at that time.

The following month, the European Commission communication *Tackling online disinformation: a European Approach* was published, ascribing a key role to fact-checkers in "verifying and assessing the credibility of content" but also highlighted their ability to "analyse the sources and processes of information creation and dissemination". The communication also mentioned that the Commission will support the creation of an independent fact-checking network, and to establish a database on fact-checks (European Commission, 2018b). Another important policy document, the European Commission's *Action Plan against Disinformation* was published in the same year, which assigned great value to facilitative approaches that involve co-operations with tech companies and civil society. The action plan emphasized in its pillars that 1) the EU should increase its capabilities to detect disinformation, 2) strengthen its responses (for example, through the establishment of a rapid alert system), 3) mobilize the private sector to take action against disinformation, and 4) raise awareness in society (see also Abbamonte & Gori, 2023, p. 139-140). The last pillar included a recommended action for EU member states to foster the creation of independent fact-checking teams.

Also in 2018, the self-regulatory Code of Practice on Disinformation (CoP) (European Commission, 2018c) was passed, ahead of the following year's European Parliament elections, with the aim of limiting the spread of disinformation in the EU. As part of this ground-breaking effort, some of the largest online platforms committed to obligations

that were otherwise not required from them by law: they promised to prevent purveyors of disinformation from generating revenues through their services, limit the use of bots, improve the transparency of political advertising, while at the same time empowering platform users and researchers. However, this first version of the CoP assigned only a limited role to the fact-checkers, as part of the actions envisioned by the broader research community.

The spread of disinformation during the COVID-19 pandemic has increased the demand for fact-checked information, but, in this context, the Code of Practice turned out to have limited impact due to a lack of compliance and oversight. The Commission communication *Tackling COVID-19 disinformation: getting the facts right* (European Commission, 2020a) and the Commission's *Guidance on Strengthening the Code of Practice on Disinformation* (European Commission, 2021) have both highlighted the greater need for increased support to fact-checking. In 2022, a new *Strengthened Code of Practice on Disinformation* (European Commission, 2022a) was published to address some of the problems experienced during the first iteration of this self-regulatory exercise. It included *clear* metrics and monitoring mechanisms. The new text also included a set of commitments that specifically focus on fact-checkers, under the heading of 'Empowering the Fact-Checking Community'. Online platforms were recommended to cooperate with fact-checking organizations, integrate fact-checks in their services and enable fact-checkers' access to relevant information. The Strengthened Code had a broader group of signatories than its predecessor – among them also fact-checking organizations who committed "to operate on the basis of strict ethical and transparency rules, and to protect their independence". Its text also clarified that the focus of the EU's anti-disinformation policy should be broader than just intentionally spread misleading content: measures addressing Disinformation (with a capital D) should take into consideration misinformation and a range of other information disorders as well.

While, at the time of the research, the Code of Practice itself is only a self-regulatory instrument, in February 2025, it was adopted as a co-regulatory code of conduct under the Digital Services Act (DSA) (European Commission, 2025), thereby serving as a guidance for platforms' mandatory risk mitigation efforts under Arts. 34 and 35 (European Commission, 2022c). Although not specifically disinformation-focused, the DSA is a regulation that establishes a framework for transparency and clear accountability on online platforms, especially those that are referred to as "very large online platforms" (VLOPs),¹ such as X, which is not a signatory anymore to the CoP, or the services operated by Alphabet (Google) and Meta (Facebook). The DSA, considers disinformation to be one of the systemic risks that platforms need to identify and mitigate, calls for a code of conduct for online advertising, and requires VLOPs to undergo a yearly audit on their own expenses. Fact-checkers are not mentioned in the DSA, but they can be considered possible actors that help platforms identify risks to the integrity of the information environment. This aspect has been highlighted in the Commission's guidelines to mitigate systemic risks, which were published ahead of the 2024 European elections (European Commission, 2024a). This communication reiterates the desirability of platforms' cooperation with

¹ As well as "very large online search engines" or VLOSEs.

fact-checking organizations and recommends adding fact-check labels or deprioritizing content that such organizations found to be unreliable.

Additional protections of the online information environment in the EU can be found, among others, in the *Digital Markets Act*, the *Artificial Intelligence Act*, and the *Regulation on the transparency and targeting of political advertising* (European Commission, 2022d, 2024d, 2024e). These regulatory texts aim at safeguarding the integrity of information landscapes, either by preventing anti-competitive behavior, prohibiting certain harmful behaviors and introducing new transparency measures. An explicit mention of fact-checkers can be found in the *European Media Freedom Act* (EMFA) (European Commission, 2024b), a regulation that protects the independence of news media, which sees a role for fact-checking organizations in identifying which media outlets could receive preferential treatment by content moderators, according to Art. 18 of the regulation.

Apart from legislation, the European institutions also provided financial and organizational support to fact-checking organizations. As an outcome of the Commission communications, the Social Observatory for Disinformation and Social Media Analysis (SOMA) was launched in 2018, with the aim of bringing together organizations interested in mapping disinformation, among them fact-checking organizations, as well as creating a repository of fact-checks. As a follow-up, in 2020, the European Digital Media Observatory (EDMO) was established as a permanent structure to support the work done under the CoP with the involvement of media literacy, fact-checking and research organizations – by 2022, it had established local hubs that represented all EU member states, and, at the time of writing, had a network of 53 fact-checking organizations that covered all EU member states (Edmo.eu, 2025).

In order to contribute to the funding of fact-checking organizations, grants were made available by the European Commission and the European Parliament. Apart from funding projects to monitor disinformation and verify content (see, for example, European Commission, 2022b; European Parliament, 2024a), they also enabled the establishment of the European Fact-Checking Standards Network (EFCSN), which operates as a network and representation of fact-checking organizations in the EU and its neighborhood (European Commission, 2021). Anti-disinformation measures are also part of the EU's foreign policy. Untrue narratives are addressed as part of the measures against FIMI (Foreign Information Manipulation and Interference), which refers to a wide range of manipulative efforts by foreign governments, and identifies its targets not based on content but the behavior of actors, the so-called "tactics, techniques and procedures" (Hénin, 2023). The next sections examine the insights collected through interviews to understand how relevant actors see the role of this policy landscape in the work of fact-checkers.

The development of European fact-checking

The organizations involved in fact-checking are very different in size, activities, and operations. The number of their employees can be somewhere between a handful and more than a hundred. Some operate as departments of private media outlets, public service media or news agencies, while others are standalone outlets that consider fact-

checking their main activity. Graves and Cherubini (2016) observed that fact-checkers are more likely to be non-profit start-ups in Southern and Eastern Europe. Some interviewees also mentioned that their organization had dedicated departments working on media literacy projects or developing software to help verify content. In certain cases, training activities for journalists were also considered important. All interviewees saw fact-checking as a form of journalistic work – or a genre of it – similar to investigative journalism. Nevertheless, not all interviewees had a journalistic identity. This includes some of those with a non-journalistic background and those working on tasks other than content verification. Interviewees mentioned that the main characteristics of the fact-checking profession were the rigorous methodology of verification and the strict rules that organizations follow. Many of them highlighted that the community of fact-checkers was highly professionalized, despite the fact that most of the organizations were established only in the last decade. At the time of the interviews, many European fact-checkers considered themselves to be part of an international, or at least Europe-wide, community that exchanged best practices, regularly met at conferences and networking events, and often collaborated on shared projects.

The history of fact-checking projects in Europe goes back to the early 2000s (Graves & Cherubini, 2016), but, according to the recollection of interviewees, the focus of the projects of the time was different from the verification of content on social media, as envisioned by the Commission in its communications. The Italian *Pagella Politica* and the Spanish *Maldita* were influenced by the U.S. fact-checking networks that gained prominence around the 2012 election campaign, focusing on verifying statements made by politicians (see Graves, 2016). The Austrian *Medizin Transparent* was set up to correct unfounded medical statements in print media and popular websites (Kerschner, personal communication, November 19, 2024).

The Russian Federation's occupation of Crimea in 2014, the Brexit referendum and the U.S. election campaign of 2016 were seen as wake-up calls, indicating that holding politicians to account alone is not sufficient for fact-checking organizations, since false narratives were spread by multiple accounts on social media. Policymakers, civil society actors, and commentators believed that such content could manipulate public opinion, compromise the outcome of votes, or influence political decision-making (Henkel, 2021; Nitszke, 2022). Multiple incentives contributed to fact-checking organizations becoming involved in the activities related to the so-called “debunking” (verification) of false narratives spreading on social media. Carlos Hernández-Echevarría, Associate Director of *Maldita*, explained it with his organization's interest in reaching the wider society, as the verification of politicians' statements was a topic that was rather consumed by people who were already avid followers of political developments (personal communication, August 26, 2024). The role of the policy field was also evident as interviewees mentioned the European Commission's expression of interest in having a stronger culture of debunking, the example of American fact-checking organizations focusing more on conspiracy theories and online disinformation campaigns, as well as the emerging opportunity to get funded for such exercises by tech companies.

Cooperation played an important role in elevating fact-checkers' symbolic capital. The first collaborative effort in Europe was First Draft's *CrossCheck* project in 2017, ahead of the French presidential election. It brought together 37 media organizations and technology companies to monitor and verify information spreading on social media related to the election campaign. The French news agency AFP (*Agence France-Presse*) was responsible for the editorial workflow of this project and for finalizing the common investigations that were cross-checked by the participating media. AFP has since become one of the biggest fact-checking operations worldwide, with 150 journalists working in 26 languages (Bohner, personal communication, November 27, 2024).

As shown in the previous section, the European Commission's interest began around 2018, with the establishment of the HLEG, as well as a number of policy documents published in the same year. Initially, both the representatives of the European Commission and fact-checking organizations were cautious about collaborating. The Commission did not want fact-checkers to be seen as "an instrument in the hand of the public authorities" (Cesarini, personal communication, December 9, 2024), while Alexios Mantzarlis, who represented the International Fact-Checking Network at the HLEG, was initially not sure whether engagement with the European policy community was helpful or rather detrimental to fact-checkers in Europe. As motivation for his participation in the expert group, he said, "I wanted to make sure that nothing [...] that would have strange consequences on fact-checkers made it into the text" (personal communication, November 8, 2024). One of his fears was that EU institutions would expect from fact-checkers to reiterate the European Commission's messages in their work.

Due to the initial skepticism of some fact-checking projects, a "climate of trust" had to be created, said Paolo Cesarini, then unit leader at the European Commission (personal communication, December 9, 2024). It began with the creation of SOMA in 2018, the first EU project to involve fact-checkers. Cesarini added that, at the time, disinformation policy and platform governance was a new topic in the EU, thus, it was not initially clear what role fact-checkers could play in this policy setting. Still, the policy documents of the Commission already indicated that the insights of fact-checking organizations could be relevant when online platforms took action against disinformation content. The SOMA project was followed two years later by a larger collaborative exercise, called EDMO, which involved Pagella Politica as the coordinator of fact-checking activities. Its task was to create synergies in fact-checking and disinformation communities and to provide data collection and analysis said Paula Gori, Secretary General of EDMO (personal communication, October 30, 2024). Its role became more prominent in the following years. Even at that stage, the creation of a European network of fact-checkers and a repository of fact-checks was high on the the Commission's agenda.

Increased role of the community

The push for a greater role of fact-checkers came with the Commission's communications during the COVID-19 pandemic and the assessment of the impact of the first Code of Practice on Disinformation. "There was an impression that the platforms

did not take into account sufficiently the knowledge generated by fact-checkers”, said Paolo Cesarini (personal communication, December 9, 2024). This became evident in the context of EDMO, where it was shown that fact-checking has a potential to reach wider audiences, as it is either done or covered by news media (Gori, personal communication, October 30, 2024). Thus, the new disinformation policies placed greater emphasis on fact-checkers, including the Strengthened Code of Practice on Disinformation in 2022.

At the same time, a call was published to facilitate the creation of an international fact-checking body (European Commission, 2021), which resulted in the European Fact-Checking Standards Network (EFCSN). Aside from the idea of the network, the policy community gave full ownership to the fact-checkers that formed the winning coalition. “On the specifics, we had zero input from the Commission, so we didn’t have any suggestion whatsoever in terms of how to organize the association internally, [and] what to write in the code [of standards],” said Giovanni Zagni, one of the members of the founding consortium (personal communication, October 23, 2024). The network acts as a representation of its certified members and one of its main objectives is “to ensure that standards are being complied with in the fact checking community”, said Stephan Mündges, Coordinator of the EFCSN (personal communication, September 23, 2024). The Code of Standards includes rules on the transparency of the funding and organizational structure of fact-checking organizations, as well as a robust methodology that members need to follow when doing their work (EFCSN, n.d.). While an international organization with similar standards already existed – the International Fact-Checking Network – it was important for the Commission to foster the creation of a European equivalent. According to interviewees, this was a priority because a European network could foster stronger collaboration between organizations in EU member states, and the European context allowed for the introduction of stricter rules than the ones existed internationally, such as transparency of funding, as European fact-checkers do not have to fear the repercussions of authoritarian governments.

Among interviewees, there was a consensus that the standards of the EFCSN were the most demanding in the profession. In order to become a member, fact-checking organizations need to undergo a review by two experts in the field, who make a detailed assessment on whether the organization in question successfully complies with these criteria. Members consider this an important certification of quality and trustworthiness in an environment in which both journalism and fact-checking are constantly targeted by smear campaigns from illiberal forces. Moreover, the EFCSN, alongside the EU-funded grants and projects that put an emphasis on collaboration between fact-checkers of different countries, has strengthened the international character of fact-checking. Out of our sample, only the representative of the German Volksverpetzer expressed a preference not to participate in international projects or apply for any other form of funding other than donations coming from readers. The outlet’s founder, Thomas Laschyk, justified this with a decision to prioritize fact-check production over grant applications, administrative tasks and coordination with other organizations. He also noted that reader-generated revenue is first and foremost dependent on journalistic output. At the same time, he mentioned that he had attended a number of calls with other German-language fact-

checking organizations, thus being informed about the relevant developments in the community (personal communication, November 20, 2024). This is not the only example in which the EU fact-checking community showed to be influential beyond the highly engaged fact-checkers of EU countries. The EFCSN had 56 members at the time of writing, as well as a group of mentees in its incubator program, a number of which were from the EU neighboring countries. Moreover, many interviewees viewed the standard-setting role of the fact-checking community as one that can have an effect on the broader journalistic field – as fact-checkers highlighted a significant deterioration of journalistic standards in their national contexts.

Fact-checkers' influence on the policy field

Despite being a journalistic activity, some interviewees from the policy community – and also one of the fact-checkers – considered fact-checking organizations to be part of “civil society”. By this, they referred to the role these organizations play within the disinformation policy landscape: as part of a wider community of private, mainly non-profit, organizations that ensure the integrity of the policymaking process. In the European Commission's work outside of the EU, the term “media communities” is also used as a value-neutral term in environments in which governments are hostile towards activists, journalists or fact-checkers (Anonymous, personal communication, November 19, 2024).

Looking at fact-checkers as part of a broader civil society, rather than simply as journalism practitioners, becomes especially relevant if we take into consideration that many representatives of fact-checking organizations are also becoming vocal in policy discussions. Interviewees mentioned many different activities that could fall into the category of policy-work. These can be grouped into three main categories: a) contribution to the execution of policies on online platforms; b) assessment of narratives and disinformation trends to inform policy; and c) shaping of policies that have an impact on the work of fact-checkers.

Work with platforms started through the third-party fact-checking program of Meta (see Bélair-Gagnon et al., 2023). At the time of the interviews, many interviewees also reported working for TikTok. Their task was to fact-check pieces of content, so that platforms could take appropriate action. While platform governance includes the removal or (de-)amplification of content (Reviglio et al., 2025), fact-checkers see the use of their work by platforms not as a content moderation effort. As Giovanni Zagni explained, “the aim of fact checking is not so much to remove, censor, cancel, control content as it is to provide context to the reader” (personal communication, October 23, 2024). This work with platforms will be discussed in more detail in the section addressing power relations between fact-checkers and platforms.

Participating in the work of the European Digital Media Observatory (EDMO) meant that fact-checking organizations worked on a regular assessment of the most common false narratives circulating in Europe – with a special focus on mis- and disinformation spreading ahead of elections. Bastien Carniel also sees a role in “observing compliance

with EU and self-regulation” – an example is the development and testing of “structural indicators” (Nenadić et al., 2024). These indicators help assess how impactful the Code of Practice (CoP) has been when it comes to limiting the spread of disinformation. The data and methodologies used by fact-checkers, and their methodology employed to determine whether a piece of content can be considered mis- or disinformation, can be helpful when assessing the extent of harmful content in the information environment (personal communication, September 25, 2024). As part of the EFCSN, fact-checkers assessed how platforms were complying with their duties under the CoP (EFCSN, 2024a) and called out technology companies when they intended to scale back their commitments to support fact-checking (EFCSN, 2025b).

In the context of EDMO and the CoP, fact-checkers also worked on monitoring disinformation narratives during elections, as well as contributed to the work of the CoP’s rapid response system (EDMO, 2024). It was seen as a success that the fact-checkers of the Bulgarian-Romanian Observatory of Digital media (BROD) conducted an analysis of the Romanian election campaign, which brought the issue to the attention of the College of Commissioners. Interviewees believed that this contributed to the increased awareness about campaign manipulation in Romania that led to the Romanian Constitutional Court’s decision to cancel the country’s presidential elections (see Anghel, 2024).

The shaping of policies takes place through participation in policy discussions but also through campaigns on dedicated topics. After the European Commission announced its intent to strengthen the CoP, some fact-checking organizations decided to join the self-regulatory mechanism as signatories. This allowed them to have a say in the formation of commitments. The most visible contribution of the fact-checking community has been its active resistance against the so-called “media exemption” or “media privilege”, which was first proposed in the context of the Digital Services Act and became later, in an altered form, Article 18 of the European Media Freedom Act² (see, for example, EU DisinfoLab, 2021). The initial amendment proposals of the European Parliament’s Committee on Culture and Education (CULT, 2021), and Committee on Legal Affairs (JURI, 2021) argued that media providers should be exempted from platforms’ “supervisory function”, as they are already subject to regulation or self-regulation in the countries they operate. Fact-checkers considered this special status of media outlets a possible risk, as there are many examples of media outlets publishing disinformation (Tsfati et al., 2020) – either on purpose or by accident – and such an arrangement would leave such content unaddressed. They voiced their opposition at public events and bilateral meetings, as well as through the publication of statements (see EFCSN, 2023).

The representatives of fact-checking organizations that participated in policy discussions or campaigns argued that the work they did was justified by the fact that developments in the field of disinformation policymaking had an impact on the fact-checking profession as well. They also emphasized that the problems related to disinformation were complex and constantly evolving, thereby needing non-traditional actors in the policymaking process. Moreover, being part of the discussion allowed them

² In the EMFA proposal, it was Art. 17.

to increase the impact of their fact-checking work. As Carlos Hernández- Echevarría of Maldita said: “We [...] understood as an organization, as a foundation, that we couldn’t just publish the fact-checks and let them be there for people to consume. We needed to amplify our impact in other ways and make sure we have better laws around disinformation and more accountability from platforms and all that” (personal communication, August 26, 2024).

Hernández-Echevarría remembers the start of his organization’s engagement with policy as follows:

There were not a lot of fact-checkers that could really devote resources to [policy work], but Maldita was one of them. So, I became very involved in the negotiation of the actual content of the Code of Practice, because we all had in mind at the time that [the CoP] was gonna be a code of conduct under the DSA. And the DSA was [...] an opportunity to ensure that disinformation was a bit more of a priority for the platforms and we wanted [it] to be meaningful, to make sure this protected freedom of speech. We saw this as an opportunity to have a say in what the commitments for the large platforms may become. (personal communication, August 26, 2024)

Hernández-Echevarría added that his organization has a broad understanding of the policy topics that are relevant to his organization. While other interviewees mentioned that they only look at topics that impact the work of fact-checkers, Maldita’s representative considered the accountability of online platforms and the implementation of the DSA as the “key issues”. He continued by saying: “We also do a lot of policy work around media self-regulation and generally anything that touches on disinformation or could have a significant impact on disinformation. It is on our radar when it comes to policy work” (personal communication, August 26, 2024).

Jelena Berković, Policy Advisor at Faktograf, explained that she joined the policy discussions because she had realized that there was a momentum in the European Union to shape policy – she saw this as a “watchdog” activity and an act of “advocacy in the name of journalism as public good”. As a representative of an organization from Croatia, a country that joined the European Union only in 2013, the work on policy-relevant issues had not been new to her. As the country was democratizing and implementing new laws to comply with the EU’s recommendations, the input from representatives of the journalistic profession was sought by the policy community in Brussels, in order to assess whether the local environment is conducive to quality journalism (personal communication, November 20, 2024).

Using its strong network, Commission support, as well as its expertise in monitoring and debunking disinformation, the fact-checking community could thus turn its cultural and social capital – hence their legitimacy – into a tool to influence online platforms’ policymaking. While there might still be risks that the work on policy may compromise the activity of fact-checkers, even the interviewees who abstained from policy discussions did

not view the current activities as problematic. It was mentioned that the wider journalistic community is also represented through journalistic associations, such as the European Federation of Journalists and Reporters Without Borders, that share their positions on policies that might affect the journalistic profession. In addition, it was noted that the integrity of the fact-checking profession can be safeguarded through a clear separation between editorial and policy activities of the outlets. As Vincent Couronne said: "I'm the CEO of Les Surligneurs. So, I do policy, and I have an editor-in-chief, to whom I cannot give any instruction on what topics to cover" (personal communication, January 13, 2025). Finally, Alexios Mantzarlis added that power relations also play a role when assessing the legitimacy of policy activities. In his opinion, if the attempt comes "from little power trying to influence big power, which is the EU regulators, then I think that's fine" (personal communication, November 8, 2024).

Fact-checkers in the fields of power: between the Commission and platforms

While fact-checkers have developed their own social and cultural capital, the economic capital they relied on came from fields that they needed to scrutinize. In the following paragraphs, we will therefore first assess fact-checkers' relationship with the European Commission and then the dynamics between fact-checkers and online platforms. We will also address possible risks and proposals to mitigate them.

Funding from public entities is controversial in a profession that derives its legitimacy from its independence – especially American stakeholders are distancing themselves, while in Europe there is more of a tradition of public support for the media (Murschetz, 2020; Neff & Pickard, 2024; Pickard, 2011). At the time of writing, the investigative journalism network Organized Crime and Corruption Reporting Project was criticized by some members of the journalistic community, as it received a significant share of its finances from the US State Department (Philippin & Candea, 2024). Many interviewees mentioned that they would not be willing to accept support from the governments of the countries in which they operate,³ but the European Commission was considered an acceptable source of funding by almost all of them. As justification, they mentioned the European Commission's good track record, as it did not try to interfere with the work of the fact-checking community, the Commission's distinctness from national governments and the specific conditions in Europe. Alexios Mantzarlis, for example, highlighted that the multiple state borders and the languages spoken in Europe require the creation of networks that are costly to maintain, while funding is scarce, as fact-checking organizations cannot generate sufficient reader revenues, and Europe also lacks the philanthropic landscape that American fact-checkers can rely on. "The countries where independent journalism has less of a strong history, including my own of Italy and Greece, the fact-checking organizations came out of nonprofit land", he said (personal communication, November 8, 2024).

³ The only case where national support was available to a larger extent was Croatia, where the Council for Electronic Media established a fact-checking fund from the European Union funds for resilience and recovery. Jelena Berković highlighted that it is a one-time grant, that can uphold its independence by funding "the method of journalism, not the output" (personal communication, November 20, 2024).

In this context, again, representatives of countries that joined the EU in the new millennium, and had started democratizing only in the 1990s, see the involvement of states in the development of independent media as less paradoxal. As Jelena Berković of Faktograf said: “I’m very much used to taking foreign democratic money for democratic development and using it for whatever makes sense in this particular development of democracy” (personal communication, November 20, 2024). In fact, there is ample literature showing how important media development assistance has been in the past decades (Mottaz, 2010; Bleyer-Simon, 2022).

As previously highlighted, independence is also important for European institutions. Thus, the selection and evaluation of grants is done by independent assessors, and Commission employees make sure not to request anything from the fact-checkers that would fall under independent editorial decision making. “We have a very clear mandate and limitations, and then we mustn’t interfere in their actions. So, if they would fact-check us, this can also happen, because there has to be accountability in all of this”, said an anonymous representative of the European Commission (personal communication, November 19, 2024).

At the time of the interviews, revenues from online platforms were the main source of income for most of the organizations in this sample (albeit there were some fact-checkers that had no platform revenue whatsoever). Many of them were part of third-party fact-checking programs, especially working for the platforms of Meta (Facebook, Instagram and WhatsApp), as well as TikTok. Some interviewees referred to the platforms as “frenemies”: they engaged with policymakers and civil society in discussions over content moderation and the mitigation of risks, committed to take certain measures and financed activities, despite having a strong monetary incentive to let controversial content flourish on their services. This situation makes the collaboration fragile.

To reduce the vulnerability of fact-checkers in this unequal relationship, the European Commission included a commitment in the CoP stating that fact-checking should be supported by platforms. At the same time, the interviewees believed that the Commission’s policies were not responsible for these platform cooperations – albeit helpful in scaling up and maintaining them. Instead, they considered the third-party cooperation a direct outcome of the developments of the United States, where Meta started cooperating with fact-checkers as a response to a number of scandals that broke about the spread of harmful content on their platforms. Meta, at the time, chose to cooperate with fact-checkers that were certified members of the International Fact Checking Network (IFCN). Alexios Mantzarlis, who was the director of the organization at the time, believes that the collaboration came to existence due to the IFCN’s ability to seize the moment, and propose a fact-checking collaboration to platforms at a time when they needed to invest in the improvement of their public image. “If you give a ready-made solution to a platform in crisis, at the right moment, they’ll take it”, said Mantzarlis (November 8, 2024). The choice of IFCN can be considered an outcome of its cultural and social capital, as it represented a network of organizations that were vetted for their standards and methodology. The spread of disinformation was not the only

scandal related to online platforms; Google and Facebook were also criticized for hurting the revenues of the press, which had already led to journalism support programs in the past (see González-Tosat & Sádaba-Chalezquer, 2021).

The interviewed fact-checkers said that, in the context of third-party collaborations, they could work freely, without interference from platforms. Platforms were not willing to pay for fact-checking content that originates from politicians; nevertheless, fact-checkers that had political disinformation in their portfolio continued to assess that kind of content as well. Some interviewees highlighted that the EFCSN could be one of the most effective tools in navigating the power relations – both with the Commission and the platforms. As Bastien Carniel of Science Feedback highlights, the EFCSN “acts as a layer that has the admin capacity, financial capacity, and brand recognition” to improve their bargaining positions. The strengthening of the EFCSN’s symbolic capital was made clear by Meta’s decision to accept EFCSN membership as an entry requirement into the third-party fact-checking program (EFCSN, 2024). Carniel added:

Fact-checking organizations are very small and lack the resources to push for things that are in our collective interest, but not sufficiently important for each of the organizations, individually to take up. For instance, we know that our content gets scraped a lot and used by commercial actors to train AI models or things like that, but we don’t have the resources to go to make sure to go negotiate deals with OpenAI and people like that. It’s in their mandate to actually take all these concerns and go reach out to OpenAI or Google. (personal communication, September 25, 2024)

Another way in which interference could be minimized was the creation of a “clearing house”. One example is the European Media and Information Fund, which provides grants to fact-checkers, researchers and media literacy professionals. Its funding comes from private donors, chiefly Google, but the tech company has no say when it comes to the selection of supported projects (Cesarini, December 9, 2024).

During the interviews, many fact-checkers noted that organizations need to be prepared that Meta or TikTok may at some point end their cooperation with fact-checking organizations. Both policy and fact-checking community representatives highlighted that diversification of revenues could further strengthen the independence of fact-checkers. Jelena Berković of the Croatian organization Faktograf, for example, argued that, in an optimal scenario, no source of revenue would contribute to more than 20 percent of the budget (personal communication, November 20, 2024). Fact-checkers also mentioned the need to collect revenues from readers and to start crowd-funding campaigns, but at the time of writing reader revenues did not manage to become an important component of the revenue mix. The only exception in the sample was Volksverpetzer. However, this outlet admittedly differed from the rest of the organizations, by taking an activist stance, using a satirical tone, prioritizing fact-checks that looked at prominent topics and had the potential to go viral, as well as putting the emphasis on mainstream conversations, including sensationalist content in tabloid media (Laschyk, personal communication, November 20, 2024).

DISCUSSION AND CONCLUSION

Fact-checking is a journalistic format that is widely practiced in the European Union and its neighbors. As the fact-checking method is used to address disinformation, both policymakers and online platforms have developed an interest in working with the fact-checking community. The European Commission has included the support of fact-checking organizations, as well as a request for the integration of their services into online platform content moderation, in a number of its policy documents, while tech companies have relied on the services of fact-checkers to signal to users and the policy community that they are working on mitigating the risks posed by disinformation.

In this constellation, fact-checking could emerge as an autonomous field with sufficient symbolic capital to influence the neighboring fields of policymaking and platform operation. Fact-checkers have participated in the formation of policies and successfully occupied a role in platform governance. However, fact-checkers were aware at the time of the interviews that their position was vulnerable, as a significant percentage of their economic capital still depended on the revenues coming from the technology companies and the policy community. The interviews showed that fact-checkers had successfully strengthened their symbolic capital, by building a robust system of rules and transparency and making it clear to observers that their actions are independent of interest groups. This can be crucial, as platforms would have a harder time justifying ceasing to work with fact-checkers if both the policy community and the users see value in their work. While fact-checkers did not manage to achieve financial independence from platforms and the policy community, the interviews show that the European Commission acted as an ally to the fact-checkers vis-a-vis the platforms, by providing them with means to establish some diversity of funding and to strengthen both their cultural and social capital, by building networks and collaborations.

The latest developments show that the protection of democracy and the integrity of the information environment appear to remain a priority for the European institutions, even in the years 2024-2029. The President of the Commission, Ursula von der Leyen announced the establishment of a so-called Democracy Shield (European Parliament, 2024b) to further this goal in the coming years. At the same time, there were several worrying trends in national politics, with election successes of leaders who are hostile towards the press and fact-checking, both inside and outside the European Union. After most of the interviews were conducted, Meta announced in the United States that it is going to end its cooperation with the country's fact-checking organizations – an action that was made possible due to a change in the country's political environment, as the re-elected Donald J. Trump framed platform-moderation as a threat to freedom of expression (Zahn, 2025). The representatives of most major technology platforms attended Trump's inauguration, in January 2025, and soon after he assumed power, Elon Musk – at the time the richest man of the world – was appointed to head the Department of Government Efficiency (DOGE) – an advisory body that initiated job cuts and the cancellation of numerous overseas grants (Clarke, 2025). American tech billionaires have been increasing

pressure on European governments (Bleyer-Simon & Marx, 2025). Musk, who fell out of Trump's favor in June 2025, has also openly supported European far-right actors and used his X social media platform to amplify disinformation (Zitelli, 2025).

There was no information about the possible ending of cooperation with fact-checkers in Europe, but European fact-checking organizations held an emergency meeting on the day of the announcement, to come up with a common position to counter the claims about censorship and ineffectiveness, and to prepare for a possible loss of funds. At the time of writing, no official assessment had been made, but fact-checking organizations estimated that the withdrawal of Meta would deprive EU fact-checking organizations of EUR 30 million per year. It is a significant amount. Most fact-checking organizations would need to downsize, some of them may not be able to continue operating. The EFCSN (2025b) published a statement in which they highlighted the possible risks of the tech company's decision to end its engagement with fact-checkers.

Whether the European Commission can provide protection to the fact-checking community and incentivize fact-checkers with its regulatory regime remains to be seen. Vincent Couronne, CEO of Les Surligneurs, who we interviewed after the announcement of Meta, said that the coming months would become a "stress test or crash test for DSA in the EU", and the success of the exercise will depend on whether the European Commission, the body in charge of the enforcement of the regulation, can act as a law enforcement authority rather than a political institution. He added that a self- and co-regulatory tool, such as the Code of Practice on Disinformation, can only become successful if political institutions are stronger than the private companies (Couronne, personal communication, January 13, 2025).

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Appendix

List of interviewees

>Anonymous European Commission official, November 19, 2024

>Anonymous interviewee from unnamed fact-checking organization, November 29, 2024

- >Anonymous European Commission Official, January 8, 2025
- >Jelena Berković, Policy Advisor at Faktograf, November 20, 2024
- >Marie Bohner, Head of Development and Partnerships, Digital Investigation, Agence France-Presse, Member of the Governance Body of the EFCSN, November 27, 2024
- >Tommaso Canetta, Deputy Director of Pagella Politica, September 10, 2024
- >Bastien Carniel, Data & Policy Lead at Science Feedback, September 25, 2024
- >Paolo Cesarini, Chair of the Executive Board of the European Digital Media Observatory, December 9, 2024
- >Vincent Couronne, General Director of Les Surligneurs, Member of the Governance Body and Treasurer of the European Fact-Checking Standards Network, January 13, 2025
- >Paula Gori, Secretary General of the European Digital Media Observatory, October 30, 2024
- >Carlos Hernández- Echevarría, Associate Director of Maldita, August 26, 2024
- >Bernd Kerschner, Editor-in-Chief at Medizin Transparent, November 19, 2024
- >Irene Larraz, Coordinator of Verification at Newtral, December 13, 2024
- >Thomas Laschik, Founder and Editor-in-Chief at Volksverpetzer, November 20, 2024
- >Alexios Mantzarlis, Online Information Quality Professional, November 8, 2024
- >Stephan Mündges, Coordinator of European Fact-Checking Standards Network, September 23, 2024
- >Nelly Pailleux, Chief Operations Officer at Les Surligneurs, December 17, 2024
- >Jochen Spangenberg, media practitioner, Member of the Advisory Board of the European Digital Media Observatory, November 18, 2024
- >Treasurer of the European Fact-Checking Standards Network, January 13, 2025
- >Giovanni Zagni, Director of Pagella Politica, October 18, 2024 & October 23, 2024

UTVRĐIVANJE ČINJENICA KAO FOKUS JAVNIH POLITIKA EU-A

Konrad Bleyer-Simon

SAŽETAK *Utvrdjivanje činjenica (engl. fact-checking) popularan je novinarski oblik koji se naširoko koristi diljem Europske unije kao odgovor na dezinformacije i druge lažne narative koji se šire i putem društvenih mreža i putem tradicionalnih medija. Kako bi potaknula njegovu širu primjenu, Europska komisija uključila je u brojne svoje strateške dokumente podršku organizacijama za utvrđivanje činjenica, kao i zahtjev za integraciju njihovih usluga u moderiranje sadržaja na internetskim platformama. Aktivnosti nadzora koje provode oni koji utvrđuju činjenice tako postaju dijelom javnih politika EU-a, što pak omogućuje tim organizacijama da oblikuju politike – iako ne bez određenih prepreka, s obzirom na to da mnoge osobe koje utvrđuju činjenice ovise o financiranju tehnoloških kompanija i europskih institucija. Cilj ovog rada jest bolje razumjeti europski krajolik utvrđivanja činjenica te identificirati na koje načine organizacije koje se time bave komuniciraju s donositeljima politika u EU-u, kako europske institucije i zajednica za utvrđivanje činjenica mogu međusobno utjecati jedni na druge, kao i kakvi su odnosi moći između organizacija za utvrđivanje činjenica i internetskih platformi.*

KLJUČNE RIJEČI

UTVRĐIVANJE ČINJENICA, EUROPSKA UNIJA, UPRAVLJANJE PLATFORMAMA,
DRUŠTVENE MREŽE, DEZINFORMACIJE

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EXPLORING ETHICAL AND REGULATORY CHALLENGES OF AI INTEGRATION IN EUROPEAN UNION NEWSROOMS

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ABSTRACT Artificial Intelligence (AI) has significantly reshaped the news media landscape in the fast-evolving digital ecosystem. While recent legislative measures and industry self-regulation initiatives have emerged to address AI's implications, the ethical challenges associated with its adoption in European Union (EU) newsrooms and the ways news media organisations navigate regulatory frameworks and internal initiatives remain underexplored. This study aims to bridge this gap by examining the conditions under which AI tools are integrated into media organisations from both organisational and regulatory perspectives. Drawing on an analysis of 30 key documents and 41 in-depth interviews with media professionals and regulatory experts across three EU markets, the study uncovers key findings: a limited discourse on AI use in media organisations, significant disparities in AI implementation practices, and an absence of clear, actionable regulatory guidelines for addressing considerations in AI-driven news content.

KEYWORDS

MEDIA REGULATION, DIGITAL JOURNALISM, ARTIFICIAL INTELLIGENCE, MEDIA ETHICS, ALGORITHMIC JOURNALISM

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INTRODUCTION

The rapid change in media consumption in recent years, driven by technological advancements and platforms, has transformed the landscape of news production and dissemination. The *Digital News Report 2024* by the Reuters Institute of Journalism proves that the significance of traditional media outlets like television and print has diminished over time despite remaining significant sources of information (Newman et al., 2024), to the benefit of services provided by media companies (mobile applications, push services), but also by players outside the news industry (search engines, social networks, content aggregation platforms). While 71% of respondents mention TV as a primary source for news, it is followed by online press (42%), social media (37%), and radio (37%) (European Parliament, 2023). Media usage varies by age, with younger respondents favouring digital platforms like social media and video apps. Hence, digitalisation in the news media industry has significantly diversified how people access information. These digital services use recommendation algorithms to prioritize, classify and promote selected content. While these recommendation systems (RSs) facilitate navigation and access to content, their sorting criteria are rarely explicit. This opacity appears to be a primary type of obstacle to users' ability to determine their own sources of information. Since the 2020s, the rise of AI has further amplified these dynamics as AI-based tools are increasingly integrated into platforms, blurring the boundaries between traditional journalism and algorithmic-driven journalism. Platform intermediation (Siapera, 2013) not only alters the relationship between news producers and audiences but also threatens core journalistic principles, including editorial independence and fairness. As platforms consolidate financial and informational power (Newman et al., 2020), the ethical challenges for news media organisations in maintaining professional standards while integrating AI technologies have become increasingly acute.

Digitalisation and the dominance of online platforms over media markets also impact news production and distribution practices. First, the integration of digital technologies in media organisations enables innovative opportunities (Sonni et al., 2024) when it comes to content creation, distribution, customization and audience engagement (Åkesson et al., 2018). Second, since the 2010s, media organisations have to deal with these platforms to reach their audiences (Kleis Nielsen & Ganter, 2017), but also to make their news content visible, reachable and profitable. These new dependencies on intermediaries have an impact not only on the ability of news organisations to assert their editorial lines and brand specificities, but also on the very nature of news content and formats, with increased risks of misinformation (Shin et al., 2024) or disinformation. On a macro-economic scale, economic concentration within the sector benefits a small number of investors and ownership groups, risking reduced pluralism and diversity in news production (European University Institute, 2024; Hendrickx & Ranaivoson, 2019).

Both news media organisations and online platforms increasingly integrate artificial intelligence (AI) into their activities (Diakopoulos et al., 2024; Henriksson, 2023)¹. AI has become central to digital media formats, streamlining editorial workflows, personalising content (Bodó, 2019), and enhancing user engagement through sophisticated AI tools (Beckett & Yaseen, 2023) such as news recommender systems (Napoli, 2015; Simon, 2024a). This has an impact on the structure of news media. The ethical challenges of using AI in newsrooms (Gutiérrez-Caneda et al., 2024; Dörr, 2023), such as transparency (Balasubramaniam et al., 2023), accountability, and fairness, are not peculiar to the media sectors. Yet, these concerns are particularly critical in the news sector, as they can undermine the ethical principles of the journalistic profession and its role in supporting democracy and informed public debate where ethical values like ensuring truth and accuracy, maintaining editorial independence, practicing fairness and impartiality, and upholding accountability are essential to sustaining democratic processes and an informed citizenry.

At the EU level, these reconfigurations are prompting regulatory interventions. The regulation of media activity is aimed both at asserting the specific nature of professions, ethical frameworks and economic models, and at integrating these activities with those of other players and services, in particular online platforms and social networks (Dragomir et al., 2024; Holtz-Bacha, 2024; Seipp et al., 2024). Recent EU legislative initiatives are particularly relevant: the *European Media Freedom Act* (EMFA) aims to safeguard editorial independence and pluralism; the *Digital Services Act* (DSA) aims to ensure a fair and open online platform environment; and the *AI Act*, sets transparency and risk-management obligations for AI use, including in media contexts.

In this context, this article seeks to examine the current extent to which professionals in news media organisations are adopting AI tools, how these organisations are managing their implementation, and the regulatory responses brought about by the associated challenges. The research question that guides our research is: Under which conditions are AI tools integrated into news media organisations from an organisational and regulatory point of view? Focusing on the French-speaking Belgian, French and Spanish markets, we highlight the ethical issues and risks associated with the integration of AI and compare the key insights from the different regulatory frameworks in these regions. This comparative analysis enables us to identify alternative or complementary approaches for the regulation of AI within news media organisations and the broader media sector.

¹ For the purpose of this article, we adopt the definition of AI provided in Art. 3 of the *EU AI Act*: “AI system’ means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments”. This definition underscores the versatility and impact of AI in reshaping digital environments and media practices.

AI IN NEWSROOMS

This paper is situated within the literature on the political economy of communication, which analyses the power relations and forces that shape the production, consumption and distribution of resources (Freedman, 2014; Golding & Murdock, 1997). While political economy provides the overarching framework for understanding power and resource dynamics in society, the political economy of communication narrows this lens to focus on how these dynamics operate in media and communication systems.

From this critical perspective, we will analyse the relationships between media companies and AI technologies, taking into account both professional practices in a context of digitalization of uses and content, and market reconfiguration dynamics, particularly due to their internationalization, financialization and oligopolistic concentration (Hardy, 2014; Wasko, 2014). We will be paying particular attention to how AI discourse and usage relate to the dynamics of concentration and its effects on freedom of information, pluralism of opinions, as well as diversity (Gangadharan & Niklas, 2019; Knoche, 2013; Neff & Benson, 2021; Wasko, 2014). In the complex media landscape, power seen through the lens of the political economy of communication is not limited to the formal ownership of media outlets but also includes the ownership of data, algorithms and infrastructure (Seipp et al., 2023), which impacts the content and practices of journalism (Garnham, 2000; Sjøvaag & Ohlsson, 2024) as well as its influence on public opinion.

The multifaceted use of AI in news media organisations

The use of AI tools to perform tasks of varying complexity through automation has increasingly become a standard practice in the editorial and marketing departments of some media organisations. However, the precise uses integrated into business software and procedures are still heterogeneous and experimental, not least because of a gradual awareness of their effects on the deontological and ethical frameworks of journalism. A 2024 report for the Associated Press on generative AI in journalism (Diakopoulos et al., 2024) shows these tools concern both the production of news (e.g., content enrichment, fact-checking) and its editing (e.g., illustrations, formatting, tags, subtitling), distribution (e.g., sharing on platforms and social media) and audience monitoring (Prasad & Makesh, 2024). How these technologies are integrated into working environments differs according to the size of the media organisation and their financial capacity, with large media groups having an advantage, and to the priority a company gives to the economic value of its audience. Although some are not planning to exploit AI-based technologies, smaller and independent organisations appear to be at a disadvantage compared to larger outlets with the resources to implement more advanced audience strategies (Reviglio, 2023). Implementing AI tools as part of the daily work routine, training the staff (Noain-Sánchez, 2022) and maintaining an organised, structured and clean database for the use of proprietary AI and RSs also require substantial investments.

Research by De-Lima-Santos and Ceron (2022) highlights the positive contribution of AI in news media, exemplifying its productivity gains in planning, scheduling and

optimisation, alongside reducing the time and labour required for repetitive tasks and freeing the time of the teams to focus on more creative tasks. In editorial departments, AI helps document synthesis, translation, subtitling, multi-format editing and more sensitive tasks as source anonymization. For marketing activities, the personalisation of sales campaigns and offers is facilitated; machine learning models improve the predictability of users' expectations. Recommender systems are used by news organisations to structure and personalise the content media companies display on their websites and apps. Therefore, these efficiency gains combined with the customisation component help news media outlets create tailored experiences for readers and inform their business strategies. To stay competitive, media organisations must reconfigure their journalistic practices by integrating AI tools (Hardy, 2014). While the literature shows disparate use of AI in news media organisations, it also highlights ethical issues and their potential impact on society. The risks encompass a range of concerns, from over-reliance on automation and potential job displacement to ethical issues surrounding AI-generated content. Epistemologically, AI, particularly generative AI, questions the status of truth and facts, thought processes and editorial postures, and the common culture necessary for the cohesion of societies. For all these reasons, the growing use of AI is disrupting both the way the media operate and the recognition of their practices and productions in the general interest of society.

Associated challenges

The (over)reliance on online platforms as a news distribution and consumption vehicle presents risks not only to the independence and pluralism of the media but also undermines its critical position and creates platform dependency, threatening editorial autonomy (Dodds et al., 2023). Considering news media organisations as "gatekeepers and agenda setters" (Cools et al., 2021), editorial autonomy – the ability of journalists and media organisations to independently select, frame, and prioritize content without external interference – is particularly relevant. The growing dependency on platform algorithms for distribution and visibility can influence editorial choices, leading to shifts in news agendas and erosion of media pluralism (Simon, 2022). These concerns are central, as they directly affect journalism's democratic functions of holding power to account and fostering diverse public discourse. These risks apply equally to the general and specialized media, national and local (Jomini Stroud & Van Duyn, 2023). The algorithmic design of recommender systems may induce a reduction in the visibility of low-engagement content (Toff & Mathews, 2021). Concomitantly, the economic incentives and operating principles of social media platforms are shaping the editorial choices of local news outlets (Reviglio, 2023). Like any mediatization arrangement, platforms and social networks affect both news formats and content (Lafon, 2019). For example, the relative invisibility of articles on local politics on Facebook can be explained by their low engagement rate (Weber et al., 2019). Finally, the use of recommender systems and AI for search and hierarchical functionalities is leading to new tasks and skills for news organisations.

The digitalisation of the news media industry has profoundly transformed how audiences consume news, compelling journalists and editorial teams to produce and distribute content across a wide range of platforms (Sebbah et al., 2020). This shift requires

news content to be available in diverse written and audiovisual formats, enhanced with elements such as tags, subtitles, and translations. Additionally, media professionals must adapt to the logic of recommender systems (Weber et al., 2019) and “navigate the challenges of invisibility posed by the platform economy” (Lamot & Paulussen, 2024, p. 13), ensuring their content remains discoverable and relevant in a competitive digital ecosystem. Platforms influence news visibility by organising content through algorithmic curation and moderation. Challenges such as limited control over personalisation, questionable privacy protections, attention-grabbing strategies, and dependency on the social media ecosystem have driven news media organisations to experiment with alternative media formats like email newsletters and podcasts.

In pursuit of similar goals – audience engagement, retention, and efficiency – media organisations have also adopted data-driven news recommender systems on their own websites and mobile apps. However, as van Dijck et al. (2018) caution, datafication can undermine the independence of individual journalists and editors. Algorithmic personalisation on news platforms often clashes with the editorial identity of press organisations (Chakraborty et al., 2018). Specifically, the use of recommender systems disrupts the editorial balance of themes, opinions, and formats, occasionally leading to tensions with the established editorial line (Møller, 2023), a challenge underscored by our own findings. The editorial identity of a media company, which is defined by a balance within a structured set of news content, is thus threatened by the fragmentation of its productions into individualized items of “content” and their decoupling from their source (Wilding et al., 2018, p. 37).

News organisations are guided by ethical journalistic practices that serve as a framework for the selection of news and the drafting of editorial guidelines and codes of conduct (Diakopoulos, 2019a). These deontological rules and ethical frameworks are not rigid and vary based on changes in the production environment as well as in the news organisation’s structure in terms of ownership and editors (Firmstone, 2024). Shilton (2018) highlights that algorithms and AI also embed the values of their designers and developers. In addition to the technological choices they make, the actions of these agents induce risks, be they cognitive biases (Brem & Riveccio, 2024) or “value tuning” (Bazin, 2024) aimed at optimizing a model’s response to an identified or hypothesized need. Given that these values are rooted outside the non-journalistic field, the use of AI-based tools by news organisations calls into question the ethical journalistic practices and the specificities of news production and dissemination

Alongside the journalistic aspects, all stakeholders, including AI technologies, “publishers, advertisers, data producers, governments, and users all have their own agendas in the political economy of algorithm systems” (Lindén, 2017, p. 73). Faced with these dynamics, public policies and institutions attempt to frame or regulate the balance of power between these stakeholders and to redefine the ethical, moral and operational principles and methods to ultimately safeguard journalism and the wider democratic public interests.

METHODOLOGY

Considering the increasing importance of AI in news media and the impact it has both within and outside these organisations, our research question is: Under which conditions are AI tools integrated into newsrooms within news media organisations from an organisational and regulatory point of view? Therefore, our research has two main objectives: (1) to better understand the conditions in which AI tools are integrated into professional practices; and (2) to assess the relevance of regulatory policies to the issues raised by these practices.

To address these objectives, our approach combines desk research with in-depth interviews, applied to a sample of 19 news media outlets, including public and commercial, traditional (press, radio, TV) and digital native media, in three markets: French-speaking Belgium, France, and Spain². The selection of Spain, France, and the French-speaking part of Belgium is grounded in their shared characteristics of strong political parallelism and traditions of state intervention. Spain and France are classic examples of the “Polarized Pluralist” model (Hallin & Mancini, 2004). While Belgium is generally classified as “Democratic Corporatist”, Hallin and Mancini (2004, p. 70) note that it is the case closest to the “Mediterranean” model considering “the relatively strong involvement of political parties in public broadcasting”.

For that purpose, we have first analysed the websites of the 19 news media organisations in 2024, focusing on whether guidelines exist for AI deployment in their organisation and editorial decision-making. We selected 30 relevant documents: ethical and/or editorial chart, codes of conduct, privacy, and ethical principles towards RS and AI. In these documents, we identified the topics requiring these companies’ attention, and the solutions and commitments proposed to address identified risks. In addition, we conducted 41 semi-structured interviews between November 2023 and November 2024. The interviewees included employees of the news media organisations listed below in Table 1, as well as legal experts and representatives of relevant regulatory bodies (see Appendix). To ensure consistency, the document analysis only applies to the organisations that we were able to interview. However, they represent the largest audiences in the three markets.

Finally, an important contribution of this paper is the inclusion of three European markets in the analysis. While the approach remains anchored in qualitative, in-depth research, our selection provides a diverse sample, representing different cultural, regulatory, and market contexts within the European media ecosystem. While we have remained cautious in the comparison of results due to such diversity, the comparative approach enriches a single-market case study and therefore reduces the gap towards generalisation.

² For the Spanish market, the news media organisations and media groups included in this study are RTVE (Public Service Media -PSM-), El País, El Español, La Vanguardia, Atresmedia, and 20 Minutos. For the French market, M6, TF1, Le Monde, Mediapart, BFM TV, Libération, Canal Plus, France TV (PSM), Lagardère News, and Radio France (PSM). Lastly, for the French-speaking Belgian market, Le Soir, IPM Group, and RTBF (PSM).

RESULTS

Striving for Balance: Innovation, Ethics and AI Regulation in the News Industry

A still experimental integration of AI tools in news media organisations

The interviews we conducted show that, particularly since the end of 2022 and the public release of ChatGPT and other AI tools, heads of media organisations have initiated discussions with professional bodies and carried out training sessions to define how and to what extent AI tools are integrated. These actions were primarily taken to increase productivity, offer innovative products in a competitive information market, and weigh more in their power relations with the platforms that reach their audience.

Our interviews, however, show that the integration of AI into media organisations remains in a relatively experimental and cautious phase, with significant variability in adoption practices across different organisations and departments. Most interviewees commonly agreed that, from an organisational perspective, AI primarily enhances operational efficiency by reducing the time spent on routine tasks, though human oversight remains a key element. Interviewee 26-France explained that their group set up an in-house platform for generative AI and data in 2023, with points of contact in various teams, to “optimise certain actions that used to be automated and repetitive, such as Speech-to-text, which translates all our audio content into text, produces summaries for social networks, and organises our internal database”. AI is also employed to suggest headlines for news articles, propose captions for social media posts, and even cover routine events like national lottery contests or sports. Some media groups are experimenting with new services, such as “a critical analysis tool for the article written by the journalist which will give him an opinion on the style, spelling, and possible discriminatory biases” (Interviewee 26-France).

Economic benefits of integrating AI: from productivity gains to audience engagement and retention

We observed major differences regarding the original format and the size of media organisations. With digitalisation and the centrality of online platforms, the written press had to invest in audiovisual production skills and resources. Radio, TV and print outlets recruited journalists for editorial work and to manage the editing of content on social networks. AI is also used to manage archives and make the most of them. The implementation of AI into business software has taken place under varying conditions: larger media groups, both public and private, have in-house IT departments or partnerships with research and innovation centres. Such groups have human and financial investment capacities that enable them to roll out new services across all their titles: tagging, titling, and summarisation for platforms in all formats. Smaller and web-only organisations have fewer resources at their disposal and appear to be even more cautious in their use of AI. These developments reflect broader trends in the media industry, where AI may be seen as a cost-saving measure that allows journalists to allocate more time to value-added tasks, as discussed by Beckett and Yassen (2023) and by Fieiras Ceide et al. (2024). Several

interviewees highlighted the efficiency gains that AI has brought to their workflows. Interviewee 6-Spain described a trial in which AI-generated newsletters, based on Afghan newspapers, were translated and summarised for journalists on the ground, allowing them to focus on refining content for the Spanish audience. Others discussed AI's role in optimising social media content and automating tasks such as election result reporting, further enhancing newsroom efficiency.

In addition to productivity gains, the integration of AI in newsrooms is also driven by strategies to capture and retain subscribers. Several interviewees, mainly from large private media groups, state that data management platforms and algorithmic processing enable both premium content offerings and better advertising targeting. The objective here is economic, with AI expected to increase the average revenue per user (ARPU). Interviewee 39-Belgium explains: "On the site, a banner is managed automatically by an algorithm, set up by marketing in collaboration with the editors-in-chief. The relative weighting of the most-read content, time spent, etc. can be adjusted, with a balance between free/paid/member content". Interviewee 5-Spain highlighted the AI's role in audience-related metrics, reflecting a broader trend of using AI for audience engagement and retention (Bodó, 2019). Some media we observed also experimented with offering their subscribers the option of filtering the content according to themes of their choice, but this service appears to be unsatisfactory and possibly counterproductive in terms of loyalty. The use of personalised recommendation systems may contribute to making the media's editorial line and the hierarchization of information less clear. This phenomenon has relatively little effect on media whose brands are already well established and recognized: "We can offer customization services to our subscribers because we have a strong brand, which is a guarantee of trust", explains Interviewee 33-France. Others choose not to use automatic recommendation on their own services, considering it essential that editorial management be run by humans and that their production cannot be fragmented: "What makes us who we are is a balance between hierarchical and echoing information. It makes no sense for us, and I think for our readers, to leave this to an algorithm. Our job is not to produce "content" but to offer keys to understanding our societies through a structured set of news analyses, seen as a whole" (Interviewee 29-France). For its part, French and Belgian public service media companies developed recommender systems for their platforms, "specifically designed to reinforce its role in promoting diversity and reinforce its position as a public service" (Interviewee 41-France).

The role of AI in the interactions with digital platforms

In terms of market structure, the increasing integration of AI could further concentrate power in the hands of a few dominant players who can afford to invest in advanced AI tools (Napoli, 2015; Simon, 2024b). Interviewee 1-Spain notes that while AI-driven tools are helping to reach underrepresented communities, smaller media organisations that lack the resources to invest in AI might struggle to compete in a market increasingly driven by technology. The Tech Giants are all designing tools and services for journalists and media organisations: Genesis for Google, and Semafor for Microsoft, for instance. The imbalance of power in favour of dominant players, due to their technological and

financial advantage, thus appears likely to affect media pluralism by reducing the diversity of editorial voices available to the public and increasing the homogenization of news content (European University Institute, 2024).

AI is also reconfiguring cooperation with the platforms and services that generate automatic content. In France, Spain and French-speaking Belgium, only a few but relevant media, have negotiated agreements with these stakeholders. OpenAI has partnered with Le Monde and Prisa Media to bring French and Spanish news content to ChatGPT. While such individual negotiation may benefit influential players who have a volume of quality content relevant to the needs of AI, it also minimises the collective capacity of media to defend their legal and financial rights against AI service providers. Interviewee 29-France sees this as essential: "We denounce press organisations that sign bilateral agreements with platforms. Obviously, such an approach only benefits the platforms, which are in the business of 'divide and conquer', imposing rules that are totally opaque."

Ethical reasons for limited use of AI by news media organisations and professionals

One key reason for the limited use of AI tools by news media comes from resistance by professionals in these organisations. To address this challenge, some media have set up internal training and awareness-raising working groups and practical discovery workshops. The cautious integration highlights a broader challenge for media organisations: balancing innovation with ethical responsibility, particularly regarding their contribution to the public good and maintaining editorial independence (Blassnig, et al., 2024). Hence, Interviewee 26-France, while explaining how AI is used by their organisation, emphasises that AI must always operate under human supervision, which is what most of the representatives we interviewed said: "AI should be applied with the same principles as traditional information, always requiring human supervision and validation". Interviewee 38-Belgium recalls: "But in all cases, the journalist remains central and responsible". These views align with broader discussions in the literature, including scholars like de-Lima-Santos and Ceron (2021) who argue that AI systems in media should be viewed as a tool to increase productivity rather than as a replacement for human-driven journalism: "AI is not a silver bullet for journalism, but it is a new tool that requires members of the news industry to possess more understanding to further support and bolster AI capabilities in newsrooms" (p.18). Some interviewees also see AI applications as opportunities to rethink the ethical dimensions of journalism: "Questions surrounding AI and journalism, in today's turbulent societal contexts, can enable us to reaffirm our societal and democratic responsibility," argues Interviewee 32-France.

On platforms like TikTok, where building community trust is paramount, they prioritise having a recognisable human presence. As Interviewee 14-Spain explains: "There is an AI tool that gives you the voice-over automatically. But it scares me, honestly. I mean, I do not like it at all, I just do not like it, it seems super artificial to me, very impostured". This sentiment echoes concerns raised by Nguyen and Hekman (2024), who argue that if not properly managed, automation in content creation could lead to a depersonalised media landscape, distancing journalists from their audiences. Additionally, Interviewee 16-Spain

emphasises that on-the-ground reporting and exclusive insights, which rely on human judgement, cannot be replicated by AI. This mirrors broader concerns in media studies about the limitations of AI in replicating human creativity and the ethical implications of over-relying on automated systems (Dörr & Hollnbuchner, 2017; Milano et al., 2020).

Fragmented AI governance

The rapid development and diverse applications of AI in the news media sector make it challenging to think and operate comprehensive regulations, both at local and international levels. Technology is evolving faster than legislation can keep up, making it difficult to establish regulations that remain relevant and effective (Simon, 2024b). There is no clear consensus on how to approach specifically AI regulation in news media. Some experts argue for more comprehensive regulations (Dutkiewicz & Krack, 2024), while others believe the industry should self-regulate to some extent (Porlezza, 2023), as there is a concern that overly strict regulations could stifle innovation and put news organisations at a disadvantage. Media regulation comprises three main methods: regulation, where government authorities impose legal standards and oversight on media operations; self-regulation, in which the media industry voluntarily establishes and enforces its own codes of conduct and ethical guidelines; and co-regulation, a hybrid approach that allows collaborative governance between the state and media entities (Csink & Mayer, 2014).

EU and national regulations of AI in the media sector in France, Spain, and the French-speaking part of Belgium

Several regulatory frameworks impact the use of AI in media sectors. However, they are usually not designed specifically for media. At the European level, the *AI Act* aims to comprehensively regulate the use of AI, but its impact on media sectors remains to be seen. The *AI Act*³ defines AI broadly and categorises different technologies by their risk level, with more stringent regulations for high-risk systems. Media-related AI, however, is not classified as high-risk, meaning it is subject to lighter regulation. The *AI Act* requires developers to provide detailed technical documentation on AI models, training data and testing processes (Dutkiewicz et al., 2024), as well as a risk assessment. Our document analysis of media organisations' internal charters and ethical guidelines, combined with interview data, highlights that despite their increasing use of AI, many companies have not adopted specific transparency obligations regarding AI-driven news production. Consequently, it appears necessary to reinforce guarantees of transparency and risk monitoring, both concerning technical solutions and their integration into media organisations' editorial workflows.

At the national level, the regulation of AI in news media also appears to be fragmented and evolving in the studied markets. In France, the Law Against Information Manipulation⁴, passed in 2018, does not tackle AI itself but emphasises algorithmic transparency, urging

³ Regulation 2024/1689. *Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act) (Text with EEA relevance)*. <https://eur-lex.europa.eu/eli/reg/2024/1689/oj>.

⁴ Loi Relative à la Lutte contre la manipulation de l'information (2018). République Française. *LOI n. 2018-1202 du 22 décembre 2018 relative à la lutte contre la manipulation de l'information*. Retrieved from <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000037847559/>

platforms to clarify content sourcing and support media literacy among users: “Users must [...] understand the operating principles of the algorithms that govern the organisation, selection and scheduling of this content” (p. 3), and platforms should identify “the sources of content from organisations and press agencies, and even put in place ‘labels’ and systems that “highlight information from these sources” (p. 4). The aim is to distinguish journalistic content from false information, unverified information or promotional content. In addition, as part of the France 2030 Plan⁵, the French government has developed a strategy of investment in research and innovation to “accelerate the adoption of artificial intelligence” in a wide range of fields, although it has not yet given any specific thought to the media and information sector. Similarly, in Spain, news media organisations are not mentioned in the AI Strategy 2024⁶ approved by the Spanish Council of Ministers. In August 2024, the government established the Spanish Agency for the Supervision of Artificial Intelligence⁷ (AESIA), which has supervisory responsibilities, including inspection and sanctioning powers as outlined in the *AI Act*, and ensures the proper implementation of all national and European regulations concerning the use and development of AI. In Belgium, an Ethics Advisory Council on Data and AI was created in 2024, primarily intended for the application of good practices in the Federal public administration. According to the Belgian AI Strategy Report⁸, policymakers acknowledge the importance of developing AI applications that adhere to robust ethical and legal standards. The *AI Act* does not deal explicitly with the specificities of the information media and news content (which was foreseen in a first version of the text). Media are considered as any content provider, but the fact that a human intervenes in the process leading to the publication of AI-generated content is enough to exempt the media from transparency obligations towards its audience (European Union, 2024, Art. 50).

Efforts to establish a regulatory ecosystem for AI in the media sector are currently underway. Interviewee 17-Spain pointed out that one of the major barriers to effective regulation of AI in the Spanish news media sector is the lack of a dedicated governmental body to oversee the sector and based on interview data, the same can be said about France and Belgium. This makes it difficult for media organisations to advocate for coherent policies on the use of AI tools in the newsroom. Reporters Without Borders (2025) however stresses that the EU should consider “the threat to European citizens’ right to access reliable information as a ‘systemic risk’, requiring the utmost vigilance on the part of AI providers”

⁵ Plan de relance France 2030. République Française. Ministère de l’Économie, des finances et de l’Industrie (2024). *France 2030: stratégie nationale pour l’intelligence artificielle*. Retrieved from <https://www.entreprises.gouv.fr/priorites-et-actions/autonomie-strategique/soutenir-linnovation-dans-les-secteurs-strategiques-de-6>

⁶ Ministerio para la Transformación Digital y de la Función Pública (2024) *Aprobada la Estrategia de Inteligencia Artificial 2024, España Digital 2026*. Retrieved from <https://espanadigital.gob.es/actualidad/aprobada-la-estrategia-de-inteligencia-artificial-2024>.

⁷ Real Decreto 729/2023, de 22 de Agosto, Por El Que Se Aprueba El Estatuto de La Agencia Española de Supervisión de Inteligencia Artificial. Boletín Oficial del Estado (Official State Gazette), 210, de 2 de septiembre de 2023. www.boe.es/diario_boe/txt.php?id=BOE-A-2023-18911.

⁸ SPF Stratégie et Appui (BOSA). *Plan National de Convergence Pour Le Développement de l’Intelligence Artificielle*. Nov. 2022. https://bosa.belgium.be/sites/default/files/content/documents/DTdocs/AI/Plan_national_de_convergence_pour_le_developpement_de_lintelligence_artificielle.pdf

Self-regulation of AI use by the media

Alongside institutional frameworks, the economic players themselves are mobilising to redefine their professional practices and to influence the balance of power in the sharing of values associated with the use of AI. There is a push for media organisations to develop their transparency policies and ethical guidelines for AI use (Burnley, 2024) and, therefore, some media organisations may choose self-regulation to maintain control over their ethical standards and operational practices, preserving journalistic integrity and independence from external regulations that may not fully grasp the industry's nuances (de-Lima-Santos et al., 2024).

However, as we see in this study, not all news media organisations act swiftly or have clear standards for the use of AI in newsrooms, resulting in different approaches across the industry (see Table 1). Likewise, it is important to highlight that some organisations may lack the resources or expertise to develop comprehensive self-regulatory frameworks, leading to inconsistencies in how AI is integrated and managed.

Table 1 provides a comparative analysis of news media organisations' discourse on their use of AI. Around 60% of the media sites we analysed do not have an official discourse on AI. 40% mention or position themselves, to varying degrees and in different forms, concerning the integration of AI into their organisation, and only 20% express their ethical commitments linked to these technologies (most often by reaffirming the journalist's ultimate responsibility). Media organisations thus show limited integration of AI-related considerations into their ethical frameworks or policies. Most Spanish organisations added here, including major national media outlets such as El País and El Mundo, do not meaningfully address these topics. The sole exception is Atresmedia, a commercial media group which has developed a simple four-page policy on the responsible use of AI. In France, engagement with AI is somewhat more pronounced, though it varies across media. Organisations like Le Monde, TF1, and M6 incorporate discussions on AI into their ethical charters, linking these tools to innovation and technological disruption more than to ethics or deontology. However, Le Monde and France TV group stand out and address the ethical dimensions of AI usage. The French-speaking Belgian market demonstrates a similar approach to AI integration. RTBF, the French-language PSM, adopts a strong public interest-driven perspective, aligning its discussions of algorithms and AI with democratic values. It has for several years undertaken a series of actions internally and with the public to measure the issues linked to its potential uses of AIs and algorithms, to debate them and to formalise⁹. Commercial outlets, such as RTL Info, also engage with AI, focusing on innovation and internal training. Overall, at the time of the study, the findings underscore a lack of comprehensive public guidelines and limited engagement with the ethical regulation of AI tools in newsrooms, reflecting an underdeveloped discourse on their ethical and social implications.

⁹ RTBF. (2024, March 6). *Intelligence artificielle dans les rédactions: Comment l'utilisons-nous? Quelles règles pour les médias d'information?* Retrieved from <https://www.rtbf.be/article/intelligence-artificielle-dans-les-redactions-comment-l-utilisons-nous-quelles-regles-pour-les-medias-d-information-11368742>

Table 1. Overview of Media Outlets' Ethical Guidelines and AI Discourses in Spain, France, and French-speaking Belgium.

Type of Media	Name of Document	Discourse on Algorithms and AI	Ethical Discourse on AI
<i>Name of the Media</i>			
<i>Spanish Market</i>			
<i>RTVE</i>			
Public service media	Ethical Chart 2019 and Corporate Social Responsibility2023	No	No
<i>El País (Grupo PRISA)</i>			
National press	Ethical Chart from PRISA (the media group) 2019 + Ethical Chart from El País	No	No
<i>El Mundo</i>			
National press	Ethical Code and 'Good Practices' Chart	No	No
<i>Atresmedia</i>			
Commercial media group	Policy for the Responsible Use of Artificial Intelligence and Related Tools	Yes	Yes
<i>El Español</i>			
Digital native newspaper	Not found	No	No
<i>La Vanguardia (Grupo Godó)</i>			
National press	Code of Conduct and Report on the Statement of Non-Financial Information 2022	No	No
<i>20 Minutos (Grupo Henneo)</i>			
National press	Ethical Code and 'Good Practices' Chart	No	No
<i>French Market</i>			
<i>TF1 (Bouygues Group)</i>			
Commercial television	Ethical Code and Deontological Chart	Yes (innovation)	No
<i>France TV Group</i>			
Public service media, Audiovisual	Ethical Chart and Deontological Chart	Yes	Yes
<i>M6 (Bertelsmann Group)</i>			
Commercial television	Ethical and Deontological Code	Yes (innovation)	No
<i>BFM TV (Altice Group)</i>			
Commercial news television	Deontological Chart	No	No
<i>Canal Plus (Vivendi/Bolloré Group)</i>			
Commercial audiovisual group	Ethical Chart and Deontological Chart, Environmental, Societal and Social Engagements	Yes (copyrights)	No



Libération			
National press	Ethical chart and Editorial Independence Pact	No	No
Le Monde			
National press	Ethical and Deontological Chart	Yes	Yes
Mediapart			
Digital native daily news	Ethical and Deontological Charts, Contribution Chart	No	No
Paris Match (Lagardere/Bolloré Group)			
Commercial media group	Deontological Chart, Code of Ethics Ethical Chart (Group)	No	No
<i>French-speaking Belgian Market</i>			
Le Soir (Rossel Group)			
National press	Protection of Privacy	No	No
La Libre (IPM Group)			
Commercial media group	Ethical Principles	No	No
RTBF			
Public service media, Audiovisual	Deontological Chart, Privacy Chart	Yes (democracy)	Yes+

Source: Authors, November 2024

In contrast with these findings based on document analysis, several interviewees discuss the importance of internal guidelines for regulating AI’s role in the newsroom. Interviewee 15-Spain mentions the creation of an AI oversight committee to ensure that AI-generated content is clearly labelled and respects certain standards. Interviewee 13-Spain also describes a (non-official) “small decalogue” of rules requiring human oversight for AI-generated content, particularly to prevent AI from producing interpretative or evaluative content: “Everyone has been caught off guard, even the technology organisations themselves have been caught off guard. In other words, nobody expected it to jump so quickly”. Most have adapted their internal organisation:

Since 2022, we have strengthened the pre-existing governance. For all ethical issues, the Data Management Committee and the Editorial and Algorithms Committee are supposed to confront each other. One trying to find anything that might be of interest to the company, to promote it, to demonstrate its usefulness, which is not always easy. On the other hand, we must make sure that we have the necessary safeguards in place, given our public service values, which we must absolutely preserve. (Interviewee 40–Belgium)

Scholars have repeatedly stressed the importance of transparency in AI-driven news creation, alongside human involvement in information validation (Diakopoulos & Koliska, 2017). Without clear human oversight, AI could exacerbate misinformation and reduce accountability, thereby undermining public trust in news organisations:

We translate content from the Washington Post once or twice a week. This was impossible without the help of an artificial intelligence tool. And so, at the end of articles that are signed “Washington Post”, we display a block that is hyper-clear on how it’s done: it’s translated with the help of validated artificial intelligence tools, chosen by journalists, translated with, supervised by, and edited by humans. We try to be as detailed and transparent as possible. (Interviewee 37–France)

Media organisations that adopt AI without implementing rigorous editorial standards risk undermining their role as trusted sources of information (Banerjee et al., 2023; Blassnig et al., 2024). Finally, we have observed that these reflections and developments are also taking place thanks to professional organisations.

A call for public policies to tackle specific issues related to the use of AI in media

The interviews show that media face unique regulatory challenges when it comes to AI, as scholars such as Ouchchy et al. (2020) have noted. The debate on AI regulation is becoming increasingly significant due to the rapid evolution of AI and the complex ethical issues it raises, such as privacy concerns, intellectual property, and the risk of misinformation. “We are all trying to figure out how we anticipate, how we are going to do it and so on, but right now there is no conclusion because it is ongoing”, explained Interviewee 5–Spain. Several interviewees noted that while regulations and best practices are still evolving, organisations are adopting a “trial-and-error” approach to AI integration and testing its capabilities while waiting for clearer regulatory frameworks. Nevertheless, Interviewee 9–Spain argues that, despite this regulatory ambiguity, there is an implicit understanding within the organisation about the limits of AI use, particularly in areas like content generation. De-Lima-Santos et al. (2024) argue that sector-specific regulations, such as those being developed for media, are essential to ensuring that AI systems operate in a way that protects both consumers and the integrity of the information ecosystem. The certification of practices through the combined action of legislators and professional organisations is claimed:

Journalism is a profession, not a hobby. We have practices, we verify information, we have obligations, we have codes, we are accountable to the public, we have a mediator, we can be contacted, we are regulated... You can’t publish just anything with AI, for example, even though there’s nothing in the law to prevent it. But it’s not just the law. I think regulation is important, but so is the coalition of players around common actions. I’m thinking of RSF’s Trust journalism label initiative, for example, which is a way of certifying not news, but methods. (Interviewee 31–France)

Some legacy media also want to see their content treated differently from content produced exclusively by generative AI. For them, the objective is to define a label that can attest to the quality of a piece of information not for its own sake but according to the conditions under which it was produced. “It is certainly not a question of creating a ‘Ministry of Truth’, but of recognising virtuous professional practices,” explains Interviewee 37–France. On a European scale, professional organisations such as News Media Europe,

while acknowledging that the *AI Act* constitutes a “first step” towards protecting content-related rights, are urging public decision-makers to effectively implement the controls and sanctions provided for: “It is essential that the template for the sufficient level of information that General Purpose AI model providers must make available enables effective exercise and enforcement of copyright and other fundamental rights”.¹⁰

While self-regulation plays an important role, it is insufficient to address the challenges posed by AI. Interviewee 18-Spain, who represents a non-profit organisation focused on governance and transparency, notes that many efforts in the media sector are being driven by self-regulatory initiatives. However, Interviewee 17-Spain stresses that the current reliance on self-regulation lacks a holistic vision for digital transformation, and its societal implications: “How lost we are [...]. Media today are more worried about how to extract money from AI, instead of worried about how to extract value from AI”. Notwithstanding, a degree of scepticism about the current state of implementation arose during the interviews. Media organisations often seem to be waiting for clearer regulatory signals, but in the meantime, their implementation of AI technologies remains inconsistent (de-Lima-Santos & Ceron, 2021; Diakopoulos, 2019b; Nguyen & Hekman, 2024). Overall, it seems that real-world implementation lags behind regulatory discussions.

CONCLUSION

This study set out to investigate the conditions under which AI tools are integrated into European newsrooms within news media organisations from both organisational and regulatory perspectives, focusing on the French-speaking Belgian, French, and Spanish markets. Addressing the research question, “Under which conditions are AI tools integrated into news media organisations from both organisational and regulatory points of view?”, we employed two different methods, combining document analysis with in-depth interviews with media professionals and regulatory experts.

Our document analysis reveals a conspicuous scarcity of public debate and sector-specific regulatory guidelines surrounding the deployment of AI within media organisations. It also highlights the fragmentation of current regulatory frameworks and the absence of clear ethical standards adapted to journalism. The interview data confirm these regulatory gaps and provide deeper insights into organisational practices. Interviewees described the adoption of AI as largely experimental and cautious, with substantial variability across organisations and departments. They emphasized resistance to AI integration due to concerns over ethical implications, the weakening of editorial independence (van Drunen & Fechner, 2022), and risks related to optimizing visibility on distribution platforms. Interviewees also expressed concerns that AI-driven personalisation could erode editorial brands and public trust. Our interviews highlight the risk that the integration of AI tools into newsrooms increases fragmentation and task specialization, particularly in order to make content visible on distribution services. As a

¹⁰ Source: News Media Europe, *EU AI Act*: Joint statement from European creators and rightsholders, March 13, 2024, Online: <https://www.newsmediaeurope.eu/news/eu-ai-act-joint-statement-from-european-creators-and-rightsholders/>

result of this atomization of news and personalisation opportunities, the media's editorial charter, and the brand on which relationships of trust with the public are built are at risk of being weakened.

Moreover, our study highlights the fragmentation of current regulatory frameworks. The absence of clear, sector-specific guidelines in the markets analysed leads to inconsistencies in AI implementation and fails to adequately address AI's ethical and operational challenges in journalism. Additionally, the centrality of online platforms in news distribution has entrenched their dominant position, compelling media organisations to adapt their skills, technologies, and financial models to remain competitive. These dynamics risks undermining media pluralism and diversity by concentrating decision-making power within a few dominant tech entities. The growing influence of AI must also be understood in the context of contemporary dynamics of platform economics and the decision-making powers influenced by heightened concentration, especially of AI technologies.

To address the challenges identified in this study and to support the ethical integration of AI in the news media sector, we propose a series of recommendations that aim to enhance transparency, foster collaboration, and ensure accountability while empowering professionals and preserving the democratic values of journalism:

1. The adoption of transparent practices in content creation and distribution. This includes disclosing how AI tools influence editorial decisions, the nature of AI-generated content, and the data sources used, as already stipulated in the AI Act.
2. Promoting collaborative self-regulation initiatives among media entities can lead to the establishment of industry-wide ethical guidelines and best practices for AI integration.
3. Implementing comprehensive training programs to enhance AI literacy among media professionals, enabling them to effectively oversee AI-driven processes and ensure that human judgment remains central to editorial decision-making.
4. Establishing robust oversight mechanisms and accountability standards to monitor AI applications within media organisations, such as independent bodies to ensure compliance with ethical standards.

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Appendix

Interviewees their main role, and type of organisation they work for

Interviewee Code	Main Role of the Interviewee	Type of Organisation
1-Spain	Journalist, AI Expert	Legacy national media
2-Spain	Head of Digital	Legacy national media
3-Spain	Head of Big Data and Tech Innovation	Legacy national media
4-Spain	Head of Data Strategy	Legacy national media
5-Spain	Head of Digital Strategy	Legacy national media
6-Spain	Head of Tech Innovation	Legacy national media



7-Spain	Researcher for University Chair with PSM	Academic institution
8-Spain	Head of Innovation, Product Owner and Social Media	Digital native news outlet
9-Spain	Managerial position	Digital native news outlet
10-Spain	Head of Digital Marketing and Audience	Commercial media group
11-Spain	Head of Audiences	Legacy national media
12-Spain	Head of Digital Strategy	Digital native news outlet
13-Spain	Managerial position	Digital native news outlet
14-Spain	Head of Social Media	Legacy national media
15-Spain	Chief Data Officer	Commercial media group
16-Spain	Managerial position, Head of Digital Strategy	Legacy national media
17-Spain	Managerial position	Media umbrella organisation
18-Spain	Media Governance Lead	Non-profit organisation
19-Spain	Legal and Policy Expert	Academic institution
20	Senior Legal Counsel	Umbrella organisation
21	IP Senior Legal Counsel	Umbrella organisation
22	Legal Counsel	Umbrella organisation
23	Senior Legal Counsel	Umbrella organisation
24	Senior EU Policy Advisor	Umbrella organisation
25	Head of Software Engineering	Umbrella organisation
26-France	Head of Innovation, Data and AI	Commercial media
27-France	Head of Digital	Commercial media
28-France	Managerial position, Head of Digital	Legacy national media
29-France	Head and Director of Publication	Digital native news outlet
30-France	Head of Digital	Legacy national media
31-France	Deputy Head of Digital	Legacy national media
32-France	Managerial position, Head of Legal Affairs	Legacy national media
33-France	Head of Digital	Commercial media
34-France	Head of the Digital Edition	Legacy national media



Interviewee Code	Main Role of the Interviewee	Type of Organisation
35-France	Editor-in-Chief, Head of Strategy and Deontology	Legacy national media
36-France	Head of Innovation	Legacy national media
37-France	Head of Digital	Commercial media
38-Belgium	Journalist, Product Owner	Legacy national media
39-Belgium	AI Expert	Commercial media
40-Belgium	Chief Data Officer	Legacy national media
41-France	Deputy Head of Digital	Legacy national media

ISTRAŽIVANJE ETIČKIH I REGULATORNIH IZAZOVA INTEGRACIJE UMJETNE INTELIGENCIJE U NOVINSKIM REDAKCIJAMA EUROPSKE UNIJE

Bruno Lefèvre :: Aina Errando :: Adelaida Afilipoaie :: Heritiana Ranaivoson :: Louis Wiart

SAŽETAK Umjetna inteligencija (UI) znatno je preoblikovala medijski krajolik u digitalnom okružju koje se brzo mijenja. Iako su se u posljednje vrijeme pojavile zakonodavne mjere i inicijative samoregulacije unutar industrije kako bi se odgovorilo na posljedice korištenja UI-ja, etički izazovi povezani s primjenom umjetne inteligencije u redakcijama Europske unije te načini na koje se medijske organizacije snalaze u regulatornim okvirima i internim inicijativama i dalje su nedovoljno istraženi. Ova studija nastoji popuniti tu prazninu ispitivanjem uvjeta pod kojima se alati umjetne inteligencije integriraju u medijske organizacije, iz organizacijske i regulatorne perspektive. Na temelju analize 30 ključnih dokumenata i 41 dubinskog intervjua s medijskim profesionalcima i regulatornim stručnjacima na trima tržištima EU-a, studija donosi ključne uvide: ograničen diskurs o korištenju UI-ja u medijskim organizacijama, značajne razlike u praksama implementacije te izostanak jasnih i provedivih regulatornih smjernica za rješavanje pitanja povezanih s novinskim sadržajem koji je generirala umjetna inteligencija.

KLJUČNE RIJEČI

MEDIJSKA REGULACIJA, DIGITALNO NOVINARSTVO, UMJETNA INTELIGENCIJA,
MEDIJSKA ETIKA, ALGORITAMSKO NOVINARSTVO

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DEFINING IMPARTIALITY IN EUROPEAN PUBLIC SERVICE MEDIA. A COMPARATIVE ANALYSIS OF THE BBC, RTÉ, AND VRT.

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ABSTRACT Amid growing criticism and political scrutiny, defining and operationalising impartiality has become essential for public service media (PSM). This research examines how impartiality is conceptualised across policy, editorial guidelines, and regulatory oversight in three Western European markets through a comparative analysis of documents from the BBC (United Kingdom), VRT (Flanders-Belgium), and RTÉ (Ireland). The article demonstrates that, first, while regulatory obligations enforce ‘impartiality’, clear definitions in policy documents are lacking; second, editorial guidelines on impartiality show that it should be perceived as a process rather than as a measurable, achievable state of journalistic performance. Finally, the article shows the increased importance of complaint mechanisms and gatekeepers addressing concerns about impartiality and its (audience) perception. Simultaneously, it demonstrates that existing assessments fall short in researching its complexity, contributing to the perception that impartiality is an achievable state of journalism that can be achieved in news reporting by journalists.

KEYWORDS

PUBLIC SERVICE MEDIA, IMPARTIALITY, INDEPENDENCE, BALANCE,
VIEWPOINT DIVERSITY, POLICY ANALYSIS

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INTRODUCTION

The concept of impartiality emerged at the BBC a century ago in response to demands for public broadcasters to provide balanced reporting and protect their independence from commercial and political interests (Bélair-Gagnon, 2013, p. 481). Since then, impartiality, alongside fairness, accuracy, independence, and accountability, has become a core journalistic value for public service media (PSM) (Cushion et al., 2017; EBU, 2012; Sambrook & Cushion, 2024). The *European Media Freedom Act* (EMFA) states that “public service media providers play a particular role in the internal market for media services by ensuring that citizens and businesses have access to a diverse content offering, including quality information and impartial and balanced media coverage” (2023, p. 7). Similarly, the European Broadcasting Union (2012) highlights impartiality as a fundamental editorial principle safeguarding PSM independence.

Although criticism of perceived bias in PSM reporting has been a recurring theme throughout public broadcasting history, recent years have seen intensified scrutiny and political attacks accusing PSM of failing to represent all societal views. In the United Kingdom, debates surrounding a perceived “political correctness” and alleged left-wing bias have shaped discussions about the BBC’s remit and public purposes. These issues also arose during the appointment of the current BBC Director-General, Tim Davie, who was said to be appointed in part to deal with the BBC’s “wokeness” (Thorpe, 2020). The controversy over BBC personality Gary Lineker’s social media comments on government policies further underscored both the difficulties and delicacies of impartiality for the BBC, as elaborated in the section on the UK context and analysis (Glynn & McIntosh, 2025). Similarly, in Flanders, political rhetoric prior to the renewal of VRT’s management contract in 2020, mainly from centre and (radical) right-wing parties, emphasised a perceived clear need for a “more neutral” broadcaster and enhanced scrutiny of its “neutrality”. In Ireland, socio-cultural and economic divides between rural and urban, progressive, and conservative audiences have been reflected in criticism of RTE’s reporting (Raats et al., 2022). Globally, populist and radical voices have increasingly challenged legacy media’s legitimacy, further eroding public trust in news provided by these organisations (Sehl et al., 2020; Wolleschensky & Sehl, 2025).

For PSM, defining impartiality and devising strategies to achieve it in newsrooms and programming have gained prominence at the European policy level. Consequently, guidelines and regulations addressing impartiality have become embedded in regulatory frameworks and editorial codes. However, scholarly analyses, particularly those focusing on the BBC (Bélair-Gagnon, 2013; Cushion et al., 2017; Hughes et al., 2023), have identified normative conflicts and complexities in defining impartiality (Ojala, 2021). Critics have argued that efforts to enforce impartiality may paradoxically undermine the political independence they seek to protect (Boudana, 2016; Mont’Alverne et al., 2023). As such, the concept remains ambiguously defined and its dual conceptualisation as non-partisanship and viewpoint diversity is often used interchangeably with related values such as neutrality and objectivity. Finally, studies attempting to measure impartiality highlight

the challenges of capturing the intricacies of impartiality and viewpoint diversity (Masini et al., 2018; Masini & Van Aelst, 2017).

This research examines how impartiality is defined and implemented in PSM policy and strategy across European contexts. It explores whether regulatory definitions and guidelines function as mechanisms to enable and safeguard PSM independence or, conversely, constrain it. Specifically, the study addresses three key questions: (i) How is impartiality defined and operationalised at the levels of policy, editorial guidelines, and regulatory oversight? (ii) What are the core dimensions constituting editorial guidelines on impartiality? (iii) How is impartiality monitored internally and externally? Using a comparative case study approach, further explained in the methodology section, this research focuses on three PSM organisations: the BBC (United Kingdom), VRT (Flanders-Belgium), and RTÉ (Ireland). The analysis is based on a review of policy documents, government charters, management contracts, editorial guidelines, as well as additional regulatory contexts to understand decisions made by these broadcasters and the relevance of impartiality in each case.

This contribution fills a gap in PSM research by focusing on the regulatory definitions and applications of impartiality in PSM editorial codes. It adds to the growing body of literature on the transformations of PSM independence and legitimacy in Europe's evolving political and societal landscape. Drawing on existing scholarship on impartiality and PSM, the article formulates a definition of impartiality rooted in non-partisanship and viewpoint diversity while addressing its problematic nature across policy frameworks, internal guidelines, and regulatory oversight.

THEORISING IMPARTIALITY BEYOND DISCOURSE: NON-PARTISANSHIP AND BALANCE

Research on impartiality is an established part of the field of journalism studies, that so far has included a wide array of topics and stakeholders. Broad studies examining journalistic practices contextualise impartiality within discussions on disinformation and trust (Boudana, 2016; Ojala, 2021; Sehl, 2024). Comparative case studies employing qualitative methodologies further contribute to the field, such as Mont'Alverne et al.'s (2023) investigation of public perceptions of impartiality. Much of the existing research focuses on public broadcasters in Europe, addressing challenges in navigating populist criticisms and their role within a dynamic digital news environment (Michalis & D'Arma, 2024; Rodríguez-Castro et al., 2024). Among these studies, the BBC is often highlighted as a central case, owing to its reliance on policy documents and editorial guidelines to ensure impartiality (Cushion et al., 2017; Hughes et al., 2023; Sambrook & Cushion, 2024).

Across these studies, impartiality is consistently analysed in relation to values such as objectivity and neutrality, though interpretations of their interrelation vary. Some scholars argue for their interchangeability; for instance, Ojala (2021) conceptualises impartiality as a dimension of neutrality, together with non-interference. By contrast,

Cushion et al. (2017) argue for its distinctiveness, noting that objectivity aims to uncover singular, empirical truths, whereas impartiality recognises contestations of truth. In this interpretation, editorial guidelines encourage journalists to present “the most truthful versions of the truth” (p. 211).

A shared conceptualisation of impartiality in the literature combines two core elements: non-partisanship and viewpoint diversity. Cox (2007, cited in Wahl-Jorgensen et al., 2017, p. 783) defines impartiality as an attempt to regard differing ideas, opinions, and interests with detachment. The first element of non-partisanship, according to Boudana (2016, p. 603), is essential for maintaining journalistic independence and protecting PSM from political interference and commercial pressures. Establishing non-partisanship enables public broadcasters to position themselves as independent entities, distinct from state-controlled media, thus safeguarding editorial autonomy and legitimising their public mission (Barwise & York, 2020). The second element, viewpoint diversity, entails representing a broad spectrum of societal perspectives (Donders, 2021; Wahl-Jorgensen et al., 2017). Cushion and Lewis (2017) differentiate between objectivity, which seeks factual accuracy, and impartiality, which emphasises balance by allocating equal space to opposing views. This balance aligns with the academic concept of “viewpoint diversity,” associated with plurality and universality (Napoli, 1999). Presenting diverse viewpoints ensures that citizens are exposed to a wide array of information, fostering informed citizenship. In this context, impartiality aims to mitigate bias and present contested truths as transparently as possible.

Despite this conceptual framework, scholars are divided on the practical value of impartiality for PSM. Some scholars focus on impartiality as prescribed by editorial guidelines (Cushion & Lewis, 2017; Hughes et al., 2023). Boudana (2016, p. 603) critiques impartiality as an impractical standard, arguing that its implementation can paradoxically introduce bias into news reporting. She advocates for replacing impartiality with fairness, which she considers more feasible to operationalise. Meanwhile, evaluations of impartiality, often commissioned by governments or PSM, tend to focus on specific types of coverage and employ multi-methodological approaches, yet they seldom produce conclusive evidence of bias (Blastland & Dilnot, 2022; Van Aelst et al., 2024; Wahl-Jorgensen et al., 2017).

Operationalising impartiality presents additional challenges. More diversity in the representation of actors in news coverage may suggest broader viewpoint diversity (Masini et al., 2018; Masini & Van Aelst, 2017), but achieving meaningful balance, particularly in multiparty political systems, is fraught with complexities. Furthermore, normative debates on the content featured and the weighting of opinions often result in hierarchies, particularly when addressing radical perspectives (Hopmann et al., 2012). Nonetheless, combining qualitative assessments of impartiality with quantitative analyses of actors represented in news content has added depth to recent studies of impartiality, generally commissioned by national monitoring agencies (see Jigsaw Research, 2024; Sumption, 2024; Van Aelst et al., 2024).

In summary, academic literature generally embraces a twofold conceptualisation of impartiality, encompassing non-partisanship and viewpoint diversity. However, disagreements persist regarding its practical application and value for PSM. These arise from conceptual ambiguities, operational challenges, and the absence of clear benchmarks, underscoring the need for further research to clarify the role of impartiality in public service broadcasting.

METHODOLOGY

This study addresses persistent concerns regarding impartiality in PSM by conducting an in-depth analysis of how the concept is defined and operationalised within these organisations. We employed a comparative case study approach, identifying three case studies – the BBC, VRT¹, and RTÉ. The three PSM entities are classified in the model of Hallin and Mancini (2004) as democratic corporatist (Belgium) and liberal (Ireland, UK). These two models are similar in demonstrating (i) high professionalism in journalism, (ii) an approach of media freedom actively protected with limited political parallelism, (iii) formal differentiation between government-appointed oversight and managerial decisions, and (iv) a newsroom that acts independently overseeing its own editorial strategy. These similarities are reiterated in the State Media Monitor, mapping PSM typologies based on editorial independence, funding, and degree of state ownership (Dragomir, 2025, p. 76). In this model, VRT and RTÉ are classified as Independent State-Funded and State-Managed (ISFM), and the BBC as Independent Public (IP) (p. 77). However, their operation within increasingly polarised societies (Cushion & Thomas, 2019; Raats et al., 2021, 2022) and their exposure to intensified criticism by political actors and other stakeholders remain pressing issues. Furthermore, all three PSM have formalised definitions and operationalisations of impartiality within their regulatory documents and internal editorial guidelines. Despite financial constraints, they maintain control over their own managerial structures and continue to play a significant role in their respective media markets, supported by funding models and management contracts that enable a comprehensive PSM framework (Raats et al., 2022).

The analysis relies on a qualitative document analysis (Puppis, 2019) of a curated selection of documents that explicitly reference impartiality. These include management contracts, media regulations, internal editorial guidelines, and independent monitoring and evaluation reports. This approach ensures a thorough examination of how impartiality is defined, implemented, and assessed across different levels. At the policy level, the analysis focuses on how impartiality is articulated within management contracts and broader media regulations. For internal editorial guidelines, attention is directed towards the practical application of impartiality in journalistic content and staff behaviour. At the level of regulatory oversight, the study examines the ways in which reports assess impartiality, as well as how relevant complaints are addressed by editorial staff. The analysis did not extend to rulings regarding breaches of impartiality due to their volatile nature, as in the latest case of the Ofcom ruling on GB News and their prominence in the UK (Ofcom, 2025).

¹ Citations from VRT documents have been translated by the authors

We used MAXQDA software for qualitative analysis to code documents according to these three levels. We coded documents to isolate and compare existing definitions, links between impartiality and other relevant values (e.g. objectivity, pluralism), and relevant sections of documents, identifying relevant dimensions as discussed in the analysis. This allowed for a systematic analysis of definitions, guidelines for the implementation and evaluation of impartiality, and the formulation of lessons learned across the three cases. By addressing these distinct levels, our research presents a comprehensive understanding of the multidimensional nature of impartiality within PSM.²

CONTEXTUALISING THE INCREASED ATTENTION FOR IMPARTIALITY IN PSM POLICYMAKING

Defining impartiality does not occur in isolation. Public contestations, stakeholder demands, and political perceptions of the role and value of PSM contribute to scenarios in which impartiality must continually evolve and adapt.

The renewal of the latest *BBC Charter*, which came into effect in 2016, began with an inquiry into the BBC's future and a consultation paper issued by the Department for Digital, Culture, Media and Sport (DCMS). A significant change was the closure of the BBC Trust as the oversight body, with its responsibilities transferred to the Office of Communications (Ofcom), a government-approved regulatory body. This shift drew criticism due to fears that it might undermine the BBC's independence from political influence. Even with these structural changes, criticism of impartiality persisted in policy discussions and audience feedback as highlighted in its 2024 Mid Term Review (Carrell, 2022; Secretary of State for Culture, Media and Sport, 2024; Waterson, 2022). Currently, both Ofcom, as national regulator, and the BBC Board commission reports on impartiality, analysing audience reception and reviews of relevant news topics, such as taxation and public spending in 2022 and migration coverage in 2024 (Blastland & Dilnot, 2022; Jigsaw Research, 2022b, 2024; Sumption, 2024).

A notable recent controversy involved the suspension of Gary Lineker, the BBC's highest-paid sports commentator, over a tweet criticising the government's migration policy, which led to his early departure from the broadcaster in 2025 (Glynn & McIntosh, 2025). The public backlash regarding his suspension led the BBC to reassess its social media guidelines, which were subsequently updated in September 2023. Impartiality was also a focal point in the 2021 Serota Review, leading to the 2022 *Impartiality and Standards Action Plan* and amendments to the 2016 *Agreement* accompanying the *BBC Charter*. These reforms were further bolstered by thematic reports on impartiality drivers, reviews of taxation, public spending and migration (Blastland & Dilnot, 2022; Jigsaw Research, 2022b, 2022a, 2024; Sumption, 2024). More recently, the BBC Mid-Term Review highlighted ongoing concerns about impartiality, pointing to low audience trust (Secretary of State for Culture, Media and Sport, 2024).

² The overview of the relevant documents used for the analysis is available to access on Zenodo, an open online academic data repository, via the following link [10.5281/zenodo.15690749](https://doi.org/10.5281/zenodo.15690749).

RTÉ's commitment to pluralism and representing diverse viewpoints became central to its strategy in the mid-2000s, coinciding with significant migration trends from rural areas to urban centres and discussions around cultural cohesion (Raats et al., 2022). However, since 2023, RTÉ has faced considerable challenges due to financial scandals involving a lack of transparency around payments and questionable practices. These issues led to internal transformations, including changes to its board and chairperson, and strained relationships with political stakeholders (Newman et al., 2024). The relationship between RTÉ and the Irish political party Sinn Féin remains particularly strained, following a defamation lawsuit filed by its president (Leahy, 2022) and recent calls by the party to review the objectivity of the public broadcaster (Press Association, 2024). Despite these challenges, the Digital News Report confirmed RTÉ as the most-consumed media outlet in Ireland, highlighting its continued cultural significance and commitment to innovation and quality content (Newman et al., 2024).

In Flanders, the 2019 elections witnessed a rise in right-wing votes, fuelling ongoing debates about the perceived bias of legacy media. Critics argued an overemphasis on climate protests and the 'green wave' at the expense of less progressive and less urban perspectives. The strong language of the government agreement was slightly tempered in the Media Policy Letter, which reframed neutrality as a combination of independence, editorial autonomy, and impartiality (Dalle, 2019). The new 2024 government, which includes centre and right parties as well as social-democrats, again places impartiality in its agreement, yet does not call for more stringent regulatory oversight (contrary to the previous government contract) (Vlaamse Regering, 2024, p. 187). This emphasis on impartiality continues efforts initiated in the 2019 government agreement, which called for "the highest standards of neutrality in all programmes and more careful monitoring of that neutrality" (Vlaamse Regering, 2019, p. 135). The public broadcaster VRT faces continuous criticism from Vlaams Belang, a radical-right party, over its perceived lack of balance in reporting (Droeven, 2022; Vlaams Belang, 2023). Oversight of impartiality remains under the remit of the Flemish Regulator for Media (VRM).

While each PSM operates in distinct contexts, we note that common points of criticism related to impartiality emerge, including external pressures from political parties, high audience expectations in the news reporting of the public broadcaster, and the necessity for continuous maintenance of public trust.

MEDIA REGULATION, MANAGEMENT CONTRACTS AND IMPARTIALITY: ESTABLISHING RELEVANCE, NOT DEFINITION

An analysis of the regulatory obligations across the three prepublic broadcasters reveals that impartiality is consistently embedded in all relevant policy documents. However, all of the documents refrain from proposing rigid definitions of the concept. The UK *Communications Act* mentions impartiality explicitly in sections 319 on Ofcom's standards code and 320 on Special impartiality requirements (2003). The Irish *Broadcasting Act* (2009) presents impartiality as a prerequisite of reporting in article 39 on Broadcasters,

Duties, and Regulation. Meanwhile, the Flemish *Media Decree* (2009) distinguishes between impartiality in political and ideological terms in article 39 on General provisions for broadcasters. As such, in Flanders, impartiality is imposed to all broadcasters, whereas specific sections concerning VRT explicitly refer to objectivity, independence, and plurality of opinion-forming (2009, p. 13).

Management contracts and charters further define objectives and obligations related to PSM mandates. In the *BBC Charter* (2016) impartiality is discussed under two separate sections: the BBC's Mission and the Public Purposes. Impartiality is presented as a core aspect of journalistic reporting, together with high-quality, duly accurate, and distinctive output. Its goal is defined as enabling access to news with depth of analysis to "build people's understanding of all parts of the United Kingdom and of the wider world" (2016, section 6(1)). The RTÉ's strategy (2025-2029) discusses impartiality in the section on the goal to: "Engage audiences with high-quality impactful content", underpinning independent journalism and enriching public debates within democracy (RTÉ, 2024a, p. 20). Finally, VRT, in its contract, contextualises impartiality as part of neutrality (VRT, 2020). However, impartiality is also present in other sections of the agreement. For example, in the section on disinformation, filter bubbles, and echo chambers; impartiality is presented as necessary for factual and trustworthy reporting (VRT, 2020, p. 13). It is also interconnected with independence, trust, editorial autonomy, and accuracy in VRT's Strategic Goal 3: Reliable Information as a Common Reference Point (VRT, 2020, p. 26).

Again, in all three cases, impartiality is presented as a prerequisite for PSM's values and remit, yet none of the documents further define the concept. On the one hand, one can allege this opens avenues for discussions on whether or not these public broadcasters fail to uphold impartiality. On the other hand, the lack of definitions in media acts and contracts provides flexibility and autonomy for PSM organisations to define impartiality through internal guidance notes and editorial guidelines. Such an approach fosters adaptability and contextual relevance, enabling PSM to align the interpretation and application of impartiality with their unique operational frameworks and societal responsibilities. Furthermore, management contracts present specific nuances in relevant sections for impartiality, providing insights into its operationalisation in editorial guidelines.

OPERATIONALISING IMPARTIALITY IN GUIDELINES AND CODES: DIMENSIONS OF IMPARTIALITY

Dimension One: Impartiality is a Democratic Value Guiding Editorial Choices

Generally, definitions of impartiality provided in editorial guidelines elaborate on both non-partisanship and viewpoint diversity as was also the case in academic literature, albeit with PSM-specific nuances. There is a significant difference between the extensiveness of guidelines across the three cases, with the BBC having the most elaborate set of rules in its editorial guidelines and guidance. Guidelines across all three PSM emphasise the necessity to present diverse perspectives while maintaining independence.

Both RTÉ and the BBC discuss 'due impartiality'. RTÉ's content guidelines indicate that it is fundamental to "provide a breadth and diversity of views, in keeping with the requirements of due impartiality" (RTÉ, 2020, p. 8). The broadcaster explicitly defines aspects to adhere to impartiality such as (i) presenting a diversity of perspectives over time; (ii) taking no stance other than RTÉ's commitment to fundamental democratic rights; (iii) not favouring nor misrepresenting any perspective (RTÉ, 2020, p. 10). The most extensive definition of impartiality can be found in the BBC guidelines and guidance. According to the BBC, "[i]t means reflecting all sides of arguments and not favouring any side" (BBC, 2019, p. 1). The impartiality and editorial standards action plan reiterates that "We cover all sides of the story. [...] our news serves audiences with the facts, the analysis, and the insight they deserve" (BBC, 2021, p. 1). However, impartiality is primarily approached as 'due impartiality', defined as "[...] more than a simple matter of 'balance' between opposing viewpoints. We must be inclusive, considering the broad perspective and ensuring that the existence of a range of views is appropriately reflected" (BBC, 2019, p. 29). Furthermore, guidelines on the personal use of social media reiterate that "The reputation for impartiality is a huge benefit to the BBC, as well as an obligation, and should never be seen as a restriction, or as an inconvenience or anachronism" (BBC, 2023, p. 2). By defining it as such, impartiality is fundamental in guiding news reporting, ensuring sufficient viewpoint diversity.

VRT defines impartiality in the *VRT Program Charter* as understanding, respecting, and presenting diverse opinions relevant to society (2022, p. 10). The documents generally distance impartiality from neutrality, stating that "Impartiality is not the same as strict neutrality. We may take positions, but we do so in a well-considered, reasoned, fair, open-minded manner, considering the context, timeliness, nature of the subject and its potentially controversial nature" (VRT, 2022, p. 10). This definition of impartiality, together with independence and editorial autonomy, is part of goal 3.1: "VRT adopts a neutral stance in this respect, i.e., impartial, independent and acting from its editorial autonomy" (VRT, 2020, p. 27).

The use of 'due impartiality' and the rejection of strict neutrality present impartiality as a democratic value, guiding editorial decisions towards a balanced and accurate presentation of news.

Dimension Two: Impartiality Is as Much About Showing Different Viewpoints as It Is About Contextualising Different (and Extreme) Viewpoints

The second lesson drawn from editorial guidelines is its value in contextualising views on the basis of their weight in society. As such, engaging with news from an impartial perspective requires journalists to critically assess and contextualise viewpoints and actors while maintaining a nuanced balance reflective of the subject's complexity. To formalise this critical approach, the guidelines focus on the weight of voices and actors and address the inclusion of extreme viewpoints in a responsible manner, preserving the integrity and credibility of public service journalism.

The BBC states that “Our editorial standards do not require absolute neutrality on every issue or detachment from fundamental democratic principles” (2019, p. 7), and that “In applying due impartiality to news, we give due weight to events, opinion and the main strands of argument” (2019, p. 29). At VRT, guidelines on impartiality define weighing different opinions as “Reality is usually more complex than pro or con, black or white. Make sure there is room for nuance, shading and consideration or outline the weight a particular opinion carries” (VRT, 2015, p. 1). This is also explicitly described in the case of RTÉ: “We seek to maintain a balance of opinion that reflects the weight of the evidence, such as the consensus of contemporary scientific knowledge at the time of the broadcast, where this is relevant” (RTÉ, 2020, p. 8). As such, not all perspectives are equally presented as “Fairness does not necessarily require that all options on a subject are addressed or that differing views receive equal time” (RTÉ, 2020, p. 10).

The importance of proper contextualisation of opinions becomes especially relevant when dealing with radical, alternative, and controversial opinions. In presenting due weight, the BBC editorial guidelines state that “There is no view on any subject which must be excluded as a matter of principle, but we should make reasoned decisions, applying consistent editorial judgement” (2019, p. 46). Furthermore, Ofcom rules stipulate that there is no obligation to present alternative views in all broadcasts and that “There is no requirement on broadcasters to provide an alternative viewpoint in all news stories or all issues in the news. However, when reporting the news, presenters and reporters must take care that they do so with due accuracy and present it with due impartiality” (Ofcom, 2024, p. 7). Similarly, RTÉ specifies that following a scientific consensus “does not exclude alternative views per se. However, we are not obliged to provide a false equivalence” (RTÉ, 2020, p. 8). In addition, in its eighth out of ten ‘rules’ on impartiality provided to journalists, VRT states that “Extreme opinions should be allowed to be addressed. But then also make it clear that it is an extreme opinion. Give it weight and context” (VRT, 2015, p.1).

Therefore, based on relevant guidelines and codes, we find that all three PSM acknowledge impartiality as a process rather than an outcome. Providing different viewpoints does not imply journalists refraining from providing critical context, and that viewpoints can be ‘weighted’ depending on their societal value. Yet, at the same time, the analysis shows that guidelines invoke new questions adding to the complexity of day-to-day decisions: “When is an opinion ‘extreme’ or ‘deviant’?”, “What adds ‘weight’?”, and “In which cases is more ‘context’ required?”

Dimension Three: Impartiality Is Constructed Across Programmes and Genre

Editorial guidelines are equally as clear in delineating expectations regarding the scope of impartiality. This means that although a story can have different sides, guidelines warn against portraying all viewpoints and actors within one select news programme. News programmes in all three cases include both bulletins and current affairs programmes (BBC, 2019; RTÉ, 2020; VRT, 2012). In all three cases, impartiality is considered desirable within a series of programmes, defined best by the BBC as “pieces of content that deal

with the same or related issues and are editorially linked, within an appropriate period. This may include a strand with a common title; different types of linked programmes" (BBC, 2019, p. 33). The idea of "series of programmes" depends then on the complexity of the topic.

Though the scope of impartiality is consistently acknowledged across all broadcasters, its application varies. VRT and RTÉ only reference impartiality when discussing news (Coimisiún na Meán, 2024; VRT, 2022). However, the BBC guidelines extend the relevance of impartiality to also include drama and entertainment (BBC, 2019, p. 33). The BBC's inclusion of genres beyond news demonstrates a more complex operationalisation of impartiality, viewed as a value to be upheld across the entirety of BBC programming. Limiting impartiality to news is valid, yet at the same time shows their vulnerability to criticism on a perceived bias for cross-over genres or human-interest programmes. In Flanders, in particular, criticism resounded from politicians on a VRT satirical show *De Ideale Wereld* (*The Ideal World*) and a one-time documentary series depicting the political and personal life of only one of the political parties' presidents rather than all of them.

As much as news is central to understanding this dimension, defining what constitutes as "news" can still be subject to editorial interpretations. This may lead to conflicting interpretations on the applicability of impartiality, as exemplified by the Ofcom ruling on GB News, which has recently been overturned (Ofcom, 2025).

Dimension Four: Impartiality Applies Beyond Content, to On-Air Conduct and to Social Media Behaviour

As much as the content itself, impartial presentation of news by editorial staff is paramount for PSM. In our study, we find that impartiality is achieved also through the transparent and fair conduct of editorial staff, extending to freelancers in the case of VRT and RTÉ (RTÉ, 2020, p. 13; VRT, 2012, p. 2). At the BBC, guidance specifies that "All other BBC staff or freelancers are not required to uphold the BBC's impartiality through their actions on social media. They are however required to respect civility in public discourse and must not bring the BBC into disrepute" (BBC, 2023, p. 3).

In detailing the presentation of news, guidelines across case studies expect detachment and fairness by staff. This combination of values is described as key in conveying transparency about the political and economic independence of PSM to their audience. At the VRT presenters must refrain from portraying their views during broadcasts, being aware of their role without losing their authenticity (VRT, 2021). Similarly, Rule 5.4 of Ofcom concerning the BBC, states that "Programmes in the services must exclude all expressions of the views and opinions of the person providing the service on matters of political and industrial controversy and (...) public policy" (Ofcom, 2024, p. 13). RTÉ guidelines stipulate that "If your work specifically requires you to maintain your impartiality, don't express personal opinions on matters of public discussion, contention or debate, or politics" (RTÉ, 2021, p. 4). Guidelines further draw a connection between the behaviour of journalists and the perception of impartiality. For example, RTÉ's third mandatory obligation of

editorial integrity and independence states that “Any interest that could call into question the perceived fairness, objectivity or impartiality of a presenter or employee should be declared to the appropriate editorial manager” (RTÉ, 2020, p. 13). VRT’s integrity code encourages staff to “Avoid public statements that undermine confidence in the professional functioning and impartiality of VRT, including on social media” (2021, p. 7).

As such, for all three PSM, impartiality across programmes is only achievable when different viewpoints are paired with detached presentation and fair conduct of editorial staff. This focus on behaviour highlights the critical interplay between journalistic behaviour and the credibility of PSM. However, defining clear practices remains problematic, especially when crucial personalities are also freelancers, as in the case of Gary Lineker at the BBC (Glynn & McIntosh, 2025).

REGULATORY OVERSIGHT OF IMPARTIALITY: ASSESSING IMPARTIALITY

Monitoring impartiality involves both internal and external mechanisms. Internally, all three PSM have systems for receiving audience complaints about content and other aspects of their remit (BAI, 2011; BBC, 2020; Coimisiún na Meán, 2024; VRT Ombudsdienst, 2024). In each case, audiences must first submit complaints to the broadcaster before escalating them to the monitoring authority (Coimisiún na Meán, 2024; Ofcom, 2017; Van Aelst et al., 2024). At VRT, the Ombudsteam assesses the validity of complaints and reviews internal procedures. Since 2023 there have been two specific complaint reports, one concerning VRT and one concerning VRT NWS, the PSM’s news brand (VRT Ombudsdienst, 2024).

Media laws in the cases analysed do not provide explicit definitions of impartiality, but address external monitoring of their respective PSM. In the UK, the *Communications Act* (2003) entrusts Ofcom with monitoring impartiality, alongside presenting standards and guidance notes for the BBC to follow. Specifically, Ofcom’s mission is outlined in the *Communications Act*, provisions of part 5 of the 1996 *Broadcasting Act*, and the *BBC Charter and Agreement* (2003). An amendment to the *Agreement* (2022) also implements commitments by the BBC Board to oversee and report on editorial guidelines and plans, including those on impartiality. In Ireland, the Coimisiún na Meán monitors impartiality under the *Broadcasting Act* (2009), in combination with drafting broadcasting codes and rules. Its tasks are detailed in the 2022 *Online Safety and Media Regulation Act*, building on previous responsibilities of the Broadcasting Authority of Ireland (BAI) (BAI, 2013; Coimisiún na Meán, 2024). In Flanders, the Flemish Regulator for the Media (VRM) monitors VRT. Although impartiality is not explicitly mentioned in the *Media Decree* (2009), VRM’s responsibilities extend to all broadcasters, and a dedicated chamber for impartiality and protection of minors underscores its relevance (2009, p. 121).

In each of these cases, regulators delegate impartiality assessments to independent reviewers. For the BBC, the Board commissioned Jigsaw Research, a private international

analytics firm, to contribute to the 2022 report on drivers of perceptions of 'due impartiality' and audience studies on taxation (2022a, 2022b) as well as the 2024 audience research on migration coverage (Jigsaw Research, 2024; Sumption, 2024). In Flanders, VRM has been delegating reports on impartiality to an independent academic research team since 2021. At RTÉ, impartiality reviews are part of internal performance assessments addressing the goals outlined in its mandate. While impartiality is part of its remit, explicit external studies are lacking. However, RTÉ's annual reports regularly highlight impartiality as an operational risk mitigated through training and complaint processes (RTÉ, 2022, 2024b).

The methodological approaches in impartiality studies are comparable across the three broadcasters. The BBC's most recent thematic review combined audience studies, content analysis, and interviews with journalists and editorial staff (Jigsaw Research, 2024; Sumption, 2024). VRT's latest report focused on content analysis as outlined by VRM (Van Aelst et al., 2024). For instance, the 2024 thematic reviews at the BBC built on the recommendations by the Serota Review (Serota et al., 2021) and subsequent *Impartiality and Standards Action Plan* (BBC, 2021) as well as previous reports (Blastland & Dilnot, 2022; Jigsaw Research, 2022b). They assessed impartiality in content and internal structures through mixed methods to meet their objectives as set out by the BBC Board. By contrast, VRT's review included a comprehensive reporting on actors and themes in VRT's main news bulletin compared to VTM's 7 pm news; an analysis of actors and themes in VRT's current affairs programmes; and a detailed coding of three case studies on various platforms beyond VRT itself (Van Aelst et al., 2024).

The regulatory oversight shows preference for measurable and comparable assessments, often by comparing mentions of actors or minutes of attention; existing assessments also show the difficulties of grasping complexity and nuance, as research fails to capture the contexts in which viewpoints were presented. The research also shows the clear preference for examining political impartiality, over, for example, viewpoint diversity within economic, religious and cultural actors.

Table 1. Overview of Impartiality Across Levels of Analysis.

BBC	RTÉ	VRT
Levels		
Regulation		
The <i>Communications Act</i> (2003) and the <i>BBC Charter</i> (2016) establish impartiality as a fundamental value, without a strict definition. Ofcom and BBC Board are responsible for its oversight.	The <i>Broadcasting Act</i> (2009) and <i>Online Safety and Media Regulation Act</i> (2022) establish impartiality as a reporting requirement. The Coimisiún na Meán oversees RTÉ's adherence to these principles.	The <i>Flemish Media Decree</i> (2009) mandates impartiality for all broadcasters without strict definition. The Flemish Regulator for the Media (VRM) oversees compliance, and the government contract reinforces it as an objective.



Policy Context		
Impartiality is a recurring issue, with reviews highlighting audience trust concerns and high-profile controversies contributing to policy updates.	RTÉ has faced scrutiny due to financial scandals and perceived bias in political coverage, which influences discussions on impartiality.	Impartiality is a politically sensitive issue amid criticism from extreme right-wing parties. Government agreements further highlighting impartiality as core element of its public remit.
Editorial Guidelines		
'Due impartiality,' ensures an accurate presentation of viewpoints including journalists' (social) media conduct. It includes entertainment and drama beyond news.	Impartiality is framed as 'due impartiality', avoiding false equivalence and journalists' (social) media conduct.	VRT distinguishes impartiality from neutrality, emphasising fair positioning. Impartiality is primarily relevant for news, and journalists' (social) media conduct.
Regulatory Oversight		
Impartiality is assessed through external reviews. These employ a combination of qualitative and quantitative methods.	Impartiality reviews are largely internal, highlighting impartiality as an operational risk.	Independent academic studies are employed to assess impartiality through content analyses comparing VRT's news coverage to private broadcasters.

Source: Authors.

DISCUSSION AND CONCLUSIONS

This research set out to answer three core research questions on how impartiality is defined and operationalised, by identifying its core dimensions according to editorial guidelines, and how it is monitored at the BBC, RTÉ and VRT. First, our findings support the conceptualisation of impartiality as a combination of non-partisanship and viewpoint diversity. Across policy documents, editorial guidelines, and regulatory oversight, impartiality is formalised as a safeguard for balancing viewpoints and maintaining a non-partisan approach among presenters and journalists. At the policy level, we observed that legal acts and management contracts avoid defining impartiality rigidly, instead emphasising its relevance for the news remit of individual PSM. Arguably, this is a sound approach, as it allows impartiality to be an editorially defined concept, avoiding top-down operationalisations and consequent restrictions on the independence and autonomy of PSM.

Second, dimensions of impartiality are prominently featured in editorial codes and guidelines concerning news presentation and journalistic behaviour, both on-air and

on social media. From these findings, we derive four lessons highlighting the value of impartiality. First, impartiality serves as a democratic value guiding editorial choices, requiring balance and non-partisanship to inform decisions. Second, impartiality supports critical journalism by contextualising viewpoints according to their societal weight and responsibly including extreme voices to ensure credibility and accountability. Third, it functions as a thread across series of programmes, providing a comprehensive overview of relevant topics. Fourth, impartiality extends beyond content, encompassing the behaviour of journalists and editorial staff, which directly influences public perceptions of credibility and trustworthiness. These findings underscore the multifaceted nature of impartiality and its critical role in sustaining the legitimacy, independence, and adaptability of PSM across Europe. Finally, monitoring reports are inherently dependent on the scope provided by the commissioning agencies, as well as the time and means at the disposal of researchers involved. These are complemented by internal complaint systems allowing audiences to directly address PSM newsrooms.

Furthermore, definitions, dimensions and reports underscore potential discrepancies between expectations and audience perceptions of dimensions of impartiality and issues with monitoring. For example, even when guidelines are clear in delineating news as central to impartiality, PSM audiences may not necessarily make the same distinction and are more likely to be critical of all programming including and beyond news items. Similarly, attitudes of journalists on social media can be subject to audience interpretation, thus becoming a source of criticism.

Our findings lead to two fundamental recommendations for European policy. First, strict definitions of impartiality should be avoided. Top-down definitions risk being contextualised differently across nations, depending on power dynamics between governments and public broadcasters. Instead, PSM should retain the freedom to define impartiality within their internal guidelines, supported by European policy frameworks that reinforce its value as a democratic principle. Second, policy efforts should focus on creating frameworks that facilitate knowledge exchange among PSM across Europe. Platforms for sharing guidelines on independence, editorial freedom, and impartiality would enable PSM to collaboratively address shared challenges and enhance resilience.

Due to this inherent complexity and ambiguous definitions – such as the accurate evaluation of the weight of viewpoints or the appropriate timeframe concerning series of programmes – a holistic approach to regulatory oversight remains difficult to obtain. However, we found that the more complex the research methodology, the better the knowledge on impartiality within PSM. Future studies should examine how impartiality is constructed within PSM newsrooms and explore the extent to which regulatory frameworks influence daily journalistic practices. Additionally, research should continue investigating the evolution of impartiality in media policy, with a focus on comparative case study methodologies, highlighting rulings and operationalisations of existing guidelines.

In essence, while limited definitions and conceptual ambiguity surrounding impartiality can benefit editorial autonomy, an increasing political emphasis on impartiality paradoxically risks undermining the editorial independence it seeks to protect. This tension is further compounded by the unrealistic expectation that a perfect state of impartiality can be achieved, given the many contextual factors that shape news reporting. As such, our research should be embedded in the necessity of a fundamental repositioning of PSM in an ever-changing and challenging digital media landscape characterised by decreased funding and growing distrust in legacy media.

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DEFINIRANJE NEPRISTRANOSTI U EUROPSKIM JAVNIM MEDIJSKIM SERVISIMA: USPOREDNA ANALIZA BBC-JA, RTÉ-A I VRT-A

Michael Pakvis :: Tim Raats :: Catalina Iordache

SAŽETAK Usred sve izraženijih kritika i političkog nadzora definiranje i operacionalizacija nepristranosti postali su ključno pitanje za javne medije. Ovo istraživanje analizira kako se nepristranost konceptualizira kroz politike, uredničke smjernice i regulatorni nadzor u trima zapadnoeuropskim medijskim sustavima, i to putem komparativne analize dokumenata BBC-ja (Ujedinjeno Kraljevstvo), VRT-a (Flandrija, Belgija) i RTÉ-a (Irska). Članak pokazuje, prvo, da iako regulatorne obveze nameću potrebu za „nepristranošću“, jasne definicije u strateškim dokumentima često nedostaju; drugo, uredničke smjernice sugeriraju da se nepristranost treba promatrati kao proces, a ne kao mjerljivo i ostvarivo stanje novinarskog djelovanja. Konačno, članak ističe sve veću važnost mehanizama za podnošenje pritužbi i uloge „vratarâ“ (engl. gatekeepers) koji se bave pitanjima nepristranosti i percepcije publike. Istodobno se pokazuje da postojeće evaluacije ne uspijevaju u potpunosti obuhvatiti složenost toga pojma, što doprinosi percepciji da se nepristranost može jednoznačno ostvariti u novinarskom izvještavanju.

KLJUČNE RIJEČI

JAVNI MEDIJI, NEPRISTRANOST, NEZAVISNOST, URAVNOTEŽENOST,
RAZLIČITOST POGLEDA, ANALIZA JAVNIH POLITIKA

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THE BRUSSELS EFFECT ON DIGITAL PLATFORM REGULATION: ANALYZING THE BRAZILIAN REGULATORY PROCESS AND ITS IMPLICATIONS FOR JOURNALISM

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ABSTRACT *This article compares the European Union's digital platform regulations with Brazil's most advanced legislative proposal, Bill No. 2630/2020, reflecting the influence of the European framework, particularly the Digital Services Act (DSA). Through a documentary analysis, the article traces the history of communication regulation in Brazil, highlighting the challenges faced in advancing the issue. Comparing the Brazilian proposal to the DSA, both similarities, especially regarding platform transparency and algorithm functioning, and differences are noted, such as the inclusion of remuneration for journalistic content. The article also analyzes the "Brussels Effect", examining how this concept applies to the Brazilian context.*

KEYWORDS

REGULATION, PLATFORMS, BRAZIL, BRUSSELS EFFECT, JOURNALISM

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INTRODUCTION

Two years after the *General Data Protection Regulation* (GDPR) came into effect in the European Union, the *General Data Protection Law* (LGPD) took effect in Brazil, incorporating similar elements. A few years later, the approval and enactment of the *Digital Services Act* (DSA) in the European Union inspired several regulatory proposals around the world, including in Brazil, which is currently debating legislation regarding social media and platform payments to journalism. Following the Union's approval of the *AI Act*, Brazil is also debating a law on the use of artificial intelligence.

This phenomenon reflects what is known as the “Brussels Effect” (Bradford, 2020), which highlights the European Union's unilateral ability to regulate the global market through the approval of its own legislation. However, the reception and incorporation of these normative models do not occur linearly or homogeneously. In the Brazilian context, a distinct process of incorporation can be observed, where foreign legislation is combined with the country's specific demands. The regulation of digital platforms is a notable example of this movement. *Bill No. 2630/2020*, the most advanced legislative proposal on the subject in the National Congress, evidences the influence of the DSA but also points to a deviation from the European model by incorporating provisions that address the remuneration of journalistic content – a topic absent from the DSA but present in other international legislations, such as Australia's *News Media Bargaining Code*.

Thus, although the DSA does not include specific provisions on journalism, its structural influence on *Bill No. 2630* reveals the central role that European legislation plays as a normative reference. The fact that the Brazilian text has included the issue of journalism remuneration, albeit intermittently and controversially, indicates an attempt to condense multiple agendas – disinformation, algorithmic transparency, platform accountability, journalism sustainability – into a single regulatory instrument. This normative condensation also reflects a historical feature of communication regulation in Brazil: the absence of a structured public policy for the sector, which forces legislators to attempt to resolve, in a single proposal, issues that, in other contexts, are addressed in separate legislative packages.

In light of this context, the objective of this paper is to trace the history of regulation in Brazil and analyze the influence of international regulatory instruments, particularly the *Digital Services Act*, on the development of the most advanced Brazilian proposal currently under consideration in the National Congress. To this end, we conducted extensive documentary research to contextualize the scenario of (non)regulation of platforms in the Latin American country, compared the regulations based on previous research, and analyzed how journalism is incorporated into this framework.

Authors such as Campos et al. (2023) have already observed that several provisions in the DSA can be found, with varying degrees of adaptation to the local reality, in the Brazilian *Bill No. 2630/2020*, which has been under legislative discussion for four years. The proposal became popularly known as the “*Fake News Bill*” because it initially prioritized

the issue of disinformation. After the text was reworked entirely in early 2023 under the influence of the left-leaning administration of President Luiz Inácio Lula da Silva and civil society organizations defending the right to communication, it evolved into a proposal for regulating digital platforms.

Despite Brazil's historically unfavorable stance on communication regulation (Marques, 2020)¹, and more specifically, the current political situation with limited space for social media regulation (Ratier, 2024), *Bill No. 2630* represents the country's most structured effort in this field. It reflects debates that have already matured in other nations.

Not surprisingly, it faces strong resistance to its advancement in the legislature and public opinion. In the media and on social networks, an alliance between big techs and right-wing/extreme-right lawmakers – currently numerically hegemonic in both houses of Congress, the Senate and the Chamber of Deputies – has managed, since April 2023, to block the bill's progress, arguing that it poses a threat to freedom of expression in the digital environment.

In this context, the controversy over the remuneration of journalistic content by platforms also deserves attention. After being included in the original version of the substitute text, the provision was removed during the legislative process and is currently redistributed across different bills under discussion in the National Congress (*Bill No. 2630/2020*; *Bill No. 2370/2019*; *Bill No. 1354/2021*), signaling the difficulty of addressing journalism sustainability in an integrated way within platform regulation. This fragmentation reinforces the argument that Brazil lacks a more cohesive public policy model for the media ecosystem.

Thus, this study aims to understand how the European legislative framework, particularly the DSA, has influenced the construction of *Bill No. 2630*, with a particular focus on the gaps and adaptations related to journalism. The objective is to situate the debate within the broader perspective of importing and adapting legislation from the Global North by countries in the Global South, discussing the relevance, limitations, and risks associated with such transposition. To this end, we employ a qualitative methodology that combines documentary analysis and a literature review. Official legislative texts from the European Union, with an emphasis on the *Digital Services Act*, as well as the various versions of *Bill No. 2630/2020*, currently under discussion in the Brazilian National Congress, were examined. This analysis was complemented by an examination of the texts of Australia's *News Media Bargaining Code* and Canada's *Online News Act* to draw comparisons with the provision on journalism remuneration present in *Bill No. 2630*.

¹ A notable exception was the *Marco Civil da Internet* (MCI) (*Law No. 12965* of 2014), which aims to regulate rights, guarantees, and duties related to internet use. Article 19, concerning the liability of platforms for third-party content, has been controversial. Grounded in the principle of net neutrality, Article 19 of the MCI states that an internet 'application provider' can only be held judicially liable if it fails to remove content identified as infringing after a court order. At the time of writing, Brazil's Supreme Federal Court (STF), the highest judicial authority in the country, is conducting a trial on the liability of digital platforms for illegal content posted by users, with a tendency to revisit Article 19.

The approach adopted is based on a communication perspective, particularly concerned with the political, economic, and institutional impacts of platform regulation on the journalistic ecosystem. Although the legislative texts analyzed are legal, the study's focus is not on a technical-normative interpretation but rather on a critical analysis of how these regulatory frameworks interact with broader communication dynamics. Based on this empirical and theoretical foundation, we develop a comparison between European, Australian, Canadian, and Brazilian regulatory mechanisms, with special attention to the convergences, omissions, and adaptations that permeate the different proposals.

Accordingly, the paper is divided into seven sections. First, we provide an overview of historical attempts at communication regulation in Brazil, highlighting the absence of a robust legal framework focused on media and journalism. Second, we analyze the debate on journalism and digital platform regulation in Brazil. In the third section, we discuss the role of digital platforms in the journalistic ecosystem, further deepening our understanding of journalism's economic crisis and its dependence on large tech companies. The following section examines the European regulatory framework, with an emphasis on the *Digital Services Act* (DSA), outlining its key provisions. The fifth part of this article focuses on *Bill No. 2630* and compares it with the DSA, highlighting points of convergence and divergence. We then theoretically discuss the concept of the Brussels Effect, deepening its application to the Brazilian case and reflecting on its limitations when confronted with different political and structural contexts. Finally, we analyze the risks and possibilities of adopting foreign regulatory frameworks in the Global South, questioning whether the Brazilian strategy represents a viable path, a hasty shortcut, or a dead end in terms of sustainable and fair digital regulation.

BRAZILIAN MEDIA AND NEWS ECOSYSTEM: A HISTORY OF REGULATORY ATTEMPTS

In a seminal text, de Lima (2001) presents the Brazilian media ecosystem as an oligopoly, traditionally dominated by a few families with a significant overlap between economic and political elites throughout the 20th century. This diagnosis stems from a historical dynamic, as Marques (2020) identifies distinct phases that began with the proclamation of the Brazilian Republic in 1889, summarizing that regulatory attempts have been marked by limited advances and recent setbacks.

During the so-called Old Republic (1889-1930), the media had an incipient and regionalized character with little national influence. Media regulation was not a priority; most communication vehicles were privately owned, with strong political alignment, and opposing views faced government arbitrariness (censorship and closure of publications).

In the Vargas Era (1930-1945), then-President Getúlio Vargas – who rose to power through a coup and later became a dictator – implemented stricter control over the media, creating the Department of Press and Propaganda (DIP) in 1939, which centralized content production and censored the opposition. The intensification of government

censorship was renewed during the Military Dictatorship (1964-1985), while the central administration favored the concentration of power in the hands of large media groups, such as Globo. The media was used as a propaganda tool for the regime, and opposition vehicles were marginalized.

With the immediate post-redemocratization period (1985-2002), a political opening occurred, but media regulation did not progress significantly. The 1988 Constitution prohibited media monopolies and oligopolies, but these provisions were not effectively regulated.

According to de Lima (2001), the liberal wave initiated during the presidency of Fernando Henrique Cardoso (1994-2002) did not change the scenario. On the contrary, appealing to market competitiveness, the privatization of the communications sector, especially after the sale of Telebrás (the former state-owned Brazilian telecommunications company), consolidated a scenario of private oligopoly in place of state monopoly. Large transnational groups such as MCI (WorldCom), Telefónica de España, NEC, and Portugal Telecom partnered with national conglomerates (such as Globo, Bradesco, and RBS) to control the sector's major companies.

For the author, as had already occurred in the ownership of newspapers, radio, and TV, the privatization policy favored concentration in new technological platforms, allowing a few groups to dominate strategic segments – fixed telephony, mobile, satellite, and subscription TV. The result, according to the author, would be deregulated and concentrated markets, cross-ownership, and the loss of state control over a sector vital for national security and identity (de Lima, 2001).

The Workers' Party's (PT) arrival in power (2003-2016) sparked a greater discussion on the need for media regulation, providing a historical platform for the left-wing party (Marques, 2020, p. 176). Focusing on the democratization of access to information and combating the concentration of media ownership, the PT advocated for the creation of a regulatory framework for the media, including the prohibition of cross-ownership and limiting media ownership by politicians. Media regulation was discussed at the 2009 National Communication Conference (Confecom), which brought together representatives from the government, civil society, and the business sector. However, the proposals did not advance in the legislative environment, where many lawmakers either own media outlets or have connections with large media groups.

The impeachment of President Dilma Rousseff and the rise of the governments of Temer and Bolsonaro (2016-2021) marked a setback in media regulation policies, especially under Jair Bolsonaro (2019-2021), when media regulation was entirely abandoned. Bolsonaro opposed any form of regulation, arguing that it would be a threat to freedom of expression. In September 2021, the government attempted to issue a *Provisional Measure* (MP) – a normative act enacted by the President of the Republic with the force of law, applicable in cases of relevance and urgency, and valid for a maximum of 120 days – aimed at combating content removal on social media platforms. The MP was rejected by

the President of the Senate a week later, on the grounds that it introduced abrupt changes to the *Marco Civil da Internet* (Brazil's Internet Civil Framework), allowed insufficient time for compliance, and imposed immediate liability for non-compliance with its provisions. Bolsonaro also favored media outlets aligned with his government, such as TV Record and SBT, in the allocation of government advertising funds – an important revenue source for media vehicles.

In fact, the International Media Ownership Monitor (MOM, 2017) survey conducted in Brazil in 2017 indicates a high concentration of audience and ownership, as well as high geographic concentration, a lack of transparency, and interference from religious, political, and economic interests. Regarding regulation, MOM pointed out that Brazil's legal framework is insufficient to combat media concentration and the lack of transparency regarding media ownership. The lack of a robust regulatory framework results in a media landscape still dominated by a few groups, undermining pluralism and the diversity of voices. In summary, the entire structure of the regulatory frameworks that remain in Brazil originates from the Military Dictatorship (1964-1985), which consolidated a regime of bargaining with political and economic leaders (Marques, 2020, p. 2020).

THE DEBATE ON JOURNALISM AND PLATFORM REGULATION IN BRAZIL

According to Marques (2020), media regulation has always faced strong resistance from large media groups, which argue that any form of regulation could be interpreted as censorship or governmental interference. The debate on the regulation of journalism and, later, platforms involves relevant political actors such as the already mentioned Workers' Party (PT); in civil society, the National Forum for the Democratization of Communication, with more than 500 affiliated entities, and the Coletivo Intervezes, a think tank on public policy for the sector; and the academic field, which has been addressing the topic for several decades (Marques, 2020, p. 176).

Regarding the regulation of journalism, the 2000s witnessed three significant developments. In 2009, the Federal Supreme Court, the highest Court in the country, revoked the *Press Law* of 1967, considering it incompatible with democracy, thereby leaving journalism without specific legislation. The Court also removed the requirement for a journalism degree, arguing that the barrier violated the free flow of information and freedom of expression. The proposal by the National Federation of Journalists (Fenaj) to create a Federal Journalists Council to oversee professional practice was rejected by the National Congress in 2004 after strong opposition from employers on the grounds of "censorship".

Regarding the debate on regulating platforms, the Brazilian Internet Civil Framework (MCI), officially *Law No. 12,965/2014*, is the primary legislation governing internet use in the country. There is intense debate about the constitutionality of the provision that

platforms can only be held accountable for third-party content after a court order has been issued. Currently, the constitutionality of Article 19 of the *Marco Civil da Internet* (MCI) – Internet Civil Framework, which establishes a regime of responsibility for Internet application providers – is being debated in the Federal Supreme Court (Alimonti, 2024).

Regarding digital platform regulation, Flew and Martin (2022) observe that in recent years, internet governance has evolved from a specialized niche to a central theme in academic, political, and social debates. This shift has been driven by multiple factors, including Edward Snowden's 2013 revelations about the NSA's mass surveillance, the connections between intelligence agencies and tech giants, the spread of disinformation and its electoral interference, as well as regulatory measures adopted by entities such as the European Union.

The authors highlight that underlying discussions about digital platforms are fundamental tensions between freedom and control, self-regulation and state intervention, and global interests versus national sovereignty. They argue that today's complex digital ecosystem demands innovative governance approaches, which may range from corporate accountability frameworks to more stringent state-led regulation.

Based on the political economy of the communication framework, Napolitano and Ranzani (2021) reject the neutrality of the network as a passive technological support. They argue that regulating digital platforms is crucial in the globalized scenario. Private and transnational companies are exerting oligopolistic influence over the public debate – mediating social and economic relations, controlling algorithms that personalize content, promoting echo chambers and filtering bubbles, and spreading disinformation, all of which threaten democracy and freedom of expression.

Without social or state control, the authors claim, content moderation is left to the companies themselves, creating a public space regulated by private interests and lacking transparency. Self-regulation is rejected, as is purely state regulation, which is typical of authoritarian regimes and tends to result in censorship, ideological persecution, user bans, and the emergence of clandestine or underground platforms.

Supporting the propositions of the Coletivo Intervenozes, the authors advocate for regulated self-regulation or co-regulation. This model involves participation from various members of society to balance the regulatory process, whether in decision-making or in the formulation of guidelines to be followed by platforms and supervised by a "specialized public body with a perspective of defending freedom of expression" (Napolitano & Ranzani, 2021, p. 190). Politically, this perspective materializes in proposals such as *Bill No. 2630/2020*, which will be discussed further.

JOURNALISM'S DEPENDENCE ON DIGITAL PLATFORMS

The transformations brought about by digital technology and globalization have led to structural changes that affect the journalistic profession, professional routines, and relationships with sources and audiences. According to Pereira and Adghirni (2011), these changes include the emergence of new forms of news production, digital convergence processes, and a crisis in journalistic companies. Journalism, as part of society, is reconstructed through the interaction of various social actors, including individuals, institutions, and concepts, that follow norms and conventions to coordinate their activities.

The changes imposed by the architecture of digital platforms and their business models have significantly impacted the structure of the public sphere, promoting its fragmentation and reorganizing historically central actors in mediating this space. Technological development and its centrality have transformed, as Nielsen and Ganter (2022) argue, the media environment in the 21st century into a more digital, mobile, and platform-dominated space.

This scenario significantly reshapes the functioning of traditional media, forcing it to rethink its practices, methods, and ways of gathering news. The centrality gained by platforms in recent years (van Dijck et al., 2018) has significant implications for the journalistic market as a whole, from its production to its distribution, including issues such as news disaggregation and the very way news is consumed.

This process is mapped in surveys such as the *Digital News Report*. The 2024 edition reveals that, in Brazil, news consumption occurs more frequently through social media (51%) than through television (50%) and print media (11%). In the country, only 19% of the population pays to consume news, which also reveals the crisis in the business model of news outlets (Newman, 2024).

Nielsen and Ganter (2022) refer to the scenario of deep dependence experienced by journalism as “platform power”, characterized by a power exercised by systems that are both social and technical, ultimately attracting various stakeholders. The authors argue that digital platforms ultimately empower these stakeholders while making them increasingly dependent, thereby creating asymmetrical relationships.

Guided by algorithms, timelines begin to prioritize content that generates higher engagement and longer viewing times rather than focusing on informational quality. According to Pyo (2018), this intermediary role has significantly impacted the news industry, forcing journalistic organizations to adapt quickly. This has transformed public participation into an essential news value, influencing newsworthiness criteria and strategies of journalistic companies to attract audiences.

With the public's preference for accessing news through platforms such as social media, news aggregators, and search engines, news organizations have become increasingly dependent on these platforms to reach their audiences and distribute

content. This dependence varies according to the size, business model, market position, and type of news each organization produces. In research with South Korean journalists, Pyo (2024) reports that even larger and more established journalistic organizations face more pressure to prioritize audience traffic, often compromising journalistic values.

The trend is toward deepening this dependence. In the 2024 edition of the *Journalism, Media, and Technology Trends and Predictions* report, Newman (2024) notes the deprioritization of news display by Meta, encouraging content creators instead of journalists to use their platforms. On X (formerly Twitter), the removal of headlines from post publications made it harder to distinguish news from other content.

Social media is disappearing from the radar as a source of audience for journalistic websites. Data from the analytics company Chartbeat, collected from nearly 2,000 news sites, shows that Facebook's aggregate traffic to news sites has decreased by two-thirds (67%) over the past two years, and traffic from X has dropped by half (50%).

According to the 2025 edition (Newman & Cherubini, 2025), disruption has reached search mechanisms with the integration of AI-generated summaries in Google Search, which may further reduce exposure to news links. New competitors, such as OpenAI and Perplexity, aim to revolutionize the search experience by combining advanced language models with real-time information indexes. OpenAI, Apple, and Amazon have struck deals with major publishers to use their content in AI-generated summaries.

Newman and Cherubini (2025) expect growth in platform taxation for the use of journalistic content, judicial action for using journalistic articles without authorization to train AI models, and the emergence of collaborative intermediaries who calculate the contribution of articles or outlets in AI-generated summaries, creating space for content remuneration. Politically, this perspective is materialized with proposals such as *Bill No. 2630/2020*, which will be discussed later.

Politically, this perspective was materialized with the introduction of Australia's *News Media and Digital Platforms Mandatory Bargaining Code*, which was pioneeringly implemented in March 2021. The bargaining code requires digital platforms to compensate journalists for their content. This agreement should be reached through direct negotiation; however, if no resolution is achieved, an independent arbitration panel is tasked with determining the payments (Australian Communication and Media Authority [ACMA], 2022). This proposal has inspired both Canada's *Online News Act*, passed in 2023, and Brazil's *Bill No. 2630/2020*.

In response to increasing regulatory pressures, technology companies have partnered with media organizations to support news production through programs, subsidies, and financial aid for journalism. A notable example is the Google News Initiative (GNI) Innovation Challenge, which has reportedly invested millions of dollars in journalistic projects in Latin America.

According to Mesquita and de-Lima-Santos (2024), the analysis of these initiatives makes it clear that the media organizations benefiting from them are trapped in a cycle of dependence: they hire additional personnel and implement technological advancements – often from Google itself – for a limited period, but do not achieve sustainability in their business models. It is also noted that the thematic capture of the developed agendas poses a challenge for independent and plural journalism.

EUROPEAN REGULATORY MECHANISMS

The scenario created by the platformization of society (van Dijck et al., 2018) has prompted emphatic responses from governments around the world, contrary to what cyber-libertarians once imagined, who believed that the digital space would be able to self-regulate. In the famous “Declaration of the Independence of Cyberspace”, activist John Perry Barlow (1996) calls on governments to leave the digital space alone.

It is not only those who dream of a free, open, and democratic online space who reject the idea of regulation; digital platforms, the most interested parties in this issue, also position themselves radically against it. Zuboff (2021) summarizes some statements, particularly those made by Google’s top executives. The leadership’s discourse against legislation includes arguments that technology advances faster than its understanding, making it impossible for well-crafted interventions, as well as the delay that regulation would bring by “impeding innovation and progress”.

Similarly, in early 2025, Meta’s CEO, Mark Zuckerberg, publicly spoke out against global regulation, stating that he would actively work with the US government to curb regulatory efforts, which he labeled as “censorship”². However, the stance of big tech companies is not limited to discourse; it is also manifested in concrete actions against legislation. When Australia passed its bargaining code, the country experienced a brief news blackout on Facebook, with Meta following through on its threat if the law were enacted (Bossio et al., 2022). The same occurred in Canada. In 2023, following the approval of the *Online News Act*, the company “began the process of ending news availability in Canada” (Meta, 2023). Unlike in Australia, however, the block on Canadian news has remained in place for nearly two years on the big tech’s social media platforms.

For Shoshana Zuboff, “this lack of legislation has been a critical factor in the success of surveillance capitalism in its brief history” (2021, p. 125). Indeed, the exclusive self-regulation model of digital spaces created a scenario conducive to both the expansion of digital platforms and the side effects of a business model driven by user attention and the surveillance and capture of their data.

² “We’re going to work with President Trump to push back on governments around the world. They’re going after American companies and pushing to censor more. The US has the strongest constitutional protections for free expression in the world. Europe has an ever-increasing number of laws, institutionalizing censorship, and making it difficult to build anything innovative there. Latin American countries have secret courts that can order companies to quietly take things down. China has censored our apps from even working in the country. The only way that we can push back on this global trend is with the support of the US government, and that’s why it’s been so difficult over the past four years when even the US government has pushed for censorship”, retrieved from <https://www.techpolicy.press/transcript-mark-zuckerberg-announces-major-changes-to-metas-content-moderation-policies-and-operations/>

It is important to note that although many of the regulations, or regulatory drafts, focused on digital platforms or digital services, emerged in the late second decade of the 21st century, this does not necessarily mean that the online space was completely unregulated. In the European Union, the *Directive on Electronic Commerce*, introduced in 2000, included aspects of information society services, particularly electronic commerce.

The directive was the first EU regime to establish a liability framework for online services. One of the fundamental pillars of the text was the introduction of the safe harbor principle for digital platforms and web hosting companies (Medeiros, 2024). This principle exempted such applications from liability for illegal content published by third parties, similar to Section 230 of the United States' *Communications Decency Act* (CDA), which shields providers from being treated as publishers or authors of third-party content. According to Leiser (2023), however, this approach has limitations and is inadequate for protecting society from illegal content, for instance.

In Brazil, as previously mentioned, the *Marco Civil da Internet* has been in effect since 2014, creating obligations and a liability system for online service providers. However, it is currently debated in the judicial sphere whether this remains the best framework to guide the digital space. In the Brazilian case, providers are also not held liable for third-party content, except in instances of non-compliance with a court order.

However, as is being debated in the three branches of Brazil's government and around the world, the rules need to be analyzed and revised in light of the ecosystem that has emerged and the centrality that actors have achieved in the global public sphere. In this sense, the European Union stands out as a significant agent, both due to the scope of the regulatory package it has approved in recent years and its political influence.

According to Leiser (2023), the *Digital Services Act* (DSA) emerges as both a renewal and a complement to the directive, aiming to harmonize regulation at the European Union level without entirely replacing it. The DSA adheres to the core principles of the earlier framework, such as the prohibition on general monitoring, but imposes more asymmetrical and stringent due diligence obligations (Leiser, 2023, p. 11).

In the text of the *Digital Services Act* (DSA), the European Union presents several justifications for implementing the legislation, which include the "proper functioning of the internal market for intermediary services" and ensuring a safer and more trustworthy online environment, concerning "the freedom of expression and information, the freedom to conduct a business, the right to non-discrimination, and the attainment of a high level of consumer protection" (DSA, 2022, p. 2).

In addition to the DSA, the EU has approved other legislation in recent years, such as the *General Data Protection Regulation* (GDPR), the *Digital Markets Act* (DMA), the *AI Act*, and the *Media Freedom Act* (EMFA), thus building a broad framework in this area and inspiring other countries.

The GDPR³, which inspired Brazil's *Lei Geral de Proteção de Dados* (*General Data Protection Law*), regulates the processing of personal data of EU residents, establishing rules for the collection, use, protection, and sharing of such information. Bueno and Canaan (2024, p. 5) note that the legislation enacted in 2018 has become the internationally recognized standard for data privacy, influencing both corporate practices and foreign legislation.

The *Digital Markets Act* (DMA)⁴, a sister regulation to the DSA, both approved simultaneously, aims to ensure competition and fairness in digital markets by limiting the power of platforms designated as gatekeepers. The DMA sets criteria to identify these major platforms and defines rules they must follow to prevent unfair practices. In Brazil, the press reported in May 2025⁵ that the federal government plans to submit a bill to Congress aimed at regulating digital markets as well.

The *AI Act*⁶, approved in 2024, establishes a regulatory framework for artificial intelligence in the EU, ensuring that the technology is developed and used in a safe, ethical, and responsible manner. It introduces a risk-based classification system for AI systems, imposing obligations based on the level of risk identified. The *European Media Freedom Act* (EMFA)⁷ is the most recent legislation adopted within this regulatory scope, which seeks to safeguard media freedom and pluralism in the European Union by protecting editorial independence, journalistic sources and preventing the unjustified removal of content, among other measures.

Since the focus of our work is to understand the mechanisms Brazil imported from other countries for the construction of a regulatory text, which has not yet been approved but was widely discussed in the National Congress, and its implications for journalism, we will focus on the DSA. This law was highlighted 25 times in the report of the Brazilian *Bill No. 2630/2020*, which will be addressed in the next section.

The objectives of the law include harmonizing the rules applicable to intermediary services within the European Union's internal market and preventing fragmentation arising from different national legislations. Thus, the DSA, proposed in 2020 and approved in 2022, aims to combat the spread of illegal content and misinformation, encompassing, for example, information related to illicit products, services, and activities, including hate speech and terrorist content.

The legislation also aims to provide greater legal certainty to intermediary service providers while protecting users' fundamental rights. To ensure the accountability of these providers, obligations of diligence proportional to the type, size, and nature of the services offered are established, a mechanism known as asymmetric regulation, in which actors of different sizes assume different obligations and responsibilities.

³ <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng>

⁴ https://digital-markets-act.ec.europa.eu/index_en

⁵ <https://istodineiro.com.br/proposta-para-aprovar-regulacao-de-mercados-digitais-esta-em-fase-final>

⁶ <https://artificialintelligenceact.eu/>

⁷ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy/european-media-freedom-act_en

Thus, the DSA creates cumulative obligations for intermediary services, hosting services, online platforms, and huge online platforms and search engines (VLOPs). According to data from the European Union, over 10,000 platforms are operating within the bloc, and 90% of them are small and medium-sized enterprises. The legislation, however, differentiates based on size, placing large platforms and search engines that reach more than 10% of the 450 million European consumers in a separate category, as they present high risks in the spread of illegal content and negative social impacts. Platforms such as Apple, Amazon, Meta, Google, TikTok, Microsoft, and others are included in these lists.

The DSA imposes, as a rule for all companies, regardless of service or size, the requirement to produce transparency reports, clarify in their terms of service the guarantee of fundamental rights, cooperate with national authorities through orders, and, when necessary, establish points of contact with a legal representative.

According to the European Union (n.d.), online platforms must maintain a complaint and extrajudicial dispute resolution mechanism, keep trusted flaggers to report illegal content, have measures against abusive notifications and counter-notifications, prohibit targeted ads to children and those based on sensitive user characteristics, promote transparency in recommendation systems, and ensure transparency in online advertising directed at users.

In addition, VLOPs also have obligations related to risk management and crisis response, must undergo external and independent audits, need to provide an option for users to opt out of receiving content recommendations based on their profiles, must share data with authorities and researchers, and maintain codes of conduct (European Commission, n.d.). Another central aspect of the legislation is the obligation of these large companies to assess the systemic risks of their services and implement measures to mitigate these risks.

According to Bueno and Canaan (2024), the DSA strengthens the EU's normative power and positions itself as a "regulatory laboratory" for a rights-oriented internet. The authors note that the regulation, like the United Kingdom's *Online Safety Act* (OSA), adopts a risk-based regulatory approach by introducing the concept of "systemic risk", which requires platforms to identify, assess, and mitigate risks arising from their structure, algorithms, and patterns of use. The OSA, in turn, incorporates the notion of a duty of care, which is also explored in Brazil's *Bill No. 2630*.

The DSA imposes additional obligations on companies, such as the requirement to publish regular transparency reports, the right of users to receive explanations regarding automated decisions, and the opening of data to the scientific community. Moreover, the DSA innovates by linking the protection of fundamental rights with technical and organizational mechanisms that aim to foster a safer and more transparent digital environment. Among its provisions are the prohibition of using sensitive data in personalized advertising, particularly targeting children, and the requirement to maintain a public repository of information on advertising campaigns (Leiser, 2023).

Given that the legislation covers a wide range of countries, direct oversight of Very Large Online Platforms (VLOPs) is assigned to the European Commission (Bueno & Canaan, 2024), which has the authority to impose administrative sanctions, including fines, alongside the Digital Services Coordinators of the Member States.

THE BILL NO. 2630/2020 AND THE INFLUENCE OF THE DIGITAL SERVICES ACT

The Brazilian *Bill No. 2630* emerged before the European Union's *Digital Services Act* (DSA) proposal. While the Brazilian text was presented in the Federal Senate in April 2020, the European proposal came in December of the same year. However, in Brazil, Bill No. 2630 was not initially intended to regulate digital platforms comprehensively. As Sanches and Nóbrega (2021) note, the original aim of the bill was to affirm truth and combat disinformation, responding to concerns over the spread of false information during the COVID-19 pandemic. Consequently, it became widely known as the "Fake News Bill". Only after its approval in the Senate and submission to the Chamber of Deputies did the bill undergo amendments that shifted its focus toward regulating platform architecture.

The first version of the bill faced intense criticism from Brazilian civil society and other stakeholders. During its time in the Senate, "the bill underwent a series of modifications that removed provisions that established any form of control over disinformation content" (Sanches & Nóbrega, 2021, p. 382). Although the Senate approved the text, it arrived in the House with a different character, still encountering significant obstacles in progressing.

The return of Luiz Inácio Lula da Silva to the presidency within a center-left coalition government has reopened the possibility of resuming the regulatory communication agenda, now focusing on digital platforms. The anti-democratic attacks of January 8, 2023, also brought a renewed sense of urgency to the issue. In early 2023, a revised version of *Bill No. 2630* began taking shape in the Digital Policy Secretariat of the Secretariat of Social Communication – Secom, an executive branch agency with ministerial status (Nóbrega, 2023a).

Pro-regulation civil society organizations significantly influenced the development of the new text. On May 4th, 2023, during a public hearing in the Chamber of Deputies, various pro-regulation civil society organizations – including Intervozes, Avaaz, Sleeping Giants, Diracom (Right to Communication and Democracy), Coalition Rights on the Internet, and Article 19 Legal Reference Center – came out in favor of the bill's revised version (HAJE, 2025).

Thus, the bill continued to evolve through public hearings, expanding its scope to regulate the digital environment – increasingly drawing inspiration from the *Digital Services Act* (DSA). Although the Brazilian proposal was presented earlier, it has not yet become law, and more than four years after its presentation in the House, it still has not been voted on. A significant factor contributing to this delay has been the intense

lobbying efforts of digital platforms, which have pressured lawmakers, as well as the strong political opposition fueled by the far right (Weterman & Affonso, 2023).

In May 2023, the bill was scheduled for a vote in the House, but it was withdrawn from the agenda due to insufficient support for its approval. During this time, digital platforms conducted vigorous lobbying efforts both within and outside Congress. For example, Google featured a link on its homepage in Brazil titled “The fake news bill could make your internet worse” (Paul, 2023), and Telegram sent a message to all Brazilian users warning that the bill would “end freedom of expression” and “kill the modern internet” (Galf, 2023). This situation led to an inquiry by the Federal Police, which accused the companies of abusing their economic power.

By this time, a significant change had occurred in the text from 2022⁸ to the version presented in 2023⁹, with a 44% modification, according to researcher Christian Perrone (Butcher, 2023). The previous version contained 38 articles, while the final version included 60. Among the factors that influenced these changes is the Brazilian political context – the country held general elections in 2022 and, on January 8, 2023, experienced the most significant attack on its democratic institutions since its re-democratization, with invasions of the headquarters of the three branches of government: Executive, Legislative, and Judiciary.

According to Perrone, the country’s political moment was compounded by new international legislation, such as the DSA, which was approved in October 2022. As a result, the new text of *Bill No. 2630/2020* incorporated these changes. In the document outlining the law and recording the process leading to its final form, the deputy cites the *Digital Services Act* 25 times, in addition to referencing the French and German experiences in regulating digital issues. This demonstrates both the study of other laws and the references used in constructing the Brazilian text.

Researchers such as Campos et al. (2023) examined the similarities and differences between the two texts in March of that year. According to the authors, the Brazilian experience could benefit from the expertise already embedded in the European text. The law firm b/luz¹⁰ also conducted a similar comparative analysis in May 2023, using the final version of the Brazilian bill. Overall, *Bill No. 2630* incorporates several principles introduced by the DSA. One of the most evident similarities, which was included after the European Union’s text was approved in its April 2023 version, is the concept of systemic risks.

In the DSA, Articles 34 and 35 establish that Very Large Online Platforms (VLOPs) must identify, analyze, and diligently assess systemic risks arising from their services, including algorithmic systems, covering the dissemination of illegal content and their impact on

⁸ In Portuguese, <https://www.camara.leg.br/midias/file/2022/03/fake.pdf>

⁹ In Portuguese, https://www.camara.leg.br/proposicoesWeb/prop_mostrarintegra?codteor=2265334&filename=PRLP+1+%3D%3E+PL+2630/2020

¹⁰ In Portuguese, https://baptistaluz.com.br/wp-content/uploads/2023/05/BLUZ_230511_ebook_PD_Analise-Comparativa-DSAxPL2630_20_v3.pdf

fundamental rights, civic discourse, electoral processes, gender-based violence, and the protection of minors. Similarly, Article 7 of *Bill No. 2630* adopts this approach by listing systemic risks and imposing a duty of diligence on platforms to identify, assess, and mitigate them, with a particular focus on their impact on fundamental rights, democracy, and public security.

Additionally, *Bill No. 2630* seeks to establish a differentiation regarding “who should be regulated”. The Brazilian legislation would apply only to providers with more than 10 million users – approximately 5% of the population. However, unlike the European legislation, it does not include a tiered system of obligations, and platforms with a smaller user base are not subject to regulation. While the European framework aims to regulate “digital services” in a broader sense, the Brazilian bill limits its scope to “social network providers, search engines, and instant messaging services”.

Another apparent similarity introduced by *Bill No. 2630* is transparency. This is one of the core concepts outlined in the DSA and is also reflected in the official name of the Brazilian legislation. Although commonly referred to as the “Fake News Bill” its official title is the *Brazilian Law on Freedom, Responsibility, and Transparency on the Internet*. Transparency is addressed in Chapter IV of the Brazilian legislation, whereas in the DSA, it is mentioned in multiple articles, including Articles 15, 24, 27, 39, and 42. In both frameworks, platforms are required to publish transparency reports every six months, explain how their algorithmic recommendation systems function, and ensure transparency regarding advertising. Another transparency-related provision concerns data access for researchers, which is explicitly included in European law.

Codes of conduct, external audits, and crisis response protocols are also topics present in both texts. Additionally, both legislative frameworks establish due process in content moderation cases, although the DSA provides more detailed guidelines on this matter, while the Brazilian bill leaves room for further development. However, there are also notable differences, particularly regarding the regulatory structure, which reflects the contrast between a national framework and a supranational bloc, as well as the absence of enforcement mechanisms in the Brazilian bill, raising ongoing concerns about the country’s capacity to implement the proposed measures (Bueno & Canaan, 2024). Other elements in the Brazilian text, such as the duty of care, draw inspiration from other legislative proposals, including Germany’s *NetzDG Law* (Soares, 2023).

It is evident that the *Digital Services Act*, which has significantly influenced *Bill No. 2630*, despite key differences, does not directly address journalism sustainability. Its contributions in this regard are primarily symbolic, linked to the protection of the digital public sphere, the promotion of transparency, and the establishment of content moderation appeal mechanisms. In Brazil, discussions have been held regarding the possibility of extending data access provisions to journalists in addition to researchers (Fenaj, 2023). However, this proposal was not included in the final version of the bill, nor is it a feature of the DSA.

Unlike the DSA, however, *Bill No. 2630* includes a specific section on journalism, which reveals an attempt by the Brazilian legislator to encompass multiple dimensions of digital regulation within a single legislative proposal. This choice, although understandable given the scarcity of sector-specific regulatory frameworks in the country, also highlights the structural challenges of legislative formulation in Brazil, especially when compared to the more segmented approach adopted by other democracies.

The legislators who drafted the Brazilian proposal drew inspiration from other initiatives addressing this issue, specifically from the *News Media Bargaining Code* in Australia. The proposal implemented in 2021 is based on the central idea that journalistic organizations “increasingly depend on platforms to reach their audiences and generate advertising revenue but are not adequately compensated for the use of their content and are unable to negotiate fairly without state intervention” (CGI, 2023, p. 15). The Australian legislation, therefore, argues that digital platforms should remunerate news organizations for the use of their content. Initially, this payment is to be determined through direct negotiation between the parties; if no agreement is reached, the amount is decided by an independent arbitration panel (ACMA, 2022). The Canadian *Online News Act*, enacted in 2023, proposes a similar approach.

In the Brazilian bill, the remuneration for journalistic content is also structured as a negotiation between the parties, with arbitration mechanisms in place in cases where an agreement cannot be reached – although the details of this process are to be regulated later. Additionally, the bill includes provisions on copyright in a separate chapter. The inclusion of this topic within a bill aimed at regulating digital platforms marks a crucial difference, as other countries tend to address these issues through separate legislation.

In Brazil, given the unfavorable political scenario and the strong opposition to the bill, which was labeled by critics as the “Censorship Bill” it is hypothesized that lawmakers included all these topics in a single proposal as a strategy to advance multiple agendas simultaneously. However, following the intense backlash against the bill in early May 2023, the bill’s rapporteur deputy attempted to “split” the text, transferring the provision on journalism remuneration to a separate bill focused solely on copyright to ease political tensions (Nóbrega, 2023b). This alternative bill, however, also failed to progress.

Although the DSA does not provide direct input for the Brazilian bill, the recently approved *European Media Freedom Act*¹¹ (EMFA) may serve as an inspiration for either a revised version of the bill or future proposals on the matter. While the EMFA, which came into force in May 2024, does not specifically address journalism remuneration, it introduces important safeguards for protecting the profession in the digital environment, such as moderation protections for journalistic content and incentives for media pluralism.

¹¹ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy/european-media-freedom-act_en

THE BRUSSELS EFFECT

This context aligns with what the scholar Anu Bradford (2020) defines as the “Brussels Effect”. According to her, the term “refers to the EU’s unilateral ability to regulate the global marketplace” (Bradford, 2020, p. 1), which may be unintentional but is ultimately a reflection of the size and attractiveness of the European market.

Bradford highlights that the Brussels Effect can manifest either *de facto* or *de jure*, differing in the mechanisms through which EU regulations spread globally. In the first case, European legislation extends its influence through corporate practices, meaning that no formal regulatory action is required for the rules to be adopted in other contexts. This occurs because multinational companies often find it more efficient and cost-effective to standardize their operations across all markets, particularly when the EU market is large and significant.

Based on the experiences analyzed, we observe that this strand of the theory does not necessarily apply to platform regulation. Many obligations imposed on large digital platforms within the EU have not been extended to the rest of the world. For instance, under the DSA, corporate transparency reports¹² cover only the European market, and access to data for researchers follows the same pattern.

Another example that illustrates platforms’ reluctance to extend their obligations beyond Europe is related to the GDPR. In June 2024, Meta initiated a process to request the consent of European users for the use of their data and content in AI training. This request was made in advance solely to comply with the *General Data Protection Regulation* (GDPR). In Brazil, the approach was different: there was no prior notice, but users could still object based on the country’s similar legislation – the *General Data Protection Law* (LGPD). However, in countries without equivalent regulations, this was not an option, as reported by *The New York Times* (Jiménez, 2024). This suggests that rules are effectively followed only in already regulated environments.

In their analysis of this issue, Bueno and Canaan (2024) interviewed experts from various sectors to understand the extent to which the DSA shapes the Brazilian draft law. Based on the interviews, the researchers conclude that there is no evidence of a *de facto* effect, as companies are not adopting the DSA as a standard global compliance, considering it too rigid and still in a testing phase. Another concern is that the adoption of aspects of the DSA could inspire other countries to adopt similar measures, potentially leading to a so-called “Brazil Effect”.

The second mechanism identified by Bradford (2020) occurs through legislative means, where the formal adoption of these rules may have been influenced by the *de facto* effect but also by other factors. The creation of similar legislation can result from corporate adoption, as companies may even begin lobbying for specific regulations to be implemented in other countries to level the playing field. This is particularly relevant in

¹² <https://transparency.dsa.ec.europa.eu/>

scenarios where multinational corporations must comply with the EU's stricter regulations while competing with local businesses subject to more lenient rules. However, Bradford (2020) notes that other factors, such as pressure from foreign consumer advocacy groups, can also influence the decision to adopt similar legislation.

Bradford emphasizes that these factors can be both pragmatic and normatively driven. Pragmatic factors include the accessibility of EU legislation, facilitated by its availability in all official languages of the Union, as well as historical and cultural influences inherited from colonial ties that many Latin American and African countries maintain. Additionally, the well-defined nature of EU regulations, designed to accommodate a wide range of countries, further supports their transposition into other legal frameworks.

On the normative side, the author Bradford argues that the quality of ideas influences this process, as does the Union's commitment to democratic values and fundamental rights: "The appeal of these principles means the EU sets a 'virtuous example', leading to a diffusion of its norms across the world" (Bradford, 2020, p. 81).

This perspective, Bradford adds, has attracted criticism regarding a possible "regulatory imperialism", which could represent a new form of colonialism under the guise of a "benevolent hegemon". Concerns include issues of sovereignty and the imposition of European preferences (Bradford, 2020, p. 249).

In the specific case under analysis, based on the research by Bueno and Canaan (2024), it is evident that the DSA exerts a symbolic and normative influence on the Brazilian draft law. However, this influence is limited in some respects by its structural constraints. In tracing this incorporation, key actors interviewed note that the primary reference to the DSA in *Bill No. 2630* originated from contributions made by the federal government in 2023, which were later incorporated by the bill's rapporteur, Congressman Orlando Silva. Additionally, the European Union's diplomacy played a relevant role by fostering regulatory exchange with Brazilian authorities (Bueno & Canaan, 2024, p. 9).

It is also noted that, on a symbolic level, the DSA is mobilized as a reference that legitimizes the regulatory proposal in Brazil, even though, in practice, this influence is limited to discursive aspects. In this sense, the authors also question the use of this legitimizing instrument, which naturalizes Europe as a reference: "The paper re-engages with the debate surrounding the cultural hierarchy identified by Quijano (2002), opening a room for discussion on how the pervasiveness of the European worldview represents a form of postcolonial legacy influencing policy construction in the Global South" (Bueno & Canaan, 2024, p. 9).

Regarding the specific aspect related to journalism, it is noteworthy that legislative influence also comes from other non-European countries, such as Australia and Canada, which are still considered part of the Global North.

REGULATORY IMPORTATION IN THE GLOBAL SOUTH: PATH, SHORTCUT, OR DEAD END?

By naming the influence of the European Union's regulatory capacity beyond the continent's borders as the Brussels Effect, Ana Bradford highlights the EU's transnational ability to regulate the global market. In the case under discussion – the attempts to regulate platforms in Brazil – norms and regulations from the EU are introduced by specific private actors: pro-regulation civil society organizations, academic sectors dedicated to studying the democratization of communication, and left-wing and center-left parliamentarians. The most significant influence was observed in the formulation of various bills for discussion and legislative proceedings, particularly in the substitute text of *Bill No. 2630*. As highlighted in Section 5, this bill presents multiple similarities with the European Union's *Digital Services Act* (DSA).

According to Bradford, for the importation of legislation to effectively establish hegemonic regulatory power, five conditions must be met: (1) market size, (2) regulatory capacity, (3) stringent standards, (4) inelastic targets, and (5) non-divisibility.

In the attempt to regulate platforms in Brazil, only condition (4) is met. The presence of inelastic targets is evident in the difficulty of jurisdictional shifts aimed at evading regulations. The judicial suspension of X/Twitter by Brazil's Supreme Federal Court (STF) for 38 days in 2024 serves as the most striking example of this condition. The platform was only allowed to resume operations after complying with a court order to remove posts and paying fines, invoking "national sovereignty", as stated by STF Minister Alexandre de Moraes (Marques & Rezende, 2024).

The remaining conditions are not met. Regarding market size (1), Bradford herself argues that although the European Union's influence remains hegemonic, it has already surpassed its peak. It is also important to note that, despite their transnational nature, the Big Tech companies targeted by regulation are headquartered in countries – primarily the United States and China – where regulatory pressures remain relatively lenient.

The influence of more permissive legislation in these robust economies also undermines the principle of non-divisibility (5), which requires multinational corporations to standardize their compliance with the strictest regulations across all markets in which they operate.

The return of Donald Trump to power and Big Tech's alignment with his administration, alongside a push for platform deregulation even beyond US borders, suggests movement in the opposite direction. On February 26, 2025, the Office of Western Hemisphere Affairs, an agency within the US Department of State, cited Brazil in a statement criticizing the blocking of American social media platforms by foreign authorities, arguing that such actions were "incompatible with freedom of expression". The statement referred to the suspension of the Rumble platform in Brazil, a network backed by Trump Media. The department's note stated:

Rumble is an American company operating under US law. The idea that a foreign judge can dictate which content an American platform must remove and who can receive payments within the United States represents a direct attack to US digital sovereignty. This kind of judicial overreach is precisely why Rumble and Trump Media have filed a lawsuit [against Supreme Federal Court Justice Alexandre de Moraes] in US federal court. (BBC News Brasil, 2025)

In the Brazilian case, conditions (2) and (3) are also barely met. The historical overview presented in Sections 1 and 2 suggests that regulatory capacity has been robust only during dictatorial periods, primarily in the form of censorship, while the tendency toward stringent standards has either mainly been absent or lacked the necessary legal and enforcement mechanisms to ensure their effective implementation.

The immediate political context is also unfavorable for the adoption of EU-style regulation. Studies on the ideological composition of the Brazilian Congress suggest that only around 20% of legislators have a progressive profile, who, in theory, would be more aligned with discussions on the democratization of communication. However, given more pressing contemporary issues such as the climate crisis, inflation, and ideological polarization, this topic remains secondary. The coexistence of a center-left executive branch with a conservative right-wing and far-right legislature, which, as demonstrated, is aligned with Big Tech, has led to a legislative deadlock in advancing platform regulation proposals inspired by the EU's *Digital Services Act*.

In the absence of regulation, Brazil's short-term trend is for the judiciary to continue playing a central role in its relationship with platforms. According to the already cited Internet Civil Framework, content can only be removed following a court order, meaning that judicial discretion takes precedence over any regulatory framework. However, while this approach may lead to changes in platform liability, it does not advance discussions on other critical issues, such as transparency, nor does it propose alternatives for ensuring the sustainability of journalism in digital spaces.

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BRISELSKI UČINAK NA REGULACIJU DIGITALNIH PLATFORMA: ANALIZA BRAZILSKOGA REGULATORNOG PROCESA I NJEGOV UTJECAJ NA NOVINARSTVO

Lizete Barbosa da Nóbrega :: Rodrigo Pelegrini Ratier

SAŽETAK Ovaj članak uspoređuje regulative digitalnih platformi Europske unije s najnaprednijim zakonodavnim prijedlogom Brazila, Zakonom 2630/2020, koji odražava utjecaj europskog okvira, osobito Zakona o digitalnim uslugama (engl. Digital Services Act, DSA). Analizirajući dokumentaciju, članak prati povijest regulacije komunikacija u Brazilu te ističe izazove u tome području. Usporedbom brazilskog prijedloga sa Zakonom o digitalnim uslugama uočavaju se i sličnosti, osobito u pogledu transparentnosti platformi i funkcioniranja algoritama, kao i razlike, poput uključivanja naknade za novinarski sadržaj. Članak također analizira tzv. „briseljski učinak“, proučavajući kako se taj koncept primjenjuje u brazilskom kontekstu.

KLJUČNE RIJEČI

REGULACIJA, PLATFORME, BRAZIL, BRISELSKI UČINAK, NOVINARSTVO

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THE EVOLUTION OF MEDIA OWNERSHIP REGULATION IN CROATIA

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ABSTRACT *This paper aims to describe the evolution of media ownership regulation in Croatia with the aim of assessing whether these developments have supported the promotion of media pluralism. This research is underpinned by the premise that transparency in media ownership – one of the key prerequisites for media pluralism (Borges & Christophorou, 2024), remains insufficiently achieved. The paper shows that Croatia has come a long way from a quite restrictive approach in regulating media ownership, both in terms of openness of the media market and media ownership transparency, to the situation as it stands today. However, certain gaps in the media ownership regulation still exist, particularly in relation to the enforcement mechanisms and the allocation of clear institutional responsibilities for monitoring and sanctioning non-compliance.*

KEYWORDS

MEDIA PLURALISM, MEDIA OWNERSHIP, REGULATION, TRANSPARENCY

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INTRODUCTION

Media ownership, its transparency and diversity do not cease to intrigue both media scholars and policymakers. The most recent effort to advance media ownership transparency and further regulate media market concentration at the European Union level was the adoption of the European Media Freedom Act (EMFA) in March 2024. While it was welcomed as “a groundbreaking step for Europe” in protecting and improving the media sector, some scholars (Schnyder et al., 2024) still find the EMFA insufficient especially regarding media ownership transparency obligations.

As for Croatia, the evolution of media regulation in general and media ownership in particular has undergone significant changes over the last 30-plus years. With the declaration of independence in 1991, Croatia began the process of political and economic transition from socialism and planned economy to parliamentary democracy and market economy. The process of privatization started, and media companies were not exempted from it. At the beginning of the new millennium, policies to attract foreign investments were gradually developed, opening the path for the expansion of transnational media corporations in Croatia. This was followed by the increasing role of the Internet and, consequently, the rise of the new media as well as the EU accession process and efforts to align national media regulation with European standards. The evolution of media ownership regulatory framework continues to this day, further increasing liberalization and being strongly influenced by new technologies, including artificial intelligence.

This paper aims to describe the evolution of media ownership regulation in Croatia with the aim of assessing whether these developments have supported the promotion of media pluralism. This research is underpinned by the premise that transparency in media ownership – one of the key prerequisites for media pluralism (Borges & Christophorou, 2024) – remains insufficiently achieved. It is enshrined in norms, but in practice it is often exposed to manipulation due to inefficient mechanisms that should control the implementation of these norms. Thus, my research questions are as follows: To what extent has media ownership regulation evolved over time in Croatia, and have these changes contributed to media pluralism? To what extent have the legal provisions concerning media ownership been effectively implemented in practice? Is media ownership transparency in Croatia fully achieved, or do gaps remain in the regulatory framework and its enforcement? The research will be conducted through a thorough analysis of media laws, complemented by an examination of relevant reports, such as annual reports of competent bodies. This research, however, is limited in that it does not include the regulatory framework governing privatization, which has certainly played an important role in shaping media ownership in Croatia after its independence; the breadth and complexity of this area exceed the boundaries of this paper. Future research could address this dimension to offer a more holistic view of the media ownership regulatory evolution.

This paper is structured into four main parts. The first section presents a literature review that outlines the theoretical framework related to media pluralism, supplemented

by key observations on media ownership. The second section offers a comprehensive overview of the evolution of media ownership regulation in Croatia, tracing developments from the 1990s onward. The third section examines the effectiveness of existing media ownership provisions and their implementation in practice. Finally, the paper concludes with a summary of key findings.

LITERATURE REVIEW

Normative theories of democracy presume a well-informed citizen capable of making political decisions in various forms of civic engagement. The infrastructure for acquiring necessary information is a public sphere, largely based on media. Given that the media constitute a key institutional structure of the public sphere, it is essential for democracy that there is equality in the distribution of control over the media, which is primarily manifested through ownership (Baker, 2007, p. 7).

Media ownership has long been recognized as a central issue of the independent and critical role of media in public life (Freedman 2014). Since the establishment of commercial radio and television broadcasting during the eighties and nineties, the issue of media ownership, its transparency and concentration has become one of the biggest concerns for media scholars and policy makers. The assumption is that the insufficient dispersion of media ownership affects the diversity of opinions and ideas in the public sphere; and consequently democracy (Bagdikian, 2000; Freedman, 2014).

On media pluralism

The public sphere, through the creation of public opinion, affects the outcomes of political participation of citizens (Habermas, 1962). In that sense, pluralism of opinions, equality in access and opportunity for the articulation of ideas in the public sphere, that is, the media, are one of the basic standards for measuring how democratic the country is. Thus, media pluralism is often seen as a fundamental to democratic development. However, ideas on what media pluralism ought to mean, or how it should be implemented, differ widely and are directly related to how democracy is interpreted. The liberal democratic model understands media as commercialized entities anchored to the free market; the deliberative democratic model implies facilitative role of media acting as “public forums” where public consensus is constructed; while the agonistic democratic model considers media as a political space that should transparently manifest existing differences in a society (Raeijmaekers & Maesele, 2015, pp. 1043-46). Each approach consequently looks at the concept of media pluralism through different lenses. In their discussion on democratic theories and corresponding media roles, Raeijmaekers and Maesele (2015, p. 1047) came to an understanding that there is a “clear distinction between democratic theories which aim at overcoming and neutralizing social heterogeneity and disputes to arrive at public consensus (liberal and deliberative models) and those that aim at recognizing social heterogeneity and disputes as constitutive of democratic politics (agonistic model)”. The distinction between consensus and conflict underlies the contrast between affirmative and critical media theories, as well as different

approaches to media pluralism. Raeijmaekers and Maesele (2015, p. 1051) differentiate four approaches to media pluralism: affirmative diversity, affirmative pluralism, critical diversity, and critical pluralism. While affirmative diversity is concerned solely with a balanced media representation; affirmative pluralism complements it with concerns about quality, focusing not only on the diversity of identities but also on the ways different identities are discursively portrayed (Raeijmaekers & Maesele, 2015, pp. 1051-53). On the other hand, critical diversity is primarily concerned with the commercial interests and structural characteristics of media organizations – including ownership – and how these determine the level of diversity within media coverage (Raeijmaekers & Maesele, 2015, p. 1054). Finally, critical pluralism is interested in “whether the issue is framed as an ideological debate involving key political choices between genuine alternatives, or to the contrary, as a (predefined consensual) matter about which debate is counterproductive” (Raeijmaekers & Maesele, 2015, pp. 1054-55).

Policy attitudes towards media pluralism largely depend on the context within which a media system resides. In democracies, we can distinguish two approaches: the marketplace model and the public sphere approach (Karppinen, 2007, pp. 14-15). They depend on very different political rationalities in interpreting media pluralism as a media policy goal. The marketplace model rests on the liberal freedom of choice perspective and “the free marketplace of ideas” where the limits and criteria are set by free competition and consumer choice. The public sphere approach, on the other hand, advocates plurality as a part of rational democratic public deliberation, relying on the cultural-political norms of diversity, civic equality and universalism. “While the former is based on competition and freedom of choice, the latter emphasizes broader defense of ‘principled pluralism’, an attempt to serve the whole society with various political views and cultural values” (Karppinen, 2007, p. 15). In the comparative model, these two approaches coexist in the European cultural and political space. A particular challenge – reflected in pluralism and media diversity related studies – is this conceptual tension. While the definition of market and discourse diversity is rather easy to quantify and measure; the necessary qualitative measurements and multilayered measurements of public service broadcasting are demanding and difficult to implement. The role of public service broadcasting is especially intangible and above all normative. It is embedded in the ideals of public sphere, citizenship, pluralism, creativity, and other values that are difficult to determine or uniquely define, let alone empirically measure.

Another challenge that scholars encounter when placing media pluralism within the framework of political and social theory is differentiating between the concepts of pluralism and diversity. In political and analytical discourse, the concepts of “media pluralism” and “media diversity” are used interchangeably. This often leads to confusion in distinguishing them and in establishing a possible hierarchy between these two concepts. Karppinen (2007, pp. 9-10) draws a distinction by linking the concept of media diversity to an empirical situation, while pluralism is linked to a diffuse societal value or an underlying orientation. Even though there is a danger of oversimplifying the conceptual differences between the two, it would be fair to say that pluralism is regulated in a standardized manner, i.e., normatively; while diversity is only evident in output values, or measures

of media realities (existence or non-existence, numbers and indicators), emerging as a result of the established norms. In that sense, the concept of media pluralism implies diversity of media, free access, diversity of content and ideas, content quality (content of public interest), variety of news sources, independent editorial practices, transparency and variety of media ownership, and cultural and social diversity in media programming and ideas represented in the media (Klimkiewicz, 2010, p. 268). The concept of media diversity, on the other hand, broadly refers to the heterogeneity of content, publications, ownership or any other aspect of media considered relevant to research. A definition of media diversity was provided by Hoffmann-Riem (1987, as cited in McQuail, 1992, pp. 144) who distinguished four dimensions of diversity. The first one is diversity of formats and issues, meaning that all formats (entertainment, information, education and culture) need to be taken into account. Diversity of formats should be complemented by a diversity of content, i.e., programs should provide factual coverage of different opinions. In addition, programs should provide for the interests of all parts of the community, i.e., personal and group diversity must be present and should include local, regional, national and supranational content.

Challenges in determining the concepts of media pluralism and media diversity consequently transmit to measuring the level of media pluralism and diversity – determining the best and the worst result in some societies, as well as their comparison. While most authors agree that the concept of pluralism is primarily a normative concept; sub-concepts or sub-categories important for understanding pluralism cannot be fully evaluated solely by norms or normative analysis. For example, the literature is critical of the normative approach to the analysis of public interest, an important sub-category of the concept of media pluralism, applied by McQuail (1992) in his book *Media performance*. A number of authors think McQuail's thesis "we can expect that the clearest expression of public interest will be in the laws, regulations, court decisions and commissions reports" can easily be disputed by those who are familiar with the modern legislative process (Pritchard, 1993). On the other hand, when it comes to analyzing or measuring media diversity, it is mainly proposed to analyze different components of this concept, such as sources, content and exposure to diversity, as well as analysis of their interrelationship. Again, this aspect of the approach to research is not without challenges. Although a pluralism advocate, Mouffe (2000, as cited in Karppinen, 2007, p. 12) expressed reservations about extreme pluralism that values all diversity, assessing it as deeply problematic and recognizing the need to limit it at some point. In addition, with media market increasingly being structured into smaller segments, there is a genuine fear that polarization of media consumption may lead to unwanted social fragmentation of the public (Karppinen, 2007, pp. 15-16). Public sphere is above all a domain in which multiple perspectives should openly engage, and it should not rely on unrestricted choices and satisfaction of individual preferences. "Citizens should be exposed to materials and information that they would not have chosen in advance" (Sunstein, 2002, p. 285 as cited in Karppinen, 2007, p. 16) because their choice is always pre-structured by the conditions of competition including structural effects such as concentration of ownership, advertising and political influences (Karppinen, 2007, pp. 15-17).

For the purposes of this paper, the concept of media pluralism is observed solely within normative framework, i.e., fundamental principles and norms; while media diversity will signify multiplicity, i.e., number and diversity of media. This paper, however, has a limited reach in measurement, which as a consequence has a limited reach in understanding the impact of norms governing ownership issues, plurality, and diversity of media.

On media ownership

Liberal media theorists argue that it is possible to maintain a clear division between who owns a media outlet and who controls its editorial content; owners are said to have (only) two kinds of control over their media: allocation control and operational control (McQuail & Deuze, 2020, p. 500). While allocation control includes controlling the company's finances and resources, forming the policy and strategy of the company, and controlling mergers, acquisitions, or cutbacks; operational control includes the internal distribution of resources, setting editorial strategies, and hiring leaders and managers (McManus, 1994 as cited in Sjøvaag & Ohlsson, 2019, p. 8). Professional decisions about content should be left free to producers and editors to take, and there should be intermediary institutional arrangements such as editorial statutes in place to safeguard the editorial integrity and freedom of journalists (McQuail & Deuze, 2020, p. 500). However, everyday reality is somewhat different: commercial media have to make profit to survive, and this often involves taking decisions that directly influence content; publicly owned media, on the other hand, cannot escape the same market logic especially when under pressure by government and ruling political parties (McQuail & Deuze, 2020, p. 500). The solution to such problems lies in multiplicity of media ownership and free competition. This is the best defence against misuse of powers of ownership (McQuail, 2020 & Deuze, p. 502).

Diversity of ownership is one of the main normative expectations relating to the structure of media in the Western type of democracies (McQuail & Deuze, 2020, p. 418). The opposite of media ownership diversity – high concentration of media ownership is often seen as one of the main threats to media pluralism. Peruško (2003, pp. 41-42) draws a distinction between two types – horizontal and vertical media concentration. Horizontal concentration refers to “control over the media of the same type, which are mutually competitive”, while vertical media concentration implies control over “the entire process of media production and distribution, as well as control over the media of the same type in different geographical levels”. The prerequisite for supervision, or rather the prevention of media concentration, is transparent media ownership.

In general, transparency of media ownership protects media pluralism because, without knowing who owns the media and produces content, one can never be sure of pluralistic media landscape (Borges & Christophorou, 2024, p. 69). For authorities, transparency in media ownership allows them to apply rules against media concentration – set limits and impose constraints to reduce the level of influence that media owner(s) could exert on public opinion. From the citizens' point of view, their right to content diversity and access to a variety of information sources should be complemented with their right to know who owns and can influence the content they consume (Borges &

Christophorou, 2024, p. 69). The major challenges in achieving transparency of media ownership refer to identifying the real beneficiaries; first, it is often difficult to determine if there are more natural persons or companies behind a capital shareholder. Second, when there is a lengthy chain of companies involved in the capital share of a media entity, it is very hard – and almost impossible – to determine the influence of each company on the media in question (Borges & Christophorou, 2024, p. 69).

ANALYSIS

Over the past decade, a substantial body of literature has examined different dimensions of media ownership regulation in Croatia (Bilić & Petričušić, 2024; Car & Bilić, 2023; Tušek, 2024; Vozab, Peruško, & Čuvalo, 2017). Among these contributions, one of the most significant is the analysis conducted within the framework of the Media Pluralism Monitor – a tool funded by the European Union and coordinated by the Centre for Media Pluralism and Media Freedom at the European University Institute. The most recent report for Croatia identifies several challenges in the field of media ownership regulation (Bilić & Petričušić, 2024, pp. 8-9). In relation to media ownership transparency, it notes that while basic media ownership information is publicly available, the ultimate beneficial owners of many media providers – particularly politically extreme news portals – frequently remain concealed behind opaque business structures. In addition, the report highlights the gap in media market concentration regulation – it predominantly relies on capital shares and print circulation and neglects socio-cultural indicators such as audience share, which would offer a more comprehensive understanding of the relationship between economic concentration and societal influence. Finally, the report describes regulatory monitoring as largely passive and insufficiently responsive to the evolving dynamics of the contemporary media landscape.

In the following paragraphs, this paper provides a comprehensive analysis of media ownership transparency and media market concentration provisions within key media laws in Croatia – the *Media Act* and the *Electronic Media Act*, with particular attention to their evolution over time.

Regulation of print media ownership

The first Act on Public Information (Official Gazette no. 22/1992) in the independent and sovereign Republic of Croatia was passed in March 1992. Under this Act, every citizen was entitled to publish newspapers. The Act prescribed the obligation of publishers to publish in their outlet(s) the names of people who own ten or more percent of the company's capital with information on the percentage of shares in ownership. This information was to be published at the beginning of each calendar year. On the other hand, the Act on Public Information prescribed that the newspapers can be published by legal and natural persons (Article 3), but only legal persons can produce and broadcast radio and television programs (Article 66). Although this provision itself seems contrary to the Constitution because the constitutional right to establish means of public information was significantly narrowed (Jergović, 2003, pp. 97-98), the Constitutional Court abolished

the Act on Public Information in 1995 for procedural reasons, that is, the Act was not passed by an (absolute) majority of votes of all representatives (Decision of the Constitutional Court of the Republic of Croatia, 1995).

With the adoption of the new Act on Public Communication (Official Gazette no. 83/1996) the permission for publishing of the newspapers as well as production and broadcasting of radio and television programs was somewhat restricted in line with the provision stipulated in *Electronic Media Act* (Official Gazette no. 53/94) stating that one legal or natural person can have up to 25% of the share in the capital of the radio and television concessionaire (or the publisher). In addition, the foreign capital could participate up to 25% in the concessionaire's or the publisher's capital. In terms of media ownership transparency regulation, instead of publishing the information about people who own ten or more percent of the company's capital in their outlets, publishers now must provide this information to the state body that performs administrative tasks in the field of public communication. The amendments to the *Act on Public Communication* (Official Gazette no. 96/2001) have specified the deadline for delivery of this information to the state body (by January 31 each year) and have introduced the obligation for publishers to provide information about their ownership structure already upon reporting publishing of the press to the state body.

In 2003, a new *Media Act* (Official Gazette no. 163/2003) was adopted. It brought significant changes to regulating media ownership transparency as well as to protecting market competition and limiting its concentration. For the first time, the impermissible concentration of publishers was defined. According to Article 33, the impermissible concentration of publishers exists if the market share of one publisher exceeds 40% of all the sold copies of general information daily newspapers or weekly magazines. In addition, the act has emphasized the fact that general regulations on the protection of competition apply to publishers, legal persons engaged in media distribution, and other legal persons performing tasks related to public informing in the same way as they apply to any other legal person registered in a country. To further enhance transparency of media ownership, the *Media Act* introduced a rule that stocks and shares of the publisher's capital must be made out to a name, i.e., they have to be registered. This means that the shareholder's name is clearly indicated, and the transfer of such shares is made more difficult (unlike in the case of bearer shares that cannot be traced back to the owner and are not registered anywhere) (FIMA, 2024, SUMUP, 2024). In addition, already existing obligation of providing the information about people who own ten or more percent of the publisher's capital was expanded. The *Media Act* now prescribed the obligation of publishers to inform the competent state ministry, by January 31 of each calendar year about all legal and natural persons who have direct or indirect ownership of stocks or shares in the publisher's capital with the information on the percentage of stocks or shares. The provision about the shares of foreign persons was introduced as well. It clearly stipulated that all provisions on the limitation of ownership also apply to foreign legal and natural persons. In addition, three months after the adoption of the *Media Act*, in July 2003 the new *Electronic Media Act* was adopted and the restrictions on the maximum share of foreign ownership in the concessionaire's (or the publisher's capital) were lifted as well. Finally, the *Media*

Act from 2003 established a novelty that would later turn out to have an impact on the media market in general and on its structure in particular. It is the obligation of the state to promote pluralism and diversity of the media by promoting among other things the establishment of new print media, especially local and non-profit media, as well as media of nongovernmental organizations.

By the following year, a new *Media Act* (Official Gazette no. 59/2004) was adopted. The article stipulating the permission for publishing of the newspapers as well as production and broadcasting of radio and television programs was deleted. The Croatian Chamber of Economy is now the competent body for collecting information about publishers including their ownership structure. In addition to providing the Croatian Chamber of Economy information about all legal and natural persons who have direct or indirect ownership of stocks or shares in the publisher's capital with the information on the percentage of stocks or shares, the publishers now must provide information on whether those persons hold the shares or are members of the management or supervisory boards in other companies to which the *Media Act* also applies. The aforementioned information needs to be published in the Official Gazette by the February 28 of each calendar year. Provisions on the protection of market competition remained unchanged; the impermissible concentration is still defined as a situation when the market share of one publisher exceeds 40% of all the sold copies of general information daily newspapers or weekly magazines.

The *Act on Amendments to the Media Act* (Official Gazette no. 84/2011) was adopted in 2011 and the amendments were related exclusively to the provisions on media ownership transparency. First, publishers are now obliged to forward to the Croatian Chamber of Economy, by January 31 of each calendar year, the verified copies of the deeds of acquisition for the stocks or shares acquired in a publisher over the preceding year. Second, the provision forbidding the concealment of the publisher's ownership structure or the acquirer's ownership of the stocks or shares in the publisher was introduced. The legal acts concealing the ownership structure of the publisher or the acquirer's ownership of the stocks or shares in the publisher shall be null and void.

Regulation of electronic media ownership

In Croatia, the electronic media were at first regulated by the *Electronic Communications Act* (Official Gazette no. 53/1994). Article 55 prescribed the ownership relations as follows: the radio and television concessionaire is a legal entity in which one member, a legal or natural person, may have a maximum of 25% of shares and one natural person may not participate in the concessionaire's capital with more than 25%. Participation of foreign capital in the concessionaire's capital was as well limited to a maximum of 25%.

The Electronic Communications Act (Official Gazette no. 76/1999) from 1999 loosened the limits on shares in the concessionaire's capital but prescribed in more detail rules regarding family members among members of the concessionaire. Article 77 prescribed that the radio and television concessionaire is a legal entity in which one member, a legal or natural person, may have a maximum of 1/3 of shares and one natural person may not

participate in the concessionaire's capital with more than 1/3 of shares. Participation of foreign capital in the concessionaire's capital was as well limited to a maximum of 1/3 of the concessionaire's capital. If among the members of the company there are family members, then they all together may have a maximum of 1/3 of the concessionaire's capital. It was as well prescribed that one legal or natural person may have a share in the capital of only one concessionaire at the state or regional level or one radio concessionaire and one television concessionaire at the local level but in different non-adjacent concession areas.

With the adoption of the *Electronic Media Act* (Official Gazette no. 122/2003) in 2003, the limitations on the maximum share of foreign ownership in the radio and television concessionaire's capital were lifted. Article 55 stipulated that the provisions on ownership and concentration apply the same to foreign entities as they do on domestic legal entities and natural persons. The obligation to inform a competent ministry, by 31 January of each calendar year, about all legal and natural persons who have direct or indirect ownership of stocks or shares in the publisher's capital and on the percentage of stocks or shares, was taken over from the *Media Act* (Official Gazette no. 163/2003) and introduced for all radio and television publishers. The *Electronic Media Act* from 2003 for the first time defined the impermissible concentration of radio and television publishers. Article 46 stipulates that the impermissible concentration in the media sector exists if:

- >the electronic media publisher who has concession at the state level and a share exceeding 25% of the capital of another electronic media publisher who has the same kind of concession or a concession on the regional, county, city, or municipality level;
- >the electronic media publisher who has concession at the state level and a share exceeding 10% of the capital of publisher who publishes daily newspapers printed in more than 3,000 copies;
- >the electronic media publisher who has concession at the state level and a share exceeding 10% of the capital of a legal person who performs the activity of a newspaper agency;
- >the electronic media publisher who has concession at the state level and simultaneously publishes daily newspapers printed in more than 3,000 copies;
- >the electronic media publisher with a concession at the local or regional level of coverage and shares exceeding 30% of the capital of another such broadcaster with
- >the concession at the local or regional level of coverage in the same area; and if
- >the electronic media publisher who has a concession at the regional or local level of coverage and simultaneously publishes daily newspapers of local importance in the same or in the neighbouring area.

Finally, a new provision on vertical integration was introduced. Article 53 stipulated that an operator who performs the activity of audio-visual or radio program transmission cannot be the television or radio broadcaster.

The *Electronic Media Act* (Official Gazette no. 153/2009) from 2009 did not bring significant changes in media ownership transparency and concentration regulation. Media providers that use satellite, internet, and cable transmission of broadcasting were

included in the definition of impermissible concentration. It exists if they simultaneously publish daily newspapers printed in more than 3,000 copies and if they have a share exceeding 10% of the capital of a publisher who publishes daily newspapers printed in more than 3,000 copies. Another provision introduced with the adoption of the *Electronic Media Act* in 2009 was the prohibition of participation in a procedure for a concession grant for legal person, whose founders include foreign legal persons registered in countries where it is not possible to determine the origin of the founding capital.

The *Act on Amendments to the Electronic Media Act* (Official Gazette no. 84/2011) was adopted in 2011 and the amendments were related exclusively to the provisions on media ownership transparency. First, radio and television publishers are now obliged to forward to the Electronic Media Council, by January 31 of each calendar year, the verified copies of the deeds of acquisition for the stocks or shares acquired in a radio and television publisher over the preceding year. Second, the provision forbidding the concealment of the radio and television publisher's ownership structure or the acquirer's ownership of the stocks or shares in the publisher is introduced. The legal acts concealing the ownership structure of the radio and television publisher or the acquirer's ownership of the stocks or shares in the publisher shall be null and void.

One of the most important changes brought about by the *Electronic Media Act* (Official Gazette no. 111/2021) in 2021 was lifting the ban on the vertical integration. It is now allowed for the operator who performs the activity of audio-visual or radio program transmission to be the television or radio broadcaster. On the other hand, the provisions regarding media ownership transparency were enhanced. Electronic media service providers are now obliged, within five days, to provide the Agency for Electronic Media with information about legal and natural persons who became direct or indirect owners of stocks or shares of the media service provider including the information on the percentage of stocks or shares. They are also now obliged to notify the Croatian Competition Agency about any intention to implement a concentration between undertakings.

Efficiency in implementation of media ownership regulation

For the purposes of this paper, the analysis of the implementation of legal provisions concerning media ownership covers the period from 2004 onwards, as it was in 2004 that these competences were assigned to the Croatian Chamber of Economy (for print media) and to the Agency for Electronic Media (for electronic media).

With the adoption of the *Media Act* (Official Gazette no. 59/2004), the Croatian Chamber of Economy was designated as the competent body responsible for the implementation of legal provisions concerning the ownership of print media. However, this only includes the maintenance of public register and the collection of data on print media ownership. Although the *Media Act* includes misdemeanour provisions applicable to violations of ownership-related regulations, it fails to specify the competent authority responsible for initiating misdemeanour proceedings. Thus, it seems that the role of the Croatian Chamber of Economy in promoting media ownership transparency and preventing undue concentration is limited and largely administrative in nature.

The lack of clarity regarding the initiation of misdemeanour proceedings was also present in the *Electronic Media Act* until 2009, when the Act (Official Gazette no. 153/2009) was amended to explicitly designate the Agency for Electronic Media as the competent authority for issuing warnings in cases of non-compliance and for initiating misdemeanour proceedings in accordance with the misdemeanour provisions specified in the *Electronic Media Act*. According to data from the annual reports of the Agency for Electronic Media, in the first year of implementation of this provision (2010), the Agency issued 54 warnings and initiated 10 misdemeanour proceedings against electronic media providers due to non-compliance with the obligation to submit information on media ownership. In the following two years (2011 and 2012), the Agency issued 27 warnings. No misdemeanour proceedings were initiated in the period from 2011 until 2013, when one misdemeanour proceeding was initiated. Since 2014 publishers have been fulfilling their obligation to submit ownership information following any changes in ownership structure (AEM, 2015–2024). As a result, no warnings have been issued, nor have any misdemeanour proceedings been initiated during this period. Furthermore, since 2019, the Agency for Electronic Media has been involved in providing expert assessments within proceedings initiated before the Croatian Competition Agency, regarding the evaluation of the permissibility of concentrations among media undertakings.

Both the Croatian Chamber of Economy and the Agency for Electronic Media maintain and regularly publish updated registers of media outlets on their respective websites, which include information on media ownership. In addition, the Agency for Electronic Media publishes in its annual reports detailed records of changes in the ownership structure of individual media outlets during the reporting year. This practice enables systematic monitoring of ownership trends and facilitates longitudinal analysis of how media ownership structures have evolved over time.

In April 2025, the Agency for Electronic Media launched a Media Ownership and Financing Platform, representing a significant step forward in the accessibility of media ownership information in Croatia. The platform was developed within the framework of the European Union's Recovery and Resilience Facility with the aim to promote greater transparency in media ownership and provide public access to financial data on media (Council of Europe, n.d.). It provides a centralized and user-friendly digital infrastructure through which the variety of information on electronic media operating in Croatia is easily accessible including the information about the identities of legal and natural persons registered as owners (Agency for Electronic Media, 2025).

CONCLUSION

The analysis of media ownership regulations from the nineties onward shows that Croatia has come a long way from a quite restrictive approach in terms of who can or cannot be a media owner, the extent of acceptable participation of foreign capital in the media market and neglecting the importance of media ownership transparency to the situation where it is today. It is evident that the beginning of the 2000s marks the turning

point on this path. Adopted in 2003 both, the *Media Act* and *Electronic Media Act* brought significant changes in regulating media ownership transparency as well as in protecting media market competition and limiting its concentration. Limitations on the maximum share of foreign ownership in media were lifted. For the first time, the impermissible concentration of newspaper publishers and electronic media providers was defined, and a provision prohibiting vertical integration was introduced. Transparency of media ownership was enhanced: instead of providing competent state bodies the information about people who own ten or more percent of the newspaper publisher's or electronic media provider's capital, the obligation to provide information about all legal and natural persons who have direct or indirect ownership of stocks or shares in the capital was introduced. Second significant step forward in regulating media ownership was made in 2011 with the amendments to both the *Media Act* and the *Electronic Media Act*. The amendments were related exclusively to the provisions on media ownership transparency: the obligation to forward to the Croatian Chamber of Economy and Agency for Electronic Media the verified copies of the deeds of acquisition for the stocks or shares acquired in media service provider over the preceding year was introduced as well as the provision forbidding the concealment of the media ownership structure. The year 2021 was another important year in terms of regulating media market concentration, as it was the year when a new *Electronic Media Act* was adopted and one of the most important changes it introduced was lifting the ban on the vertical integration.

The analysis of the implementation of media ownership regulation revealed certain limitations, particularly in the domain of print media. In the absence of an adequate authority to effectively oversee compliance with the relevant ownership provisions, the Croatian Chamber of Economy assumes a predominantly administrative role, with limited competences in ensuring transparency of media ownership within the print sector. This leads to the conclusion that certain gaps in the media ownership regulation still exist, particularly in relation to the enforcement mechanisms and the allocation of clear institutional responsibilities for monitoring and sanctioning non-compliance.

Despite these challenges, recent institutional initiatives indicate meaningful progress. The Media ownership and financing platform represents a significant step toward enhancing transparency and accessibility of media ownership in Croatia.

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RAZVOJ REGULACIJE MEDIJSKOG VLASNIŠTVA U HRVATSKOJ

Ana Tešić

SAŽETAK Cilj je ovog rada opisati razvoj regulacije medijskog vlasništva u Hrvatskoj od njezina osamostaljenja naovamo te pokušati procijeniti jesu li promjene bile u smjeru podrške medijskog pluralizma. Premisa od koje istraživanje polazi jest da transparentnost vlasništva nad medijima, jedan od ključnih preduvjeta medijskog pluralizam (Borges i Christophorou, 2024), još uvijek nije u potpunosti ostvarena. Rad je pokazao da je Hrvatska prešla dug put od prilično restriktivnog pristupa u regulaciji vlasništva nad medijima, kako u pogledu otvorenosti medijskog tržišta tako i u pogledu transparentnosti vlasništva nad medijima, do situacije u kojoj je danas. No čini se da određeni nedostaci još uvijek postoje, posebice kod osiguranja učinkovite provedbe i dodjeljivanja jasnih institucionalnih odgovornosti za praćenje i sankcioniranje nepoštivanja zakonskih odredbi.

KLJUČNE RIJEČI

MEDIJSKI PLURALIZAM, MEDIJSKO VLASNIŠTVO, REGULACIJA, TRANSPARENTNOST

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PART 2 / GENERAL SECTION

MEDIJSKOM PISMENOSTI PROTIV IDEOLOŠKE PRISTRANOSTI – NEOČEKIVANI NALAZI EKSPERIMENTA

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SAŽETAK *Mediji bi idealno trebali informirati javnost kroz raznolike izvore. No problem predstavljaju tendencije u informiranju građana; primjerice, građani se redovito ponašaju kao motivirani rezonatori, odnosno kroz informiranje žele potvrditi svoje stavove. Drugim riječima, često su ideološki pristrani prilikom evaluacije medijskog sadržaja. Jedan od načina na koji bi se tome moglo doskočiti jest putem programa medijske pismenosti, koji za cilj imaju ojačati vještine građana za analiziranje medijskih informacija, čime se ujedno osvještavaju vlastite pristranosti. No manje se zna o tome djeluju li zaista ti programi. Stoga je cilj ovog istraživanja bio provjeriti efekt gledanja videa o medijskoj pismenosti na ideološku pristranost u procjeni medijskog teksta. Za te je potrebe proveden eksperiment u kojem su sudionici bili podijeljeni u skupine s obzirom na to jesu li bili izloženi sadržaju medijske pismenosti ili nisu te jesu li čitali medijski tekst o stranim radnicima u Hrvatskoj koji je bio pozitivnog ili negativnog tona. Na temelju tih varijabli, kao i na temelju početnog stava sudionika prema stranim radnicima u Hrvatskoj, predviđali smo razinu ideološke pristranosti u procjeni pristranosti i objektivnosti medijskog teksta. U istraživanju je sudjelovalo 216 sudionika, a rezultati su neočekivano pokazali kako izlaganje videu o medijskoj pismenosti ili nema efekt na ideološku pristranost ili je pak povećava.*

KLJUČNE RIJEČI

IDEOLOŠKA PRISTRANOST, MEDIJSKA PISMENOST, EKSPERIMENT,
PROCJENA PRISTRANOSTI, PROCJENA OBJEKTIVNOSTI

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UVOD

Razvojem interneta i društvenih mreža mediji su prisutniji u životima ljudi više nego ikada. Također, građanima je dostupno više medijskih izvora nego ikada u povijesti. S obzirom na to da je velika mogućnost izbora, postavlja se sljedeće pitanje: koje navike selekcije i konzumiranja građani imaju? Odabir medijskog sadržaja često je vođen motiviranim rezoniranjem, odnosno željom građana da potvrde svoje postojeće stavove, a ne da dođu do ispravnih i točnih informacija. Taj fenomen dodatno je izražen u suvremenom medijskom okruženju koje nudi širok spektar sadržaja podijeljenog prema ideološkim preferencijama, olakšavajući građanima da biraju ono što im odgovara. Postoji niz ideja kako reducirati pristranost u odabiru, a jedna je i da pomoću programa medijske pismenosti građani osvijeste način na koji suvremeni mediji funkcioniraju, ali i umanje svoje pristranosti u odnosu prema medijskim sadržajima. No nedostaje dovoljno istraživanja o efektima programa medijske pismenosti, što je posebno naglašeno u hrvatskom kontekstu. Stoga u ovom radu predstavljamo eksperimentalno istraživanje kojem je cilj bio provjeriti efekt medijske pismenosti na ideološku pristranost u procjeni medijskog teksta. U prvom dijelu članka osvrćemo se na ulogu medija u demokraciji, a zatim, u drugom dijelu članka, obrađujemo odnos medijskog okruženja i političkog mišljenja. U trećem dijelu obrađujemo koncept medijske pismenosti i prikazujemo istraživanja utjecaja programa medijske pismenosti na građane. U četvrtom dijelu prikazujemo stanje s medijima u Hrvatskoj, nakon čega slijede prikaz metodoloških detalja eksperimenta, nalazi istraživanja i konačno diskusija.

DEMOKRACIJA I MEDIJI

Demokracija kao poredak pretpostavlja važnu ulogu medija, pa samim time i aktivno uključivanje građana u javnu debatu u kojoj oni izražavaju svoja gledišta i predstavljaju kolektivne interese, a mediji u demokraciji trebaju omogućiti sve oblike participacija pojedinca i grupa (Kunac i Roller, 2015). Gurevitch i Blumler (1990) ističu osam uloga medija u demokraciji, a sve kako bi suživot građana i vlasti bio što kvalitetniji, kako bi građani bili aktivni sudionici društva, posebno onda kada su u pitanju važne odluke za razvoj društva. Navedena očekivanja od medija temelje se na pretpostavci da je idealna demokracija jednaka participativnoj demokraciji, gdje politički dobro informirani građani igraju aktivnu ulogu u vlasti (Graber, 2003). Međutim, Graber (2003) postavlja sljedeće pitanje: je li uopće participativna demokracija izvediva u doba kada je moderna masovna javnost prevelika da bi se uključila u političke rasprave u kojima građani imaju razumnu priliku da se čuju? Je li moderni tržišno orijentirani medijski sustav uopće takav da zadovoljava navedene uloge medija u demokraciji, odnosno da stvara aktivne građane koji uče o društvenom i političkom životu, koji razumiju društveni i politički život i koji sudjeluju u društvenom i političkom životu?

Curran i suradnici (2009) ističu kako mediji u sve više dijelova svijeta postaju tržišno orijentirani i fokusirani na zabavu. Autori, između ostalog, analiziraju „američki tržišni mo-

del", odnosno ispituju utječu li mediji, koji su postali tržišno orijentirani, na informiranost građana o javnim poslovima. Istraživanje je provedeno u četiri zemlje: u Finskoj, Danskoj, Velikoj Britaniji i SAD-u. Autori su kombinirali kvalitativnu analizu sadržaja i anketu o informiranosti i javnoj svijesti o temama koje su aktualne u državi i svijetu. Analizirali su vodeće televizijske programe u četirima zemljama te njihove informativne emisije, odnosno termin emitiranja informativnih emisija i pokrivenost različitih sadržaja. Rezultati istraživanja pokazali su da vodeći televizijski programi u Danskoj, Finskoj i Velikoj Britaniji emitiraju informativne emisije tijekom cijele večeri, dok je u SAD-u, večernji udarni termin (engl. *prime time*) uglavnom posvećen zabavnim sadržajima koji donose profit. Valja napomenuti kako su u tri europske zemlje u analizu uključeni javni medijski servisi, dok je u SAD-u javni televizijski servis, s vrlo niskim postotkom gledanosti, potpuno zanemaren. Autori smatraju kako će takav američki trend sve više zaživjeti u ostatku svijeta, odnosno medijski će sustavi imati sve manje ozbiljnog i informativnog novinarstva, a samim time i smanjenu razinu općeg znanja kod građana. Dio autora pak smatra kako građani ne moraju biti potpuno informirani, već trebaju pratiti političku scenu s dovoljno pažnje da otkriju velike prijetnje (detaljnije u Beattie, 2019). Iako je, ističe Beattie (2019), vrlo čest slučaj da „građani nadzirači“ često ostaju neupućeni u politička pitanja pa i dalje pri glasanju na izborima često koriste mentalne prečace, odnosno heuristike.

MEDIJSKO OKRUŽJE I POLITIČKO MIŠLJENJE

Medijsko okružje izuzetno je važno u stvaranju informacijskog prostora i društva u kojem živimo; ono oblikuje proces razmišljanja i donošenja odluka za mnoge teme u društvu. Postoje dva načelna načina odlučivanja i biranja – sustav 1 i 2 (Kahneman, 2011). Sustav 1 označava brzo, automatski, nesvjesno donošenje odluka bez napora, dok sustav 2 podrazumijeva namjernu kontrolu, svjesnost i kognitivne resurse. U sustav 1 idu i mentalni prečaci, odnosno heuristike. Heuristike su „efikasni kognitivni procesi koji ignoriraju dio informacija“ (Gigerenzer i Brighton, 2009). Osim heuristika, dodatni izazov racionalnosti jest i tendencija da motivirano rezoniramo, odnosno skloni smo usklađivanju procjena informacija s nekim ciljem, no taj cilj često ne uključuje točnost (Kunda, 1990). Odnosno, kako objašnjava Kahan (2013), pojedinci tumače dokaze na načine koji potvrđuju njihova postojeća uvjerenja. U digitalnome medijskom okružju, koje karakterizira preopterećenost informacijama, ponuda vijesti, barem se tako čini, odgovara formatima koji imaju veće šanse za odabir. Jedan od načina privlačenja publike jest pružanje vijesti koje odjekuju ideologijom ili stavovima ljudi (van der Meer i Hameleers, 2021). Ideološka pristranost u vijestima jedno je od najčešće raspravljanih, ali i najmanje razumljivih fenomena za promatrače suvremene političke znanosti, tvrdi Turner (2007). Turner je proveo eksperiment kojim je istraživao percepciju ideološke pristranosti u vijestima koje emitiraju CNN i Fox News Channel. Autor smatra da pridavanje etiketa poput „CNN“ i „FNC“ vijestima šalje ideološki signal gledatelju, što može dovesti do toga da gledatelj percipira ideološku pristranost i podigne kognitivne barijere koje sprječavaju pravilno usvajanje i obradu informacija, odnosno kako Turner (2007) tvrdi – glasnik nadjačava poruku. Sve dok gledatelji mogu percipirati ideološku pristranost – što i čine – optužbe o ideološkoj pristranosti imaju potencijal proizvesti stvarne posljedice za američko javno mnijenje, navodi Turner

(2007). Dakle kognitivni prečaci i predrasude navode ljude da traže informacije koje su u skladu s njihovim ideologijama, što pak učvršćuje njihova stajališta.

Vraga i suradnici (2009) navode istraživanje čiji su autori Charles G. Lord, Lee Ross i Mark R. Lepper (1979) kao jedno od prvih istraživanja načina na koji unaprijed stvoreni stavovi mogu utjecati na obradu sadržaja. Između ostalog, navedeno istraživanje promatralo je fenomen neprijateljskog medijskog efekta među ljudima različitih političkih stavova ili ideologija, pogotovo onda kada se raspravljalo o političkim temama. Vraga i suradnici (2009) navode i istraživanje Alberta C. Gunthera (1992) koje je pokazalo da demokrati smatraju da je izvještavanje o republikancima previše pristrano, i u novinama i u televizijskim vijestima, dok republikanci smatraju da je izvještavanje i u novinama i na televiziji, naravno, povoljno za demokrate. Općenito, konzervativci smatraju masovne medije liberalno pristranima. Vraga i suradnici (2009) ističu da je zapravo politička ideologija, kada se govori o političkim temama, važan identifikator grupe i da dosta utječe na percepciju samog medijskog teksta. Lanac *ideologija – grupa – mediji* bitan je zato što se ljudi često grupiraju prema ideološkim pitanjima, pa samim time biraju medije u skladu sa stavovima. Dakle ljudi pristrano tumače tekstove, odnosno u skladu sa svojom ideologijom, što nije poželjno u participativnoj demokraciji, gdje su građani jedni od donositelja odluka važnih za društvo i njihovu budućnost, a mediji bi, s druge strane, trebali biti potpora toj istoj participativnoj demokraciji; međutim, građani smatraju da su mediji pristrani ili pak biraju medije na osnovi toga što potvrđuju one stavove koje oni sami imaju. Stoga se nameće sljedeće pitanje: možemo li na to djelovati, odnosno kako tome doskočiti? Pretpostavlja se da ipak možemo, a jedno od rješenja jest intervencija medijske pismenosti.

MEDIJSKA PISMENOST

Moderna društva, kako je već spomenuto, prešla su iz ere jezične pismenosti u eru informacijske i medijske pismenosti, gdje nije dovoljno samo čitati tiskani tekst, već je potrebno i kritički interpretirati slike u multimedijskoj kulturi te se izraziti kroz različite medijske forme (Mikulić, 2008). Razni autori razvili su različite konceptualizacije medijske pismenosti, ali se nije uspio postići široki konsenzus o definiciji medijske pismenosti. Općenito, medijska pismenost usredotočena je na specifično znanje i vještine koje mogu pomoći kritičkom razumijevanju i korištenju medija (Hobbs, 1998; Martens, 2010; McCannon, 2014). Razvilo se razumijevanje kako masovni mediji funkcioniraju i kako ljudi prihvaćaju medijske sadržaje (Thoman, 1990), pa je tako i definicija pismenosti evoluirala od relativno jednostavnog značenja sposobnosti čitanja i pisanja do sposobnosti za dublje razumijevanje – do taksonomski višeg stupnja sposobnosti, kritičkog stava pojačanog individualnom kreativnošću (Žuran i Ivanišin, 2013). Možemo pretpostaviti da će osnovna definicija medijske pismenosti u budućnosti također biti nedovoljna, previše nespecifična i neadekvatna (Žuran i Ivanišin, 2013). No ipak postoji ideja kako bi intervencije medijske pismenosti trebale smanjiti pristranost, pa su tako neka istraživanja pokazala da medijska pismenost poboljšava percepciju nepristranog sadržaja podsjećajući pojedince na ulogu medija u pokrivanju različitih stajališta i upozoravajući građane da budu svjesni vlastitih pristranosti (Vraga i sur., 2012). Međutim, bilo je i istraživanja koja to nisu potvrdila, poput

onoga „Media Literacy Interventions: What Makes Them Boom or Boomerang?“ autorice Sahare Byrne (2009) u kojem intervencija medijske pismenosti nije imala utjecaj na djecu četvrtih i petih razreda, na kojoj je istraživanje i provedeno. Djeca koja su slušala predavanje o medijskoj pismenosti bila su sklonija korištenju agresije jer su se usredotočila na nasilne primjere, dok je nedostatak dodatne kognitivne aktivnosti onemogućio obradu i učenje ključnih koncepata. Dakle intervencija medijske pismenosti sama po sebi ne mora nužno dati pozitivan rezultat, iako taj primjer treba uzeti s rezervom s obzirom na to da se radi o djeci osnovnoškolske dobi.

Vraga i suradnici (2009) proveli su anketno istraživanje na 105 studenata s jednog američkog sveučilišta. Prije same ankete dio ispitanika bio je izložen kratkoj prezentaciji o medijskoj pismenosti, koja je naglašavala proces formiranja vijesti, kako publika tumači vijesti i važnost da se u medijima prezentiraju različite ideje. Rezultati su pokazali da je među liberalnim ispitanicima eksperimentalna prezentacija medijske pismenosti značajno smanjila njihovu percepciju pristranosti u vijestima, dok eksperiment nije imao značajniji učinak među konzervativcima. Ono što je važno naglasiti kada je riječ o tom istraživanju jest da autori nisu potvrdili hipotezu da prezentacija medijske pismenosti jednako utječe na sve ispitanike, ali ispitanici su i prije same prezentacije imali različite razine pristranosti i povjerenja u medije na temelju svojih političkih predispozicija. Također je važno reći da je među ispitanicima bilo čak dvostruko više pojedinaca koji se izjašnjavaju kao liberali u odnosu na konzervativce. Nije za zanemariti da konzervativci obično imaju manje povjerenja u medije, a i možda su manje vjerovali eksperimentu koji je proveden u sveučilišnom okružju koje „promiče“ liberalne stavove (Vraga i sur., 2009).

Važnost te studije jest u tome što pokazuje da medijska pismenost ipak može promijeniti percepciju medija, makar kratkoročno. Medijska pismenost uzela je zamah tek u posljednjem desetljeću, navode Vraga i suradnici (2009), prvenstveno u školama, gdje je nastava medijske pismenosti pokušavala učenike educirati o ispravnom čitanju i dekodiranju kontekstualnih poruka u filmovima, glazbi, TV programima, korporativnom oglašavanju i slično, kako bi bolje razumjeli utjecaj medija na vlastite živote i stavove. Navode već neka prijašnja istraživanja o medijskoj pismenosti, gdje su rezultati pokazali da je takva vrsta edukacije imala trajne učinke i dovela je do evaluacije medijskih poruka koja je više analitična. Medijska pismenost trebala bi, dakle, biti implementirana već od najranije dobi u obrazovne ustanove kako bi se stvaralo medijski osviješteno i informirano građanstvo, a ujedno bi to moglo biti jedno od mogućih „rješenja“ polarizacije i neprijateljskog medijskog efekta, lažnih vijesti itd. Također, važno je spomenuti i ono što navode Kellner i Share (2005), a to je da je osnova medijske pismenosti da su sve poruke konstruirane, a kada obrazovanje započne s tim razumijevanjem društvene konstrukcije znanja, proces opismenjavanja može proširiti kritičko istraživanje na višestruke oblike informacija i komunikacije, uključujući televizijske programe, internet, oglašavanje, umjetnu inteligenciju itd. Gore navedeno istraživanje pruža uvid u smanjenje fenomena neprijateljskih medija, a i predstavlja dobar temelj za daljnja istraživanja o utjecaju medijske pismenosti na percepciju medija. Važno je naglasiti da postoje i drukčija istraživanja o medijskoj pismenosti, primjerice studija autorica Vraga i Tully iz 2015. u kojoj je intervencija medijske pismenosti utjecala samo na konzervativce, a ne na liberalne. Taj poseban učinak može biti ukorijenjen

u razlikama u stavovima prema medijima koji razlikuju konzervativce i liberalne; konzervativci koji nisu vidjeli video o medijskoj pismenosti nastojali su demonstrirati apsolutni neprijateljski medijski učinak, što je u skladu s nekim prethodnim istraživanjima (Eveland i sur., 2003), ocjenjujući video kao manje vjerodostojan i „neprijateljskiji” od liberala (Vraga i Tully, 2015). To istraživanje (Vraga i Tully, 2015) pokazalo je da je intervencija medijske pismenosti bila kontraproduktivna. Iako je medijska pismenost uspjela smanjiti apsolutnu razinu neprijateljske percepcije medija kod konzervativaca prema pristranom sadržaju, istovremeno je pogoršala relativnu stopu neprijateljske percepcije kada se uspoređuje sadržaj koji je u skladu s njihovim stavovima s onim koji nije. Žuran i Ivanišin (2013) ističu kako je sama medijska pismenost nepotpuna bez aktivnog korištenja medija, a kada se, uz medijsku pismenost, aktivno koriste mediji, to dovodi do sigurnog i autonomnog odnosa s medijima i, posljedično, do kritičkog odmaka od medijskih konstrukcija. Suvremena medijska pismenost mora uključiti sve dosadašnje pristupe i znanja o medijskoj pismenosti, uz aktivno sudjelovanje i korištenje medija (Žuran i Ivanišin, 2013). S pojavom dostupne i jednostavne tehnologije za medijsku produkciju te sve većom medijskom pismenošću, postoji velik potencijal za pokušaj premošćivanja medijskog jaza.

S obzirom na (relativno) skroman broj istraživanja pristranosti u percepciji medijskog teksta i efekata medijske pismenosti, cilj ovog istraživanja jest provjeriti efekt gledanja videa o medijskoj pismenosti na razinu ideološke pristranosti u percepciji medijskog teksta. Koliko je autorima poznato, takav tip istraživanja nije do sada proveden u Hrvatskoj, a kako bismo ga smjestili u hrvatski kontekst, u idućem se poglavlju kratko osvrćemo na medije u Hrvatskoj.

MEDIJI U HRVATSKOJ

Suvremeni medijski sustav u Hrvatskoj oblikovan je mnogim čimbenicima, posebice turbulentnim povijesnim, političkim i društvenim okvirom, kao što je slučaj i u drugim zemljama istočne i srednje Europe (Grbeša i Volarević, 2021). Peruško (2013) je pomoću teorijskog okvira Hallina i Mancinija (2004) analizirala hrvatski postsocijalistički medijski sustav. Medijski i politički sustav analiziraju se klasterom varijabli, tako da se interpretira razvoj medijskog tržišta, politički paralelizam, novinarski profesionalizam i uloga države (Peruško, 2013). Analiza je pokazala da hrvatski medijski sustav u potpunosti odgovara onome što Hallin i Mancini (2004) nazivaju mediteranski polarizirani pluralistički model medijskog sustava. Politički sustav također odgovara mediteranskom modelu prema karakteristikama koje navode Hallin i Mancini (2004) – snažan politički klijentelizam i slaba provedba racionalnog pravnog autoriteta, tj. vladavine prava, politička kultura koja ne cijeni pridržavanje apstraktnih normi i ne razlikuje lako javni i privatni interes, elite koje više komuniciraju međusobno nego s građanima (Peruško, 2013).

Većina hrvatskih *mainstream* medija, medija glavne struje, privlači publiku različitih političkih orijentacija, na tzv. *catch-all* način (Peruško i sur. 2021). Osim razvitka medijskog sustava, važno je spomenuti i razvoj novog medijskog okružja, koje je promijenilo i samu konzumaciju, tj. način konzumacije medija od strane publika. Pa tako uz klasične medi-

je, odnosno tradicionalne medije, razvijaju se i digitalni mediji i društvene mreže. Grbeša i Volarević (2021) navode kako glavni način informiranja ipak zamjenjuju *online* mediji, umjesto onih tradicionalnih, a u Hrvatskoj je prosjek povjerenja u društvene mreže viši nego u ostatku EU-a.

Promjene u medijskom sustavu u Hrvatskoj nisu popraćene visokim povjerenje u njih (Grbeša Zenzerović i Nenadić, 2022). Istraživanje Eurobarometra pokazalo je da 45 % hrvatskih građana ne vjeruje medijima, a radio je tradicionalni medij kojem se najviše vjeruje, ali tako je i u ostatku EU-a. Vuksan-Čusa i Raos (2021) navode kako su mlađe dobne kohorte sklonije manje vjerovati tradicionalnim medijima. Nepovjerenje u medije prati, ili slijedi, nepovjerenje u institucije, i tu je Hrvatska među onim zemljama koje imaju najniže povjerenje u institucije u EU-u (Henjak, 2017). Prema Eurobarometru, kako navodi Grbeša (2020), samo 15 % ispitanika u Hrvatskoj vjeruje vladi, dok 16 % vjeruje Hrvatskom saboru (vidjeti i Bovan i Baketa, 2022).

Medijsku potrošnju u Hrvatskoj jasno obilježava dominacija elektroničkih medija, posebice televizije, te pad utjecaja tiskanih medija (Popović i sur., 2010). Vozab (2019) navodi pet informativnih repertoara („minimalisti“, „korisnici digitalnih medija“, „tradicionalisti“, „korisnici komercijalnih medija“ i „eklektici“); minimalista je najviše među građanima, i uglavnom su vođeni generacijskom pripadnošću i interesima za političkim vijestima. Ono što je, prema Vozab (2019), zajedničko svim grupama jest korištenje Facebooka i čitanje portala Index.hr; to su izvori koji su konzumirani od različitih publika. Istraživanje Peruško i Vozab (2017) pokazuje da javni medijski servis u Hrvatskoj privlači više desničarske publike, a ne ideološki raznolike.

Digitalizacija je pridonijela devalvaciji standarda u profesionalnom novinarstvu, smatraju Grmuša i Prelog (2020). To pokazuju i istraživanja koja su utvrdila da se Twitter i Facebook nameću kao sve češći izvori vijesti (Grbeša Zenzerović i Nenadić, 2022; Volarević i Bebić, 2013). Beck i suradnici (2021) smatraju kako bi medijska agenda za 2020. – 2030. trebala zastupati politike koje će poticati uvođenje medijske pismenosti, jer manipulacije kontekstom i „mamilice“ često su samo dio nepotpunih informacija. Hrvatska je u proteklih tridesetak godina svakako napravila značajan napredak, no brojne međunarodne organizacije i dalje kontinuirano upozoravaju na politički pritisak na novinare i urednike, političku pristranost javne televizije i prijetnje ekonomskom nesigurnošću koju doživljavaju mnogi novinari (Grbeša i Volarević, 2021).

Informacijski zasićeno okruženje donosi i strategije odabira vijesti od strane publika (Vozab, 2016). Jedna od strategija publike, koju navodi Vozab (2016), jest selektivno biranje izvora informiranja u skladu s vlastitim interesima i svjetonazorom, eliminirajući tako ono što ne potvrđuje vlastite stavove. Selektivno biranje informacija povezano je s psihološkim fenomenom kognitivne disonancije, odnosno neugode suočavanja s informacijama koje nisu u skladu s vlastitim stavovima (Brundidge i Rice, 2008, str. 151, prema Vozab, 2016, str. 5). Istraživanja iz SAD-a (Pew Research Center) pokazuju da u izvorima informiranja demokrata i republikanaca ima jako malo preklapanja (Vozab, 2016). Osim što se sa držaji selektivno koriste, i same publike mogu se podijeliti u dvije skupine: vrlo informirani

i slabo informirani, a tu podjelu omogućuje veliki izbor sadržaja, pa samim time publike koje ne žele biti informirane mogu izbjegavati takve sadržaje (Vozab, 2016). Proširuje se i koncept aktivnih publika – publike kao medijski korisnici aktivne su u selekciji medija i produbljenoj individualnoj i društvenoj interakciji s medijskim tekstovima (Livingstone, 2003, str. 27, prema Vozab, 2016).

U tekstu iznad prikazan je „lanac“ problema koji obuhvaća ulogu medija u demokraciji, tržišno orijentiran medijski sustav, percepciju i konzumaciju medija, medije u Hrvatskoj i medijsku pismenost. Pregledom literature u Hrvatskoj vidljivo je da u Hrvatskoj nema istraživanja koja se izravno bave medijskom pismenosti, odnosno ta istraživanja više upućuju na samu važnost medijske pismenosti, posebice u školama (Ciboci, 2018), a manje govore o efektima medijske pismenosti na korisnike. Također, zastupljeni su tekstovi o samoj implementaciji medijske pismenosti u obrazovni sustav (Kanižaj i Car, 2015). A da bismo mogli implementirati medijsku pismenost kao obveznu stavku u obrazovanju, potrebno je znati i navike djece i mladih u korištenju medija, a posebno interneta, a jedno od malobrojnih takvih istraživanja provedeno je 2016. godine (Ciboci i sur., 2019). Što se tiče istraživanja o samoj konzumaciji medija i medijskim navikama građana u Hrvatskoj, većina je istraživanja deskriptivna, odnosno najčešće nude opis i pregled učestalosti korištenja pojedinih medija; tko, što i koliko koristi (Čuvalo i Peruško, 2017), bez analize percepcije samog medija ili medijskog teksta koji se koristi i utjecaja medijske pismenosti. Stoga će ovo istraživanje pokušati obuhvatiti sve gore navedene koncepte i povezati ih i istražiti kroz eksperimentalni nacrt.

CILJ I METODA ISTRAŽIVANJA

Cilj ovog istraživanja jest provjeriti efekt izlaganja videu o medijskoj pismenosti na ideološku pristranost u procjeni medijskog teksta. Očekuje se kako će izlaganje sadržaju medijske pismenosti smanjiti ideološku pristranost. Kako bismo provjerili tu hipotezu, proveli smo eksperiment u kojem je nezavisna varijabla izlaganje videu o medijskoj pismenosti (polovica sudionika bila je izložena, a polovica nije), dok je zavisna varijabla bila razina ideološke pristranosti u procjeni medijskog teksta. Ideološka pristranost ovisi o početnom stavu sudionika kao i o stavu koji se ističe u medijskom tekstu, i to na način da očekujemo da će sudionici manje pristranim procijeniti tekst koji je bliži njihovu početnom stavu, dok će pristranijim procijeniti tekst koji je udaljeniji od njihova početnog stava. S obzirom na to da početni stav sudionika nije moguće eksperimentalno manipulirati, odlučili smo koristiti dva medijska teksta, jedan s pozitivnim stavom prema temi, a drugi s negativnim. Drugim riječima, postojale su četiri skupine sudionika – skupina koja je gledala video i čitala tekst s pozitivnim stavom, skupina koja je gledala video i čitala tekst s negativnim stavom, skupina koja nije gledala video i čitala je tekst s pozitivnim stavom te skupina koja nije gledala video i čitala je tekst s negativnim stavom. Na taj način anuliramo manjak eksperimentalne kontrole kada je riječ o početnom stavu.¹

¹ Eksperimentalnu kontrolu mogli bismo povećati tako da sve sudionike s pozitivnim stavom podijelimo u dvije podskupine, od kojih bi jedna bila izložena videu o medijskoj pismenosti, a druga ne. Zatim bismo te skupine podijelili u dodatne dvije podskupine, ovisno o stavu medijskog teksta koji bi čitali. Istu bismo stvar trebali napraviti i za sudionike s negativnim stavom. Međutim, s obzirom na to da smo za provođenje ovog istraživanja koristili alat Google Forms, nije bilo moguće koristiti takav eksperimentalni dizajn.

Za temu medijskog teksta odabrana je tema stranih radnika u Hrvatskoj, što je tema koja je poprilično prisutna u hrvatskim medijima i javnom prostoru, a ujedno postoji i širok spektar stavova i pozicija oko nje. Procjena medijskog teksta o stranim radnicima u Hrvatskoj, uz početni stav sudionika prema stranim radnicima, ovisi i o drugim individualnim karakteristikama koje je bilo važno kontrolirati u eksperimentu. Prvo, orijentacija k socijalnoj dominaciji (*social dominance orientation*, SDO; Sidanius i sur., 2016), koja se odnosi na stav prema uspostavljanju i održavanju hijerarhijskih međugrupnih odnosa u društvu, pokazala se u dosadašnjim istraživanjima kao važan korelat stava prema strancima (npr. Craig i Richeson, 2014; Thomsen i sur., 2008; Zhai i sur., 2022; Zhirkov, 2021). Drugo, procjena pristranosti medijskog teksta ovisi i o medijskim navikama sudionika, ponajviše o učestalosti informiranja i o razlozima informiranja, kao i o procjeni kvalitete i nepristranosti medijskog sadržaja kojem su inače izloženi. Naime, možemo očekivati kako će sudionici koji se ne informiraju redovito, koji ne prate vijesti jer ih ne smatraju važnima ili smatraju da je medijski sadržaj nepouzdan, u većoj mjeri bilo koji medijski sadržaj kojem budu izloženi u eksperimentu smatrati pristranim.

Tijek istraživanja

Samo istraživanje teklo je na sljedeći način. Sudionici su putem alata Google Forms pristupili istraživanju. U prvom su koraku ispunili anketni dio istraživanja unutar kojeg su odgovorili na pitanja o svojim karakteristikama. Nakon toga su po slučaju podijeljeni u dvije skupine, od kojih je jedna gledala kratki video² o medijskoj pismenosti, dok ga druga skupina nije gledala. Video je napravljen za potrebe ovog istraživanja, a zbog želje da što više sudionika fokusirano pogleda video te da ne odustanu od istraživanja zbog duljine trajanja videa, video je trajao 1 minutu i 16 sekundi. Temelji se na sadržaju sa stranice Medijskapismenost.hr, a u njemu se definiraju mediji i njihova uloga, lažne vijesti, medijska pismenost, govori se i o tome kako se pristupa i analizira medijski sadržaj te o važnosti da vijest bude nepristrana i objektivna. Nakon toga sudionici su po slučaju podijeljeni u dvije podskupine, od kojih je jedna čitala medijski tekst s pozitivnim stavom o stranim radnicima u Hrvatskoj, a druga s negativnim stavom. Oba su teksta u cjelini (bez fotografija i sličnog sadržaja) preuzeta s dva različita portala u Hrvatskoj.³ Na taj smo način povećali vanjsku valjanost eksperimenta. Pozitivni članak fokusira se na radnike iz Nepala, Indonezije i Filipina te ističe njihovu važnost za spas turističke sezone, kao i visoku kvalitetu njihova rada. Negativni članak iste radnike opisuje kao nepouz dane, sklone davanju otkaza čim dođu u Hrvatsku te problematizira proces izdavanja radnih dozvola. Nakon čitanja medijskog teksta, sudionici su odgovorili na nekoliko pitanja vezanih uz vlastitu percepciju medijskog teksta, bili su upućeni u stvarnu svrhu istraživanja te su naposljetku mogli pristati da se njihovi podatci koriste u istraživanju ili to odbiti; svi su sudionici pristali da se njihovi podatci koriste u istraživanju. Nacrt istraživanja dobio je 9. lipnja 2023. godine od Etičkog povjerenstva Fakulteta političkih znanosti pozitivno mišljenje za provođenje.

² Video je dostupan na sljedećoj poveznici: <https://www.youtube.com/watch?v=UcM8oNTFhFE>

³ Oba teksta dostupna su u *online* Dodatku: https://osf.io/as9q3/files/osfstorage?view_only=d4079d67c187445abf4d5c8cdd130498

Operacionalizacija varijabli

Procjenu medijskog sadržaja mjerili smo dvjema varijablama – stavovima prema objektivnosti („Smatrate li da je ovaj članak objektivno napisan?“; 1 – *Izrazito neobjektivan*, 5 – *Izrazito objektivan*) i pristranosti medijskog teksta („Smatrate li da je članak pristran, odnosno da su u članku vidljivi stavovi autora ili redakcije?“; 1 – *Izrazito nepristran*, 5 – *Izrazito pristran*). Na taj način možemo putem dviju varijabli zahvatiti mjeru ideološke pristranosti, čime povećavamo robusnost nalaza. Kako bismo zamaskirali pravi cilj istraživanja, uz navedene varijable ispitani su još niz karakteristika teksta: prateći istu logiku; riječ je o procjenama primjerenosti duljine i tona teksta, dovoljne razine informacija o temi te jasnoće teksta. Za mjeru orijentacije k socijalnoj dominaciji korištena je skala od 5 čestica na standardnoj Likertovoj ljestvici od pet stupnjeva slaganja, s česticama poput „Pojedine grupe ljudi su jednostavno manje vrijedne od drugih“. Učestalost informiranja putem različitih izvora mjerena je na ljestvici od 1 – *Nikad* do 5 – *Svakodnevno*, s nizom izvora, poput dnevnih novina, televizije, radija, društvenih mreža, obitelji itd. Odnos prema vijestima⁴ mjerio se standardnom Likertovom ljestvicom od 5 stupnjeva slaganja s osam čestica poput „Ne pratim vijesti jer ne vjerujem informacijama koje mediji daju“ i „Ne pratim vijesti jer se previše bave stvarima koje nisu važne“. Procjena medijskog sadržaja koji sudionici koriste mjerena je skalom od 6 čestica, standardnom Likertovom ljestvicom od 5 stupnjeva slaganja, a primjeri su čestica: „Za sadržaj medija koje najčešće koristim smatram da je točan i da iznosi činjenice“ i „Za sadržaj medija koje najčešće koristim smatram da je pouzdan i da mu se može vjerovati“. Uz navedene karakteristike ispitane su i sociodemografske karakteristike sudionika, poput dobi, primanja (samoprocjena u odnosu na prosječna primanja u Hrvatskoj), spola i obrazovanja, ali i sociopolitički stavovi, poput podrške demokraciji (difuzna i specifična potpora, vidjeti Čular i Šalaj, 2019; 2024) te političke participacije (sumativne mjere izborne i netradicionalne participacije (prosvjedi, bojkotiranje proizvoda, referendum, peticija, stranački skup)). Navedene varijable korištene su kao dodatna kontrola eksperimentalnih efekata. Konačno, za mjeru stava prema strancima u Hrvatskoj korištena je čestica „Država treba ograničiti useljavanje stranaca“ s Likertovom ljestvicom slaganja od pet stupnjeva.

Analitički je plan bio sljedeći. U prvom koraku provjerit će se mjerne karakteristike korištenih skala te izračunati prosječne vrijednosti. Nakon toga prikazat će se deskriptivni podatci na razini cjelokupnog uzorka, a zatim provjeriti razlike među eksperimentalnim skupinama u procjenama medijskog teksta, kao i u individualnim karakteristikama, kako bismo mogli vidjeti koje od njih treba dodatno statistički kontrolirati u idućoj fazi. Konačno, za pojedinu procjenu medijskog teksta (objektivnost i pristranost) provjerit će se model u kojem će se, osim početnog stava (i eventualnih kovarijata) te efekata na eksperimentalne skupine (izloženost medijskoj pismenosti i ton članka), dodati i njihove dvosmjerne i trosmjerne interakcije. Za analizu će se koristiti programsko okruženje R (R Core Team, 2024).⁵

⁴ Projekt Istraživački novinarski laboratorij: Vjerodostojnost medija kroz kulturu eksperimenata i inovacije u redakcijama (JOURLAB) Hrvatske zaklade za znanost, IP-2019-04-6331

⁵ Cijeli R kod, (dodatne) tablice, grafove, kao i bazu podataka moguće je pronaći u online Dodatku: https://osf.io/as9q3/files/osfstorage?view_only=d4079d67c187445abf4d5c8cdd130498

REZULTATI

U istraživanju je sudjelovalo 216 sudionika. Uzorak je bio prigodan, a regrutacija sudionika odvijala se preko daljih poznanika te putem društvenih mreža. Sudjelovalo je 57,4 % žena, prosječna starost sudionika je 25,91, a 72,3 % sudionika ima fakultetsko obrazovanje.

Metrijska kvaliteta korištenih skala provjerena je ili konfirmatornom faktorskom analizom (ukoliko je postojala očekivana struktura iz prethodnih istraživanja) ili eksplorativnom faktorskom analizom. Rezultati su pokazali zadovoljavajuće mjerne karakteristike za sve skale; skale orijentacije k socijalnoj dominaciji, odnosa prema vijestima i procjene medijskog sadržaja imale su jednofaktorsku strukturu, dok je skala informiranja imala dvofaktorsku strukturu – informiranje putem tradicionalnih medija (dnevne novine, tjednici i magazini, televizija i radio) te informiranje putem osobnijih izvora (obitelj, prijatelji, društvene mreže). Detalje svih faktorskih struktura moguće je pronaći u *online* Dodatku. Na temelju rezultata faktorskih analiza izračunate su prosječne vrijednosti koje su korištene u daljnjoj analizi.

U Tablici 1 nalaze se prosječne vrijednosti karakteristika sudionika s obzirom na eksperimentalnu skupinu. S obzirom na to da distribucije kontinuiranih varijabli nisu zadovoljavale kriterij normalnosti (testirano Shapiro-Wilkovim W testom), gdje god je bilo moguće korišteni su neparametrijski testovi. Tako se u Tablici 1 nalaze i rezultati Kruskal-Wallisova testa te dobivenih *post-hoc* razlika koje su provjerene Dunnovim testom.

Tablica 1. Individualne karakteristike sudionika s obzirom na eksperimentalnu skupinu

Pozitivni članak	Negativni članak	Pozitivni članak i medijska pismenost	Negativni članak i medijska pismenost	K-W test (p-vrijednost)	Post-hoc razlike
N					
47	65	61	43	/	/
Dob					
28.64	24.52	25.08	26.19	< 0.001	(1) – (2); (1) – (3)
Spol (% Ž)					
66	50.8	57.4	58.1	/	/
Obrazovanje (% fakultetsko)					
78.7	69.2	67.2	79.1	/	/
Primanja					
3.38	3.31	3.36	3.65	0.0586	/
Participacija					
1.23	1.2	1.16	1.19	0.9723	/



Pozitivni članak	Negativni članak	Pozitivni članak i medijska pismenost	Negativni članak i medijska pismenost	K-W test (p-vrijednost)	Post-hoc razlike
Potpora demokraciji (% Da)					
57.4	40	39.3	58.1	/	/
Specifična potpora demokraciji					
2.43	2.32	2.33	2.56	0.5345	/
Orijentacija k socijalnoj dominaciji					
2.04	2.24	2.04	1.88	0.1503	/
Informiranje – tradicionalni izvori					
2.74	2.49	2.72	2.63	0.6313	/
Informiranje – osobno					
3.64	3.25	3.76	3.55	0.0239	(2) – (3)
Odnos prema vijestima					
2.37	2.62	2.49	2.26	0.2029	/
Procjena medijskog sadržaja					
3.23	2.81	3.13	3.37	0.0149	(2) – (4)
Stav prema strancima					
2.7	3	3.3	2.63	0.0318	/

Kao što je vidljivo iz podataka, relevantnih razlika nema i riječ je tek o sporadičnim razlikama među skupinama u dobi, učestalosti informiranja putem osobnih izvora te procjeni medijskog sadržaja. Iako je u najvažnijoj individualnoj varijabli, stavu prema strancima, Kruskal-Wallisov test pokazao da postoje značajne razlike među skupinama, *post-hoc* testovi pokazali su kako nema razlika među eksperimentalnim skupinama u stavu prema strancima. S obzirom na navedeno, nema potrebe za uvođenjem individualnih karakteristika kao kovarijata u narednim analizama.

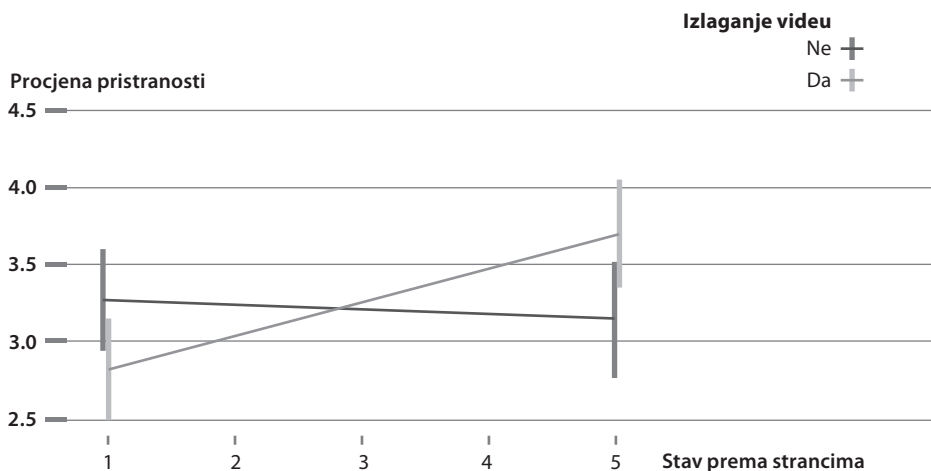
U prvom koraku daljnje analize provjerili smo razlike među skupinama u procjenama pročitano g medijskog teksta. Rezultati su pokazali kako postoje statistički značajne razlike među eksperimentalnim skupinama u procjeni duljine i tona medijskog teksta (Tablica 2). Očekivano, skupine koje su čitale pozitivni članak (neovisno o tome jesu li gledale video ili ne) procijenile su medijski tekst kraćim nego skupine koje su čitale negativni članak (neovisno o tome jesu li gledale video ili ne). Naime, pozitivni članak zaista je bio nešto kraći od negativnog. Obrnute razlike dobivene su za ton članka, i u skladu s očekivanjima medijski su tekst sudionici koji su čitali pozitivni tekst zaista i procijenili pozitivnije od sudionika koji su čitali negativni tekst. Iz perspektive ta dva nalaza možemo reći da je eksperimentalna manipulacija bila uspješna.

Tablica 2. Procjene duljine i tona članka s obzirom na eksperimentalnu skupinu

Pozitivni članak	Negativni članak	Pozitivni članak i medijska pismenost	Negativni članak i medijska pismenost	K-W test (p-vrijednost)	Post-hoc razlike
Duljina članka					
2.47	3.23	2.72	3.33	< 0.001	Sve osim (1) – (3) i (2) – (4)
Ton članka					
3.19	2.4	3.44	2.26	< 0.001	Sve osim (1) – (3) i (2) – (4)
Pristranost					
3.23	3.18	3.20	3.35	0.789	/
Objektivnost					
3.02	3.11	2.89	2.86	0.422	/
Količina informacija					
2.40	2.91	2.52	2.56	0.055	/
Jasnoća					
3.26	3.54	3.36	3.05	0.181	/

S druge strane, nisu dobivene statistički značajne razlike među skupinama u procjenama pristranosti, objektivnosti, količine informacija i jasnoće medijskog teksta. Međutim, kao što je opisano u metodološkom dijelu članka, to ne znači da nismo pokazali efekt medijske pismenosti na ideološku pristranost u procjeni medijskog teksta; za to je potrebno koristiti kompleksnije statističke modele kako bismo u obzir uzeli odnos početnog stava sudionika prema strancima i medijskog sadržaja kojem su bili izloženi. Stoga smo u idućem koraku proveli analizu varijance u kojoj je kriterij bila procjena medijske pristranosti teksta, a prediktori su bili početni stav prema strancima, varijable eksperimentalne skupine (izloženost videu o medijskoj pismenosti i ton članka (pozitivni i negativni)) te njihove dvosmjerne i zajednička trosmjerna interakcija.

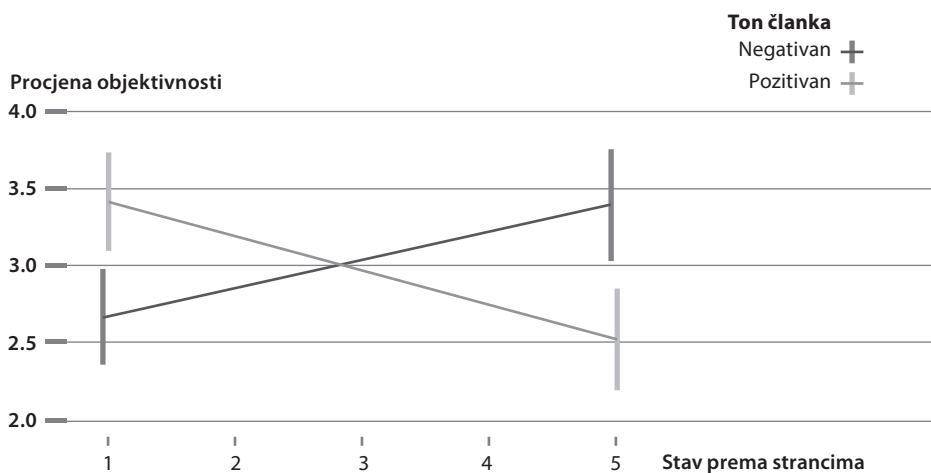
Rezultati su pokazali kako postoji značajan efekt stava ($F = 3.95$; $p = 0.0482$) te kako je statistički značajna interakcija između početnog stava i gledanja videa o medijskoj pismenosti ($F = 7.219$; $p = 0.008$). Za *post-hoc* test koristili smo analizu izračuna marginalnih prosjeka (engl. *estimated marginal means*), ali s fokusom na razlike u koeficijentima (engl. *slope*), odnosno „efektima” početnog stava na procjenu pristranosti medijskog teksta, ovisno o eksperimentalnim skupinama. Za detaljniji uvid u interakcijske efekte valja se okrenuti vizualnom prikazu (npr. McCabe i sur., 2018). Na grafikonu ispod prikazani su procijenjeni odnosi početnog stava prema strancima (veći broj znači veće slaganje s ograničenjem stranaca u Hrvatskoj, odnosno negativniji stav prema strancima) te procjene pristranosti teksta. Vidljivo je kako s rastom negativnog stava raste i procjena pristranosti, neovisno o tonu članka. U isto je vrijeme vidljivo i kako je taj efekt prisutan samo kod skupina sudionika koje su bile izložene videu o medijskoj pismenosti; kod sudionika koji nisu bili izloženi videu efekt stava stabilan je na svim razinama početnog stava prema strancima.



▲ Grafikon 1.

Odnos početnog stava i procjene pristranosti
s obzirom na izloženost videu o medijskoj pismenosti

Ti rezultati pokazuju kako u situaciji u kojoj sudionici nisu izloženi sadržaju medijske pismenosti nije došlo do efekta ideološke pristranosti; upravo suprotno, do tog je efekta došlo kod skupina koje su gledale video o medijskoj pismenosti.



▲ Grafikon 2.

Odnos početnog stava i procjene objektivnosti
s obzirom na ton članka

Istu analizu ponovili smo za procjenu objektivnosti članka. U toj analizi značajnom se pokazala samo interakcija između početnog stava i tona članka ($F = 16.567$; $p < 0.001$). Na Grafikonu 2 vidljiv je odnos početnog stava i procjene objektivnosti medijskog teksta s obzirom na ton članka. Vidljivo je kako u situaciji kada su sudionici čitali negativni članak, oni koji su imali intenzivniji negativni stav procjenjuju tekst objektivnijim, dok obrnuto vrijedi za sudionike koji su čitali pozitivni članak. Drugim riječima, došlo je do jasnog efekta ideološke pristranosti sudionika. U isto vrijeme izostao je efekt gledanja videa o medijskoj pismenosti.

RASPRAVA

Cilj ovog istraživanja bio je provjeriti efekt medijske pismenosti na ideološku pristranost u procjeni medijskog teksta. Za potrebe tog cilja proveli smo eksperimentalno istraživanje u kojem smo varirali izlaganje videu o medijskoj pismenosti i proučavali efekt na procjenu ideološke pristranosti teksta. Za provjeru ideološke pristranosti sudionika bilo je također potrebno manipulirati sadržajem koji je za neke sudionike bio u skladu s njihovom ideološkom pozicijom, a za neke ne. U istraživanju su stoga korištena dva teksta na temu stranih radnika u Hrvatskoj, od kojih je jedan imao pozitivan zaključak, a drugi negativan. Za početak valja istaknuti kako je u tom smislu eksperimentalna manipulacija bila uspješna; sudionici koji su čitali pozitivni članak, neovisno o izlaganju treningu medijske pismenosti, zaista su tekst procjenjivali pozitivnijim (i kraćim, a tekst je zaista i bio kraći) nego sudionici koji su čitali negativni članak. Ključni nalazi bili su neočekivani u odnosu na početne hipoteze. Izlaganje videu o medijskoj pismenosti imalo je negativni efekt na procjenu pristranosti, odnosno sudionici koji su mu bili izloženi smatrali su da je tekst koji su čitali pristraniji što je njihov stav prema strancima bio negativniji. Taj nalaz vrijedi i za sudionike koji su čitali tekst s negativnim i pozitivnim tonom. Drugim riječima, video o medijskoj pismenosti pojačao je ideološku pristranost sudionika. Takav nalaz dodatno je neočekivan kada se uzme u obzir da je kod sudionika koji nisu bili izloženi videu početni stav prema strancima imao istu razinu efekta na procjenu pristranosti neovisno o tome je li taj stav bio negativan ili pozitivan. Kod procjene objektivnosti teksta identificirana je jasna ideološka pristranost sudionika – što je tekst sudionika bio manje u skladu s njihovom početnom ideološkom pozicijom, to su ga sudionici procjenjivali manje objektivnim. Ovdje nije došlo do efekta gledanja videa o medijskoj pismenosti; oni sudionici koji su gledali video u jednakoj su mjeri iskazivali ideološku pristranost kao i oni koji nisu gledali video. Općenito možemo reći kako je u ovom istraživanju medijska pismenost imala ili nulti ili negativan efekt na ideološku pristranost u procjeni medijskog teksta.

Ti nalazi nisu su skladu s većinom istraživanja efekata medijske pismenosti, prema kojima postoji pozitivni efekt medijske pismenosti na stavove, znanje i percepciju o medijima i medijskom sadržaju (pregled u Jeong i sur., 2012). Iako dio istraživanja nije pokazao efekt medijske pismenosti, taj izostanak efekta medijske pismenosti bio je vezan uz određenu podskupinu (npr. Vraga i sur., 2009; Vraga i Tully, 2015). Negativni efekt medijske pismenosti, koliko je poznato autorima, pronađen je samo u jednom istraživanju koje je provedeno na uzorku učenika nižih razreda osnovne škole i u kontekstu mjera agresivno-

sti (Byrne, 2009). Stoga se valja detaljnije osvrnuti na karakteristike ovog istraživanja kako bismo pokušali objasniti neočekivane rezultate.

Iz perspektive procjene pristranosti, neočekivani rezultat zapravo je takav da su sudionici koji nisu bili izloženi videu o medijskoj pismenosti adekvatno procjenjivali pristranost onoga što su pročitali – neovisno o svojem početnom stavu prema strancima tekst su procijenili jednako pristranim. To je upravo ono što bismo očekivali da će izlaganje videu o medijskoj pismenosti napraviti. Ključno je pitanje stoga ovo: zašto su sudionici koji su bili izloženi videu o medijskoj pismenosti procjenjivali pročitani članak pristranijim što su imali negativniji stav prema strancima (i to neovisno o tonu članka koji su čitali)? Jedan od razloga može biti da su ti sudionici ujedno oni koji su *a priori* imali negativni stav prema medijima i koji su smatrali da su mediji općenito pristrani u izvještavanju. I zaista, na razini korelacije, što su sudionici imali negativniji stav prema strancima, to su u većoj mjeri izjavljivali da ne prate vijesti jer ne vjeruju informacijama koje mediji daju ($r = 0.39$; $p < 0.001$). U tom slučaju video o medijskoj pismenosti dodatno ih je, i paradoksalno, ojačao u negativnom stavu prema medijima i medijskom sadržaju.

Međutim, u tom bismo slučaju očekivali da će procjena objektivnosti pratiti iste tendencije kao i procjena pristranosti, pogotovo kada imamo na umu da postoji negativna korelacija između procjena objektivnosti i pristranosti ($r = -0.40$; $p < 0.001$). No do toga nije došlo, i u tom slučaju sudionici koji su imali negativniji stav prema strancima procjenjivali su negativni tekst objektivnijim, a pozitivniji tekst manje objektivnim. Ako prihvatimo logiku da sudionici koji imaju negativniji stav prema strancima ne vjeruju informacijama koje mediji daju, onda je za pretpostaviti da za sudionike termini pristranosti i objektivnosti nisu čiste suprotnosti; štoviše, da aktiviraju kvalitativno drukčije kriterije procjene medijskog teksta. Moguće je da je pristranost, kao inherentno negativni termin, ponukala sudionike koji ionako ne vjeruju informacijama koje mediji daju da češće (refleksno) negativno procijene medijski tekst, neovisno o samom sadržaju; dok je objektivnost možda neutralniji ili pozitivniji termin kod kojeg su se onda sudionici u većoj mjeri fokusirali na sadržaj, a ne toliko na samu činjenicu da čitaju medijski tekst.

Ovo istraživanje nije mjerilo medijske efekte, tj. kako medijski sadržaj utječe na stav o nekoj temi. Fokus je bio na ideološkoj pristranosti u procjeni pristranosti kao mentalnom „alatu“ koji građani onda mogu koristiti kako bi odbacili ili prihvatili neki medijski sadržaj te time posredno umanjili ili pojačali efekt sadržaja na svoj stav o temi. Ideološka pristranost, u sve više polariziranom medijskom okružju, predstavlja veliki izazov idealu javne sfere i slobodno informirane javnosti. Upravo zbog toga u ovom nas je istraživanju zanimalo možemo li medijskom pismenošću barem donekle anulirati efekte ideološke pristranosti. Zbog toga smo koristili eksperimentalni nacrt u okviru kojeg smo jasno izolirali uzročno-posljedični efekt gledanja videa o medijskoj pismenosti. Rezultati su pokazali ne samo da gledanje videa o medijskoj pismenosti nema efekt na ideološku pristranost sudionika, već da može, kod ideološki obojanih političkih tema, imati i kontraefekt.

Valja imati na umu niz ograničenja ovog istraživanja. Kao prvo, u istraživanju je korišten relativno mali i donekle specifičan uzorak u kojem su sudionici u odnosu na opću

populaciju Hrvatske puno mlađi i obrazovaniji. Potrebno je u budućim istraživanjima proširiti uzorak na starije i manje obrazovane građane. Drugo, stav prema stranim radnicima mjerili smo jednim pitanjem, dok bi u budućim istraživanjima kompleksnije mjere mogle ponuditi nijansiraniiji uvid kako sudionici doživljavaju strane radnike u Hrvatskoj. Treće, odabrali smo set korelata koji smo htjeli kontrolirati, što se u budućim istraživanjima može proširiti s, primjerice, mjerama autoritarnosti ili doživljaja ekonomske i kulturne ugroženosti od stranaca. Četvrto, u želji da osiguramo što veću vanjsku valjanost kada je riječ o medijskom sadržaju kojem su sudionici bili izloženi, odabrali smo stvarne medijske tekstove o stranim radnicima u Hrvatskoj. To je pak za posljedicu imalo da su sami tekstovi bili različite duljine te su imali nešto drukčiji fokus u svom sadržaju. S druge strane, kada je riječ o medijskoj pismenosti, bili smo usmjereni na unutarnju, a ne na vanjsku valjanost. Naime, iako čitanje i evaluacija medijskog sadržaja nisu ništa neuobičajeno u svakodnevnici sudionika, ono gdje se istraživanje najviše udaljilo od realnosti jest u gledanju videa o medijskoj pismenosti. Video je trajao manje od dvije minute, dok pravi treninzi medijske pismenosti obično traju duže, imaju više sadržaja, ponekad su interaktivnog karaktera i imaju i voditelja/voditeljicu. Osim toga, kao i kod svakog oblika treninga, očekuje se da su efekti takvog treninga „sporiji“, odnosno da je možda potrebno i više sesija kako bi se neki efekt pokazao, a i taj se efekt možda pokaže tek nakon što od samog treninga prođe više vremena (v. Jeong i sur., 2012). Dodatno, ne možemo biti sigurni da je gledanje videa zaista imalo efekt na povećanje medijske pismenosti sudionika. U skladu s time, buduća bi istraživanja mogla pratiti sudionike kroz duži vremenski period, kombinirajući eksperimentalni i longitudinalni nacrt, kao i izlažući sudionike postojećim i pravim treninzima medijske pismenosti te testirajući njihove razine medijske pismenosti. Osim toga, u budućim istraživanjima moguće je koristiti i niz tema medijskog sadržaja, kao i nekoliko različitih medijskih tekstova s obzirom na njihovu ideološku poziciju. Konačno, s obzirom na zanimljiv nalaz vezan uz procjene pristranosti i objektivnosti medijskog sadržaja, zanimljivo bi bilo provesti kvalitativno istraživanje kojim bi se ispitalo razumijevanje i korištenje tih termina u evaluaciji medija od strane građana.

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MEDIA LITERACY AGAINST IDEOLOGICAL BIAS – UNEXPECTED FINDINGS OF AN EXPERIMENT

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ABSTRACT *Ideally, the media should inform the public through diverse sources. However, issues arise from the tendencies observed in how citizens are informed. For example, people regularly act as motivated reasoners, seeking information that confirms their own beliefs – that is, they are often ideologically biased. One approach to address this issue is through media literacy programs, which aim to strengthen citizens' skills in analyzing media content, thereby increasing awareness of their own biases. However, little is known about whether these programs truly have an impact. Therefore, the goal of this study was to examine the effect of watching a media literacy video on ideological bias in the evaluation of a media text. To this end, an experiment was conducted in which participants were divided into groups based on whether they were exposed to media literacy content or not, and whether they read a media text about foreign workers in Croatia that was either positive or negative in tone. Based on these variables, as well as participants' initial attitudes toward foreign workers in Croatia, we predicted the level of ideological bias in their assessment of the bias and objectivity of the media text. The study involved 216 participants, and the results unexpectedly showed that exposure to the media literacy video either had no effect on ideological bias or actually increased it.*

KEYWORDS

IDEOLOGICAL BIAS, MEDIA LITERACY, EXPERIMENT, BIAS ASSESSMENT, OBJECTIVITY ASSESSMENT

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MEDIA PLURALISM AND GENRE DIVERSITY IN TV SERIES: CHANGES IN CROATIAN TELEVISION CULTURE FROM 2003 TO 2018

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ABSTRACT *In the early 21st century, the Croatian television system changed radically, bringing major shifts in television culture. This study analyses the period from 2003 to 2018, focusing on genre diversity, audience education, and the origin of popular television series. Based on secondary statistical analysis of Nielsen ratings for adult audiences, the study examines the ten most-watched titles per season, with additional insights from a broader Top 20 list. The findings show tectonic shifts in genre distribution, cultural orientation, and the legitimization of popular series. Genre diversity has been replaced by a concentration of telenovelas. Western productions have lost their primacy; Turkish series now dominate, Eastern titles are displacing domestic ones, and popular series have become lowbrow.*

KEYWORDS

TELEVISION SERIES, TELEVISION CULTURE, GENRE, TELEVISION PREFERENCES, CULTURAL CAPITAL

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INTRODUCTION¹

Television audiences differ in cultural tastes, shaped by social background and linked to broader sets of affinities and interests (Bourdieu, 1984). These tastes are formed within specific media systems, through engagement with particular content and genres (McQuail, 2010, p. 430). Media choices become sources of meaning and pleasure (Fiske, 2001, p. 1), influencing the formation of taste, identity, and values (Bignell, 2000). On this basis, *television cultures* (Fiske, 2001) emerge “as patterns of ideas and practices tied to specific forms of mediated communication, which shape processes of meaning formation across instances of production, reception, and use” (Mihelj & Huxtable, 2018, p. 28). In analyses of television cultures, audience tastes and preferences are considered key elements (Mihelj & Huxtable, 2018), and *genre* serves as a cultural indicator (Peruško & Čuvalo, 2014). Genre *popularity* reflects characteristics of the media system (Bilić, 2011) that shape media culture. Understanding these dynamics is crucial to assessing how media systems shape cultural expression and foster social cohesion.

It is therefore relevant to examine whether transformations in the television system correspond to shifts in audience preferences and, more broadly, to developments in media culture. Croatia provides an illustrative case. In the early 21st century, its television system evolved from a (monopolistic) “old television” system to a (pluralistic) “new era” (Roller, 2014). The landscape of *popular television* also changed significantly (Havens et al., 2012). Commercial channels were introduced, and access to foreign pay-TV increased steadily – both technologically and linguistically (Ipsos et al., 2014; Lotz, 2018). Subscription video-on-demand (SVoD) services also emerged (Tryon, 2015). Linear television remains dominant, with 40% of the population watching during prime time (MKM, 2022), yet nearly half of the population is not subscribed to pay-TV (HAKOM, 2022). This positions terrestrial viewers as the most cohesive audience segment (Ipsos et al., 2014). At the same time, TV series have become one of the most widespread and favoured forms of global popular culture, mediating ideologies and social concerns (Esquenazi, 2013). Production and popularity continue to grow (Chalaby, 2023). In Croatia, series have become central in the ratings race (Panjeta, 2014; Premec, 2013). This study thus explores whether and how these structural changes in television have shaped viewing preferences and cultural taste, thereby contributing to the transformation of television culture. The analysis focuses on national terrestrial channels, the most popular and universally accessible media platforms across all social groups. It aims to investigate diachronic trends in the most-watched series genres, with particular focus on genre diversity. Additionally, the study examines popular series genres in relation to two indicators: the educational structure of audiences (cultural legitimacy; Karuza Podgorelec, 2023) and the origin of production (cultural influence; Pušnik & Starc, 2008).

¹ The research presented in this article is part of a broader study conducted for the author's doctoral dissertation, which analysed 22 popular TV series genres in Croatia, focusing on their genre-specific features, audience ratings, and sociodemographic profiles.

FICTIONAL GENRES IN THE STUDY OF TELEVISION CULTURE

In a study of popular culture, Cawelti introduces the concept of “formula” (comparable to genre conventions; Fiske, 2001, p. 109). For Cawelti (1977, p. 7), this concept “is useful primarily as a means of making historical and cultural inferences about the collective fantasies shared by large groups of people and of identifying differences in these fantasies from one culture or period to another.” Closely tied to specific cultural and historical contexts, formulas typically exhibit a limited repertoire of plots, characters, iconography, and settings that reflect the values and tensions of the societies that sustain them (Cawelti, 1977). Similarly, each fictional genre depicts a particular world and set of topics (Creeber, 2015). Fictional genres are dynamic cultural categories that combine three discursive practices: *definition* (main conventions), *interpretation* (meaning and influence), and *evaluation* (cultural value), each constitutive of the genre itself (Mittell, 2004, p. 16).

Media cultures “are decisively shaped by genre structures” (Ritzer, 2021, p. 1). In television, generic conventions “are a prime way of both understanding and constructing” the producer-audience-text relationship (Fiske, 2001, p. 109). Genre functions as a complex “set of expectations” (Leutrat, 1973, as cited in Neale, 1980, p. 51) and as a discursive act with distinct roles in reception, economics, and production (Neale, 1980, pp. 50-52). While fictional television genres reflect cultural attitudes, preoccupations, and values, they are also shaped by market dynamics. Broadcasters and sellers act as “the gatekeepers of national television” and “cultural intermediaries,” mediating between producers and viewers, and between transnational and national cultures (Kuipers, 2012, p. 582). Transformations in the production, distribution, and reception of fictional genres are therefore interrelated variables within the broader shifts in television and popular culture (Lotz, 2018; Lotz & Lobato, 2023; Mittell, 2004; Thompson & Mittell, 2020).

Telenovela

All globally popular drama and comedy genres originated in the West, unlike the soap opera, which includes two distinct genres: the Western soap opera (hereinafter “soap”) and the telenovela, its non-Western counterpart (Artz, 2015; Creeber, 2015; Havens, 2005, p. 271). The soap opera is defined by a slow, serialised structure focused on dialogue, rumour, and the personal sphere, expressed through sentimental melodrama and schematic emotions (Allen, 1985; Geraghty, 1981). Influenced by the American daytime soap, the telenovela emerged in 1950s Latin America and has since undergone multiple local adaptations (Abu-Lughod, 2008; Allen, 1995; Artz, 2015; Panjeta, 2014). While soaps revolve around “a large community of interrelated characters” (Allen, 1995, p. 18), telenovelas typically present a “highly personalised” story “about romance and success” (Artz, 2015, p. 194), often driven by a desire for wealth. Their melodramatic tensions are based on sharp contrasts between the rich and corrupt and the poor and virtuous (Abu-Lughod, 2008, p. 203). In doing so, they construct a culturally specific and predictable repertoire of class-based, moralistic, and ideological polarisations (Martín-Barbero, 1993, pp. 134–137). Unsurprisingly, the genre has been continually adapted to reflect shifting social dynamics and varying cultural and national contexts (Lopez, 1995, p. 261).

It is also important to note certain terminological variations within the telenovela genre. While “telenovela” is often used as a general label, it most commonly refers to the Latin American version. Other variants are typically referred to by country of origin or local terms (Allen, 1995; Artz, 2015). The Turkish variant, for instance, is called both “Turkish telenovela” (Gül, 2021, p. 20; Panjeta, 2014) and “dizi” (Acosta-Alzuru, 2021; Gül, 2021). This hybrid mixes Latin American telenovela, the American prime-time soap, and the Arabic “musalsal”, characterised by strong melodrama (Kraidy & Al-Ghazzi, 2013; Panjeta, 2014). The Turkish telenovela retains melodrama and romantic tropes but incorporates enhanced production values, greater character complexity, and an aesthetic closer to Western sensibilities (Acosta-Alzuru, 2021; Kraidy & Al-Ghazzi, 2013; Panjeta, 2014). Nonetheless, despite increased production investment, all subtypes of the soap opera – including both the Latin American and Turkish telenovela – remain low in cultural value (Acosta-Alzuru, 2021, pp. 2-3; Mittell, 2020, pp. 15-16). In this article, the term “telenovela” is used as a general designation for the genre as a whole, while specific local variants are identified by their country of origin.

TELEVISION SERIES IN CROATIA: A DIACHRONIC OVERVIEW

Monopolistic Television System

Television in Croatia developed over decades while the country was part of Yugoslavia, within a pop-cultural sphere which Vučetić (2018) describes as “Coca-Cola socialism” – a hybrid of Western popular culture and Yugoslav socialist ideology. The media system operated as a monopoly (Peruško & Čuvalo, 2014), and Western series were already highly popular by the 1960s (Vučetić, 2018). Between 1960 and 1990, imports made up 65.3% of all series broadcast, with 83.0% of those originating from the West (Mihelj & Huxtable, 2018, pp. 181-182, 186). Television aimed to entertain a broad audience while upholding cultural value. Daily soaps were neither produced nor acquired (Mihelj & Huxtable, 2018), and American prime-time soaps aired selectively (Vučetić, 2018).² This process of Westernisation intensified over time. Croatia’s television – Televizija Zagreb, part of Yugoslav Radiotelevision – played a key role, keeping pace with Western pop-cultural trends and popularising high-quality American series and films through innovations like the *Programme Plus* marathon (Pokrajac, 2018, pp. 40-42). Editors also supported domestic series aligned with Western aesthetics and cultural value (e.g., Miroščenko, 2013).

Yugoslavia produced more dramas and comedies than expected for its relatively small economy. Domestic TV drama was seen as a major achievement of Yugoslav broadcasting. Still, Western series were perceived as more “memorable” and carried an “aura of superior quality” (Mihelj & Huxtable, 2018, pp. 181-182, 198-199). Television served as a window into a longed-for modernity, offering a Western formula of aesthetics, leisure, freedom, democracy, and prosperity – promoting a polished, Western-style middle class and the value of cultural capital (Pušnik & Starc, 2008, p. 784). Cultural imports often served “as a

² In this article, “prime-time” is defined as the period between approximately 7:00 p.m. and 10:30 p.m. (see MKM, 2022). Prime-time series sometimes extend beyond this slot into adjacent parts of the day. A narrower term than prime-time, the expression “key evening slot” refers to the most-watched period of the evening, following the main evening news, approximately between 8:00 p.m. and 10:00 p.m.

substitute for what was not there in the really existing life of society" (Tomić-Koludrović & Petrić, 2007, p. 18). By the late 1980s, niche channels in the U.S. spurred the development of complex series (Lotz, 2018), which Croatian audiences embraced. The trend continued in post-socialist Croatia. Latin American telenovelas became popular daytime fare, while prime-time featured diverse genres. In the 2003/2004 season, when Nielsen began peoplemeter-based measurement, titles such as *Band of Brothers*, *Spooks*, *CSI: Crime Scene Investigation*, *Sex and the City*, and *Gilmore Girls* were among the top ten most-watched (Nielsen, personal communication, December 7, 2020). This suggests that Croatian audiences remained receptive to and appreciative of Western television aesthetics.

Pluralistic Television System

At the beginning of the 21st century, the liberal pluralist paradigm gained ascendancy in media policy (Peruško, 2013b). The broader sociocultural context in which changes to the television system took place is captured by the concept of a "mixed society" (see Bilić, 2012; Primorac, 2014), developed by Tomić-Koludrović and Petrić (2007). Croatia is culturally diverse, encompassing Central European and Mediterranean identities, as well as a Balkan one associated with areas formerly under Ottoman rule. This complexity is expressed in a locally specific dual model of mentality, symbolising tensions between democratic and patriarchal-authoritarian principles. In terms of values, post-socialist and post-war Croatia is shaped by the co-existence of first ("simple," "industrial") and second ("reflexive," "post-industrial") modernity, which addresses the issues ignored by the first: family roles, individualisation, and cosmopolitanism (see Beck, 1986; Inglehart, 1977). During this period, a process of retraditionalisation emerged, accompanied by tensions between contrasting value-systems. On the one hand, there was a resurgence of traditionalism, cultural closedness, and a renewed proximity to the Balkans (despite its officially negative connotation), which coexisted with state-building and early capitalist values. On the other hand, there was a strong aspiration towards cultural openness and the embrace of "European" – i.e., Western – values associated with second modernity. In this context, mixed personal cultural identities emerged, often internally contradictory and combining diverse relationships between elements of first and second modernity (Tomić-Koludrović & Petrić, 2007). Within this sociocultural landscape, television was increasingly shaped by expectations of commercialisation and market orientation as means to achieve pluralism and diversity (Peruško, 2013b). The first two decades of the 21st century brought four key changes related to television series:

(a) *The loss of public television monopoly.* Nova TV, a commercial generalist channel, was launched in 2000 and achieved its first success by 2003 (Peruško, 2011, p. 64). The generalist channel RTL followed in 2004, while niche channels Doma TV and RTL2 were granted national concessions in 2010 (Peruško, 2011; Roller, 2014). By decade's end, the public broadcaster HRT faced a deepening crisis (Bilić, 2011) and lost its ratings primacy (Peruško, 2011; Roller, 2014).

(b) *The localisation of Pay TV channels.* By the end of the first decade, foreign series on niche Pay TV channels were translated, and audience fragmentation began. Despite diminishing language barriers, these channels gained viewership slowly, and none

achieved notable ratings (Nielsen, 2013, pp. 36-37). This trend persisted (AEM, n.d.). Pay TV penetration rose from 39.1% in 2011 to 50.4% in 2018, and 52% in 2022 (HAKOM, 2011, 2019, 2022).

(c) *Exclusive SVoD series.* Distribution of exclusive foreign (mainly Western) series via SVoD platforms began in 2013 (Tryon, 2015), attracting younger and more educated audiences (Karuza Podgorelec, 2020). These series were rarely localised throughout the 2010s. By 2018, only 18% of adults aged 18-60 watched SVoD (Ipsos, 2019), rising to 42% by 2023 (Ipsos, 2023).

(d) *New evening scheduling design of commercial channels.* Scheduling design is central to programme policy (Prado et al., 2020, p. 1). In 2004/2005, before the evening news, HRT broadcast the first domestic soap opera – the telenovela *Villa Maria* (Vujnović, 2008) – and continued broadcasting telenovelas in that slot until 2010. Commercial broadcasters soon adopted the practice (Zajović, 2014). However, from 2009 onward, they aired telenovelas daily *in key evening slots* after the evening news (see Premec, 2013), and, encouraged by the popularity of Turkish titles, sometimes scheduled two back-to-back (Panjeta, 2014). This model is typical for non-Western markets like Latin America (Creeber, 2015), but rare in the West, where these slots are reserved for mainstream drama and comedy (Jordan, 2007; Prado et al., 2020). Under this model, shorter-form genres like drama and comedy were largely abandoned, as daily rotation proved unsustainable. Domestic comedic telenovelas filled the need for humorous content (Creeber, 2008; Pavlić, 2014). Alongside telenovela premieres on generalist channels, niche channels offered reruns of long-running dramas and sitcoms in the same key evening slot rhythm. As commercial broadcasters overtook HRT in ratings (Peruško, 2011; Roller, 2014), scripted series became increasingly marginalised in HRT's evening schedule.

From 2003 to 2018, these four changes were gradually introduced and became entrenched. In the first five years, the era of public television dominance and scarcity of soaps gradually ended. New commercial channels gained their first ratings successes, while foreign niche channels remained marginal due to language barriers. In the next five years, commercial channels began broadcasting telenovelas daily in key evening slots, while foreign niche Pay TV channels started translating series and attracted a segment of the local audience. Terrestrial niche channels focused on series content also received broadcasting licences. The third five-year period was marked by the consolidation of the telenovela's presence on commercial channels and the growing global production of more complex series designed for VoD platforms, which began attracting Croatian viewers. During this phase, the availability of translated series on foreign Pay TV channels further expanded, consolidating that mode of viewership. This fifteen-year period forms the focus of this study. The hypothesis is structured as follows:

Hypothesis: Between 2003 and 2018, on terrestrial channels with national licences, the genre distribution of popular series shifted such that genre diversity gave way to the telenovela as the dominant genre.

RESEARCH DESIGN

A secondary statistical analysis was conducted on longitudinal television ratings data from 2003 to 2018, provided by Nielsen and based on a representative sample of the Croatian population aged 18 and over (see Peruško, 2011; Roller, 2014). The analysis focused on the average minute rating percentage (AMR%) of prime-time series, defined as the percentage of individuals in the measured sample who were watching a given series. Data were organised into broadcast seasons running from 1 September to 31 August of the following year. The term "title" refers to any series aired during a given season. If a series was rerun or broadcast over multiple seasons, it was treated as a separate title for each season. Only titles with a minimum of four episodes were included. The key indicator of audience ratings was the AMR% per title, which formed the basis for constructing audience rankings (Top lists). For telenovelas, AMR% per episode was also calculated to ensure a more precise measure, given the considerable variation in episode counts per title. Country-of-origin data were obtained from Nielsen. For classification purposes, the study applied Huntington's (2011, pp. 27-30) categorisation, according to which Western countries comprise Western Christian Europe, North America, Australia, and New Zealand. Croatia was treated as a neutral case, and all other countries were categorised as non-Western. In the case of co-productions, the country of the leading producer was recorded. The channels analysed included HTV1, HTV2, Nova TV, Doma TV, RTL, and RTL2.

Statistical analysis was conducted for the following groups: (a) the total adult population sample (Total); (b) sample with primary education or less (PE); (c) sample with secondary education (SE); and (d) sample with higher education (HE).

For each season, the twenty most-watched series titles were ranked within the Total sample (Top 20 Total list), as well as within each educational subgroup (Top 20 PE, Top 20 SE, and Top 20 HE). Each Top 20 list was further divided into two sublists of ten titles: Top 10 and Top 11–20. The Top 10 Total list served as the primary basis for evaluating the hypothesis. In the next stage of analysis, all selected titles were classified by genre in accordance with television genre theory (e.g., Creeber, 2004, 2015; Mittell, 2004). For each title, the following variables were recorded: AMR% in the Total sample, AMR% within each educational group, genre, country of origin, and number of episodes (as an indicator of exposure to the genre).

Drawing on insights into the transformation of the television system, the examined period was divided into three five-year intervals: the Initial Phase (seasons 2003/2004 to 2007/2008), the Transition Phase (2008/2009 to 2012/2013), and the Consolidation Phase (2013/2014 to 2017/2018). These intervals were then compared. The hypothesis was tested by comparing the Top 10 most-watched series during the Initial and Consolidation Phases and by examining two specific claims: (a) that during the Initial Phase, no single genre accounted for more than 40% of the titles, indicating genre diversity; and (b) that during the Consolidation Phase, over 60% of the titles belonged to the telenovela genre, suggesting that the telenovela emerged as the dominant genre.

RESULTS

Top 10 Total

In the Initial Phase, ten genres were represented on the Top 10 Total list. Two soap opera genres accounted for 18% of the titles (soap: 10%, telenovela: 8%). Six drama genres accounted for 48% of the titles (with crime alone making up 30%), while two comedy genres made up 34% (sitcom: 32%). In the Transition Phase, eight genres were represented. Compared to the Initial Phase, the share of soap opera titles rose to 48%, with telenovelas alone rising to 46%. At the same time, the share of drama titles dropped to 16%, and the number of represented drama genres fell to four. The share of comedy titles increased slightly, reaching 36%. In the Consolidation Phase, six genres appeared on the list. Telenovela remained the only represented soap opera genre, accounting for 74% of the titles. The decline in drama genres that began in the Transition Phase continued – dropping to three genres and a 10% share – while comedy fell to 16%.

From the Initial Phase to the Consolidation Phase, the share of Western titles (predominantly dramas) decreased from 56% to 10%, while the share of non-Western titles increased from 2% to 70%. From the Transition Phase to the Consolidation Phase, the share of Turkish titles (exclusively telenovelas) rose from 32% to 58%. Titles from the former Yugoslavia were mostly sitcoms from Bosnia and Herzegovina, whose share increased from 2% in the Initial Phase to 12% in the Consolidation Phase. As non-Western titles gained prominence, the share of Croatian titles fell from 42% in the Initial Phase to 20% in the Consolidation Phase (see Table 1).

Table 1. Top 10 Total: Percentage of Titles (%) by Genre and Country of Origin Across Three Phases

Genres	Initial Phase		Transition Phase		Consolidation Phase	
	Titles (%)	Origin of titles (%)	Titles	Origin of titles (%)	Titles	Origin of titles (%)
Soap opera	18		48		74	
Telenovela	8	HR 8	46	HR 14 TR 32	74	HR 12 TR 58 ES 2 IT 2
Soap	10	IT 8 USA 2	2	IT 2	0	
Drama	48		16		10	
Crime	30	USA 16 UK 4 CA 6 AT 2 DE 2	10	USA 10	4	IT 4
Action-adventure	6	USA 4 UK 2	2	DE 2	2	USA 2



Genres	Initial Phase		Transition Phase		Consolidation Phase	
	Titles (%)	Origin of titles (%)	Titles	Origin of titles (%)	Titles	Origin of titles (%)
War	2	USA 2	0		0	
History	4	HR 4	0		0	
SF	4	USA 4	2	USA 2	0	
Soap drama ³	2	USA 2	2	RS 2	0	
TV musical	0		0		4	HR 4
Comedy	34		36		16	
Sitcom	32	HR 28 SAD 2 BiH 2	30	HR 20 BiH 10	14	HR 2 BiH 12
Milieu comedy-drama ⁴	2	HR 2	4	HR 4	2	HR 2
Romcom	0		2	HR 2	0	

Legend: AT = Austria; BiH = Bosnia and Hercegovina; CA = Canada; DE = Germany; ES = Spain; HR = Croatia; IT = Italy; USA = United States; RS = Serbia; TR = Turkey; UK = United Kingdom.

Soap opera ratings on the Top 10 Total list in the Initial Phase were 18.90% AMR but dropped to 12.85% in the Consolidation Phase. This decline coincided with a significant increase in the number of telenovela episodes on the list – from 685 in the Initial Phase to 2,734 in the Transition Phase and 3,005 in the Consolidation Phase. The rating gap between viewers with primary education or less (PE) and those with higher education (HE) was substantial, as telenovelas have always been considered a lowbrow genre, and it widened over time: from 10.11 percentage points in the Initial Phase, to 11.97 in the Transition Phase, and 15.86 in the Consolidation Phase (based on episode-level AMR%).

Drama AMR% peaked in the Initial Phase at 17.55%, when drama genres were most widely represented. Among secondary (SE) and HE groups, drama consistently outperformed both soap operas and comedies. In the Transition Phase, drama remained the top-rated genre for SE and HE audiences, with 10.65% AMR. In the Consolidation Phase, drama reached 11.34% AMR, though its audience base shifted. Only two crime dramas remained on the Top 10 list – both European hybrids incorporating telenovela conventions and appealing primarily to PE viewers. Middlebrow Western detective series (see Jenner, 2022), previously popular among SE and HE viewers, had virtually disappeared. Similarly, the domestic TV musical adopted telenovela tropes and attracted mainly PE audiences (e.g., *Stella*).

³ "Soap drama" is a relatively recent genre within the drama genre group. It may be understood as drama in the narrower sense, although it can incorporate certain themes from soap operas and comedic codes. It deals with major and meaningful issues through the lens of an individual's personal life (Creeber, 2004).

⁴ "Milieu comedy-drama" is the operational term for a local genre within the comedy genre group. It includes series of higher cultural value, such as *Crno-bijeli svijet*, *Prosjaci i sinovi*, *Velo misto*, *Grlom u jagode*, and others. Through a blend of comedy and drama, these series vividly portray specific mentalities, local environments, and historical periods. They are perceived as authentic, multi-layered depictions of a given local milieu and feature a broad spectrum of archetypal characters emerging from 'our environment'.

Comedy achieved the most balanced ratings across educational groups, but disparities widened over time. Sitcoms increasingly acquired a lowbrow profile. The rating gap between PE and HE viewers grew from 4.62 percentage points in the Initial Phase, to 6.74 in the Transition Phase, and 9.70 in the Consolidation Phase. The Consolidation Phase Top 10 was dominated by a BiH sitcom, and the humour in most Croatian sitcoms likewise appealed most to PE viewers. Only one Western sitcom appeared on the list (*Sex and the City*, Initial Phase), attracting mainly HE viewers (Total: 15.12%; PE: 13.02%; SE: 15.93%; HE: 17.31% AMR). In contrast, the underrepresented milieu comedy-drama – represented solely by *Crno-bijeli svijet* in the Consolidation Phase – was most popular among HE viewers (Total: 12.40%; PE: 8.25%; SE: 12.88%; HE: 17.68% AMR). See Table 2 for detailed AMR% values across all educational subgroups and phases.

Alongside changes in genre distribution, there was also a moderate decline in overall AMR% on the Top 10 Total list – dropping from 15.47% in the Initial Phase to 12.41% in the Consolidation Phase. However, this decline was not uniform across educational groups. AMR% increased among PE viewers (from 16.77% to 19.04%) but declined sharply among HE viewers (from 13.84% to 6.58%) and moderately among SE viewers (from 14.87% to 10.62%).

Over time, the number of episodes per season doubled – from 360 in the Initial Phase, to 675 in the Transition Phase, and 768 in the Consolidation Phase. This growth was primarily driven by the expansion of telenovelas and, in the Consolidation Phase, by the introduction of daily rebroadcasts of the BiH sitcom *Lud, zburjen, normalan* in key evening slots, matching the daily scheduling pattern of telenovelas (148 episodes per season).

Top 11-20 Total

This section analyses the less-watched Top 11–20 list, ranked by AMR%, revealing distinct patterns in genre distribution and audience structure. On this less-watched list, crime series dominate, followed by sitcoms and telenovelas. However, the crime genre – which was more popular among SE and HE viewers – showed a marked decline in share (from 52% in the Initial Phase to 24% in the Consolidation Phase). Sitcoms increased modestly, from 14% in the Initial Phase to 20% in the Consolidation Phase, while telenovelas rose from 14% in the Transition Phase to 22% in the Consolidation Phase. Western titles (mostly dramas) declined sharply – from 80% in the Initial Phase to 32% in the Consolidation Phase. Non-Western titles were absent in the Initial Phase but made up 26% of the titles in the Consolidation Phase. The share of domestic titles rose from 20% in the Initial Phase to 42% in the Consolidation Phase, as many of these dropped out of the Top 10 and into this lower-rated tier.

The overall rating of this list declined more steeply than for the Top 10 (Initial Phase: 10.36%, Transition Phase: 8.13%, Consolidation Phase: 5.99% AMR). Ratings became increasingly concentrated around telenovelas from the Top 10 list and the higher-ranked titles in the 11–20 range, where sitcoms and telenovelas popular among PE viewers predominated. In the Consolidation Phase, the number of episodes rose (Initial Phase:

Genre	Initial Phase			Transition Phase			Consolidation Phase					
	Total	PE	SE	HE	Total	PE	SE	HE	Total	PE	SE	HE
<i>Soap opera</i>	18.90	23.69	14.88	15.63	12.60	18.06	9.47	9.40	12.85	20.55	10.65	6.57
Soap	16.04	20.56	13.27	14.76	10.38	15.36	6.97	9.64	-	-	-	-
Telenovela	21.75	26.81	16.49	16.49	14.82	20.76	11.96	9.16	12.85	20.55	10.65	6.57
Telenovela per episode	21.65	26.56	16.45	16.45	15.26	21.59	12.35	9.62	13.72	22.64	11.24	6.78
<i>Drama</i>	17.55	17.43	17.78	17.10	10.65	9.04	11.61	11.45	11.34	14.78	10.95	5.89
Action-adventure	13.93	12.74	15.11	12.59	9.35	8.98	9.87	8.37	8.46	10.43	8.82	4.09
Crime	12.49	11.50	13.40	11.71	10.81	8.21	11.83	14.19	11.38	13.25	11.85	6.81
History	31.28	36.10	28.40	29.71	-	-	-	-	-	-	-	-
War	21.45	21.71	21.94	19.04	-	-	-	-	-	-	-	-
SF	12.70	9.76	14.67	13.18	10.35	7.21	12.04	12.64	-	-	-	-
Soap drama	13.46	12.75	13.14	16.39	12.09	11.74	12.71	10.61	-	-	-	-
TV musical	-	-	-	-	-	-	-	-	14.19	20.65	12.17	6.78
<i>Comedy</i>	13.29	14.74	12.55	12.28	12.53	12.30	11.05	10.50	11.55	11.63	11.25	11.49
Milieu comedy-drama	11.38	12.00	10.88	11.70	10.93	12.80	9.91	9.59	12.40	8.25	12.88	17.68
Romcom	-	-	-	-	11.84	13.72	10.64	11.22	-	-	-	-
Sitcom	15.20	17.48	14.22	12.86	14.12	17.42	12.61	10.68	10.42	15.00	9.61	5.30

271; Transition Phase: 270; Consolidation Phase: 412). This increase resulted not only from the inclusion of soap operas but also from the practice of daily reruns of long-running detective series in weekday prime-time slots. For instance, in the 2017/2018 season, 353 episodes of *Navy CIS* and 160 episodes of *The Mentalist* were included on the list, although *The Mentalist* had been listed with 116 episodes in a previous season. Similar practices applied to Western middlebrow sitcoms which, although not included on the list, followed similar scheduling patterns. For genre and country-of-origin shares, see Table 3; for genre ratings, see Table 4.

Table 3. Top 11-20 Total: Share (%) of Titles by Genre and Country of Origin Across Phases

Genres	Initial Phase		Transition Phase		Consolidation Phase	
	Titles (%)	Origin of titles (%)	Titles	Origin of titles (%)	Titles	Origin of titles (%)
Soap opera	6		14		24	
Telenovela	0		14	HR 2 TR 6 IND 2 RS 4	22	HR 10 TR 12
Soap	6	HR 4 IT 2	0		2	HR 2
Drama	78		68		42	
Crime	52	USA 32 HR 4 D 14 UK 2	40	USA 36 HR 2 UK 2	24	USA 10 UK 10 AUS 2 HR 2
Action-adventure	8	USA 6 D 2	0		2	USA 2
911 (rescue series)	6	USA 6	0		0	
Hospital drama	6	USA 6	6	USA 6	2	USA 2
History	2	HR 2	6	DE 2 HR 2 USA 2	3	TR 2 HR 2 IT 2
Soap drama	2	SAD 2	10	USA 6 HR 2 SRB 2	2	SRB 2
Costume drama	0		2	UK 2	2	AUS 2
Horror	0		2	USA 2	0	
Documentary drama	0		2	HR 2	2	HR 2
SF	2	SAD 2	0		0	
Political drama	0		0		2	HR 2



Genres	Initial Phase		Transition Phase		Consolidation Phase	
	Titles (%)	Origin of titles (%)	Titles	Origin of titles (%)	Titles	Origin of titles (%)
Comedy	16		18		34	
Sitcom	14	HR 8 UK 6	14	HR 14	20	HR 12 BiH 8
Milieu comedy-drama	2	HR 2	2	HR 2	10	HR 10
Mockumentary	0		2	HR 2	0	
Sketch comedy	0		0	HR	4	UK 2 SRB 2

Legend: AT = Austria; AU = Australia; BiH = Bosnia and Hercegovina; DE = Germany; HR = Croatia; IN = India; IT = Italy; USA = United States; RS = Serbia; TR = Turkey; UK = United Kingdom.

Lists of Educational Groups

In addition to the Total lists, Top 10 and Top 11-20 lists were also analysed for three educational subgroups: PE, SE and HE. These lists reveal clear differences in genre preferences, country of origin, and ratings. The most pronounced contrasts were observed between the PE and HE lists.

On the Top 10 PE list, a shift occurred from domestic dominance (62% of titles in the Initial Phase) to non-Western dominance (72% in the Consolidation Phase), along with the rise of the telenovela as the dominant genre (80%). The overall AMR% of the PE list increased over time. In contrast, the Top 10 HE list featured the smallest share of non-Western titles (24% in the Transition Phase and 34% in the Consolidation Phase) and the highest share of Western titles (66% in the Initial Phase and 42% in the Consolidation Phase), with drama consistently dominant. This was the only list in which Western titles remained dominant in the Consolidation Phase, and it was the list with the steepest drop in AMR%. The Top 10 SE list also reflects a marked shift: Western titles dominated the Initial Phase (64%), while non-Western titles dominated the Consolidation Phase (68%). Telenovelas overtook drama as the leading genre (see Table 5).

Table 4. Genre Ratings (AMR%) for Top 11-20 Television Programmes by Educational Group Across Phases

Genre	Initial Phase			Transition Phase			Consolidation Phase		
	Total	PE	SE	HE	Total	PE	SE	HE	HE
<i>Soap opera</i>	10.05	13.17	8.84	6.34	8.05	9.47	7.48	5.48	4.15
Soap	10.05	13.17	8.84	6.34	-	-	-	-	4.53
Telenovela	-	-	-	-	8.05	9.74	7.48	5.48	3.76
<i>Drama</i>	10.48	10.28	10.62	10.40	7.97	7.49	8.14	8.31	5.05
Crime	10.51	9.37	11.49	9.71	7.98	6.21	8.92	9.31	5.74
Action-adventure	11.98	10.83	12.56	12.01	-	-	-	-	4.73
911 (rescue series)	9.93	8.01	11.47	9.28	-	-	-	-	-
Hospital drama	9.86	8.54	10.14	12.31	8.84	7.05	9.57	11.03	6.45
Soap drama	11.80	14.27	11.19	8.02	7.97	6.34	8.38	8.86	5.02
History	10.10	11.76	8.25	12.64	7.91	8.12	7.99	6.98	4.56
Costume drama	-	-	-	-	8.45	8.35	7.34	12.63	5.40
Horror	-	-	-	-	7.62	7.27	8.37	5.67	-
Documentary drama	-	-	-	-	7.04	9.09	6.40	3.70	2.12
SF	9.17	9.17	9.26	8.85	-	-	-	-	-
Political drama	-	-	-	-	-	-	-	-	-
<i>Comedy</i>	10.26	12.08	9.22	9.62	8.84	9.30	8.56	8.67	6.42
Sitcom	9.38	8.94	9.65	9.66	8.58	10.86	7.43	6.58	4.71
Milieu comedy-drama	11.13	15.21	8.79	9.58	9.93	10.86	9.39	9.63	4.80
Mockumentary	-	-	-	-	8.01	6.19	8.87	9.80	5.55
Sketch comedy	-	-	-	-	-	-	-	-	-
									3.78
									5.08
									6.84
									5.35
									6.08
									7.75
									7.16
									9.53
									6.64
									5.21
									6.87
									5.74
									6.84
									5.08
									4.71
									4.80
									5.55
									-
									3.78

Table 5. Top Lists of Educational Groups: List Ratings (AMR%), Genre Group Ratings (AMR%) and Shares (%), and Number of Episodes per Season

	Initial Phase	Transition Phase	Consolidation Phase
Top 10 PE			
AMR%			
Top 10 PE	17.44	17.72	19.33
Drama	16.64	10.19	15.64
Comedy	16.46	15.71	16.00
Soap opera	19.99	20.36	20.03
Genres share (%)			
Drama	34	4	10
Comedy	40	48	10
Soap opera	26	48	80
Episodes per season	469	689	807
Top 11-20 PE			
AMR%			
Top 11-20 PE	9.77	8.06	7.38
Drama	9.83	7.74	5.32
Comedy	9.84	7.82	8.26
Soap opera	8.79	8.93	8.24
Genres share (%)			
Drama	86	62	28
Comedy	8	14	46
Soap opera	6	24	26
Episodes per season	220	327	335
Top 10 SE			
AMR%			
Top 10 SE	15.08	12.20	10.68
Drama	14.85	11.08	11.37
Comedy	15.70	12.50	9.78
Soap opera	16.12	12.68	10.81
Genres share (%)			
Drama	60	26	10
Comedy	24	34	18
Soap opera	16	40	72
Episodes per season	348	629	747
Top 11-20 SE			
AMR%			
Top 11-20 SE	10.86	8.39	5.59
Drama	11.19	8.45	5.07
Comedy	10.23	8.38	5.94
Soap opera	9.63	7.91	6.06
Genres share (%)			
Drama	68	70	44



Comedy	28	14	30
Soap opera	4	16	26
Episodes per season	277	243	457
Top 10 HE			
AMR%			
Top 10 HE	14.98	11.66	7.60
Drama	14.87	11.42	6.92
Comedy	13.77	11.90	9.07
Soap opera	16.23	12.09	7.94
Genres share (%)			
Drama	58	56	46
Comedy	26	24	12
Soap opera	16	20	42
Episodes per season	321	393	490
Top 11-20 HE			
AMR%			
Top 11-20 HE	10.33	8.04	5.36
Drama	10.24	8.13	5.40
Comedy	10.76	8.21	5.05
Soap opera	-	7.69	5.45
Genres share (%)			
Drama	82	56	60
Comedy	18	20	16
Soap opera	0	24	24
Episodes per season	192	359	396

DISCUSSION AND CONCLUSION

The analysis of average minute ratings (AMR%) for prime-time series on national terrestrial channels between 2003 and 2018, based on a representative sample of Croatian adults, reveals major shifts in genre distribution. The genre diversity that characterised the Top 10 Total list in the Initial Phase was gradually replaced by the dominance of a single genre – the telenovela – in the Consolidation Phase. These findings confirm the hypothesis. More broadly, the results indicate tectonic shifts not only in genre composition but also in the cultural orientation and legitimization of universally accessible popular series. These shifts unfolded in parallel with structural transformations in the television system itself.

Genre diversity and Western dominance in the Initial Phase. In this phase, ten genres appeared on the Top 10 list. Crime and sitcom – the most popular and enduring genres of Western linear television (Creeber, 2015) – each accounted for about 30% of the titles. As in Western markets (e.g., Stoll, 2021), drama held the largest share; it was also the most genre-diverse category and consisted largely of Western productions. Comedy, the second most prevalent genre group, was primarily represented by domestic series focused on family life and local communities. Soap operas had the smallest overall share,

comprising a roughly equal mix of Western soaps and domestic telenovelas. The share of domestic titles was 42%, and that of Western titles was 56%. These figures closely mirrored the overall ratio between Western and domestic series during socialism, when Croatian television culture was ambitious, transnational, open, and oriented towards the West (Mihelj & Huxtable, 2018).

Dominance of the telenovela and decline of drama in the Consolidation Phase. In this phase, only six genres remained on the Top 10 list, with the telenovela overwhelmingly dominant – accounting for 74% of all titles (Turkey: 58%; Croatia: 12%; the West: 4%).⁵ As a lowbrow genre focused on romantic and family relationships (Allen, 1995), the telenovela rose to prominence through strategic scheduling in key weekday evening slots on generalist commercial channels, where it was heavily concentrated. This was accompanied by a sharp decline in the presence of middlebrow and highbrow drama and comedy in the same slot – a period marked by a scarcity of both. These shifts were most evident in the trajectory of drama. Its share dropped drastically, and the few remaining titles were predominantly lowbrow. This stands in stark contrast to trends in Western markets, where serial drama has flourished on SVOD platforms (Lotz & Lobato, 2023) while remaining the most watched prime-time genre group on linear TV (e.g., McElroy & Noonan, 2019; TV Series Finale, n.d.). This is especially true of detective series (Creeber, 2015) and other professional dramas (Isani, 2005), which go beyond the private sphere to address social issues (Creeber, 2015). In Croatia, the absence of new prime-time drama left middlebrow – and, to some extent, highbrow – audiences underserved, particularly among viewers disinclined to watch domestic and Turkish telenovelas (Karuza Podgorelec, 2023).

The decline of comedy and the rise of lowbrow preferences. The share of comedy on the Top 10 list halved, as domestic titles were increasingly displaced by comedies from Bosnia and Herzegovina. In this shift, the dominant family sitcom took on a distinctly lowbrow profile. A similar pattern appeared on the lower-rated Top 11–20 list: a rising share of non-Western telenovelas and sitcoms, a sharp drop in Western drama and comedy, and waning interest in domestic series that neither followed the telenovela formula nor aligned with lowbrow taste – especially compared to their non-Western counterparts.

Narrative shifts from public engagement to private sphere. Under the monopolistic system, domestic series – then limited to drama and comedy – typically blended personal and public themes, ranging from history and politics to professional life. These narratives did not follow soap opera conventions (Mihelj & Huxtable, 2018, pp. 159-161, 165-167). Professional dramas like police procedurals and hospital dramas were imported from the West (Vučetić, 2018). In the early decades of the 21st century, popular terrestrial television gradually abandoned narratives centred on professions and broader social concerns, shifting instead to the private sphere. Unlike Western trends (Creeber, 2004; Prado et al., 2020), Croatian broadcasters relied on a narrow genre and geo-cultural repertoire of low cultural value, tailored to the tastes of those with the lowest cultural capital. This was expressed through two dominant discourses: the telenovela – especially the culturally

⁵ Although the telenovela was created as a distinctly non-Western genre, local adaptations also began to develop in Europe by the late 20th century under the influence of the Latin American telenovela, particularly in countries culturally proximate to Latin America (O'Donnell, 1999).

proximate Turkish variant (Karuza Podgorelec, 2023) marked by a simplified, conservative melodrama that fuses glamour with traditional values (Gündüz, 2020; Kaynak, 2015; Panjeta, 2014) – and the local doorstep comedy, including both domestic and ex-Yugoslav productions. In some cases, the two were combined into hybrids (e.g., Pavlič, 2014).

Educational and platform-based audience stratification. In the Initial Phase, AMR% for the Top 10 Total list was relatively similar across all educational groups. Over time, however, ratings among the least educated rose, while they declined with rising levels of education – so that by the Consolidation Phase, ratings among the most educated had halved. A similar trend was evident in the Top 11–20 and in all subgroup lists: AMR% fell as education rose and increased among the least educated. This outflow of educated viewers from terrestrial television is clearly linked to the growing availability of series on Pay TV and SVoD. Media digitisation and content abundance have accelerated taste polarisation, with younger and more educated audiences adopting new viewing practices and embracing more complex narratives. Niche channels and SVoD platforms have responded accordingly, tailoring their offerings to these audiences (Lotz, 2018; Lotz & Lobato, 2023). In Croatia, however, this shift progressed more slowly than in Western markets (see HAKOM, 2011, 2019, 2022; Chalaby, 2023 vs. Ipsos, 2019, 2023; Stoll, 2024). Domestic terrestrial channels thus had greater potential to bring together diverse audiences. My findings show that middlebrow and highbrow drama, as well as milieu comedy-drama (a genre of higher cultural value), retained the strongest loyalty among the most educated – even in the Consolidation Phase. This suggests that terrestrial TV had the potential to appeal more broadly – through greater genre diversity and higher-quality content. Lizardo and Skiles (2009) found that linear television consumption among highbrow audiences is closely tied to the level of commercialisation and production quality. In Croatia, an Ipsos survey from the Consolidation Phase – mainly among SE and HE viewers – showed that Turkish telenovelas received the lowest quality ratings. Moreover, 54% of respondents wanted fewer Turkish telenovelas. While 46% expressed a desire for more available channels, 42% were unwilling or unable to pay extra for them, citing economic and other reasons (Ipsos, 2016, pp. 16, 24).

Cultural reorientation towards the Balkans. The share of Western series dropped to 10%, while 70% came from just two countries culturally tied to the Balkans (Švob-Đokić, 2001): Turkey and neighbouring Bosnia and Herzegovina. The share of domestic titles halved. As in the broader Balkan region – more neutrally referred to as Southeastern Europe (Švob-Đokić, 2001) – where cultural policy is weak, domestic creative industries underdeveloped, and foreign content dominant, commercial broadcasters increasingly turned to soap operas (Primorac, 2014; Zajović, 2014). In Croatia, this marked a shift in the cultural orientation of universally accessible popular series. These shows mediatized the construction of a post-socialist, socio-culturally specific “mixed society,” polarised between traditionalism, cultural closure, and Balkan orientation on the one hand, and openness and alignment with Western values on the other (Tomić-Koludrović & Petrić, 2007). The result is a strong popularisation of traditionalism, closure, Eastward orientation (towards the Balkans), and a narrowing of the ideological spectrum, while earlier tendencies towards cultural openness, Western orientation, and worldview diversity are

being marginalised. In this context, the Turkish telenovela – together with the patriarchal, conservative values it conveys (Gündüz, 2020; Kaynak, 2015) – became the dominant “cultural intermediary” and “taste-maker” (Bourdieu, 1984, pp. 325–326), much as Western drama once was (Mihelj & Huxtable, 2018, p. 181). It became a new benchmark of high-end television (Panjeta, 2014), while viewers with Western or ‘cosmopolitan’ middlebrow and highbrow tastes are increasingly marginalised (Krolo, Tonković & Vozab, 2023).

Conclusion: genre concentration and paradoxes of media pluralism. Between 2003 and 2018, Croatian national television underwent a profound shift in genre structure, audience composition, and cultural orientation. Genre diversity declined, and the Turkish telenovela became dominant. Scheduling logic and cultural proximity took precedence over production quality and diversity, leading to the marginalisation of drama and the decline of comedy. Educated viewers gradually abandoned terrestrial television, while commercial broadcasters increasingly targeted less educated audiences with a narrower and lower-value repertoire. Despite technological convergence, Croatian broadcasters did not follow Western production trends. Instead, they adopted programming strategies typical of low-cost, culturally proximate Eastern markets. This shift redefined television aesthetics and value hierarchies, reinforcing a lowbrow mainstream and narrowing the symbolic space of national terrestrial television. Such content concentration stands in direct contrast to the ideals of media diversity. The Croatian case shows that ownership pluralism does not guarantee a “diversity of choice” (Meier & Trappel, 1998, p. 42). Competition alone cannot ensure content diversity or quality – often the reverse is true (Meier & Trappel, 1998, p. 56). Van Cuilenburg (1999, pp. 196–197) describes this “diversity paradox”: competitive markets tend to homogenise content (“more diversity = less diversity”). Our findings support Peruško’s (2013a, pp. 49–51) argument that Western liberal models cannot be simply transposed onto post-socialist systems undergoing rapid change. Aligning democracy with the market does not yield equivalent results in societies with different value systems. Imitative policies may fail to foster the content, aesthetic, and ideological diversity essential to media pluralism and a vibrant television culture (Peruško, 2013b; Peruško & Čuvalo, 2014). The Croatian case also echoes Van Cuilenburg’s (2007) critique of liberal pluralism as a model that overemphasises market logic and quantitative indicators while undervaluing content, cultural meaning, and symbolic power. He contends that genuine pluralism requires both internal diversity and access to symbolic resources necessary for cultural legitimization – conditions especially hard to meet in small or peripheral media systems.

Previous studies on the transformation of the Croatian television system and culture have not examined genre diversity, cultural valuation, or the cultural influence of serial fiction in depth (e.g., Peruško & Čuvalo, 2014; Roller, 2014). As in broader post-socialist media scholarship, television series – and popular television more broadly (Havens et al., 2012) – have remained marginal in academic inquiry. Most studies have focused instead on journalism, democracy, and freedom of expression (Peruško et al., 2022). It is hoped that this study will help bring serial fiction – and other forms of popular television – into sharper focus in future research on the Croatian media system and television culture.

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MEDIJSKI PLURALIZAM I RAZNOLIKOST ŽANROVA TV SERIJA: PROMJENE U HRVATSKOJ TELEVIZIJSKOJ KULTURI OD 2003. DO 2018. GODINE

Vesna Karuza Podgorelec

SAŽETAK Početkom 21. stoljeća hrvatski se televizijski sustav radikalno mijenja, što dovodi do značajnih promjena u televizijskoj kulturi. Ovo istraživanje analizira razdoblje od 2003. do 2018., s fokusom na žanrovsku raznolikost, obrazovnu strukturu publike i podrijetlo popularnih TV serija. Na temelju sekundarne statističke analize gledanosti agencije Nielsen kod odrasle populacije analizira se po deset najgledanijih serija po sezoni, uz dodatne uvide iz šire liste dvadeset najgledanijih naslova. Rezultati pokazuju tektonske promjene u žanrovskoj strukturi, kulturnom usmjerenju i kulturnoj legitimaciji popularnih serija. Žanrovska raznolikost zamijenjena je koncentracijom telenovela. Zapadne produkcije gube primat, dominiraju turske serije, naslovi s Istoka istiskuju domaće naslove, a popularne serije postale su prizemne (engl. lowbrow).

KLJUČNE RIJEČI

TELEVIZIJSKE SERIJE, TELEVIZIJSKA KULTURA, ŽANR, TELEVIZIJSKE PREFERENCIJE, KULTURNI KAPITAL

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MEMES AS CULTURAL REFLECTION: A CASE STUDY OF HUMOROUS DEPICTIONS OF MARIÁN KOČNER AND THEIR SOCIETAL MEANING

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ABSTRACT *This study examines how internet memes function as reflections of public opinion and digital culture. It focuses on humorous portrayals of Marián Kočner, a Slovak businessman imprisoned for financial crimes and under suspicion of orchestrating the murder of an investigative journalist and his fiancée. Widely known to the Slovak public, Kočner has become a frequent subject of online satire. Using mixed-method content analysis, the research identifies key narratives and sentiments conveyed in popular memes. Drawing on classical theories of humour – superiority, relief, and incongruity – the study demonstrates how memes act as both entertainment and instruments of social commentary, emotional expression, and grassroots critique.*

KEYWORDS

MARIÁN KOČNER, MEME AS A NEW GENRE, HUMOUR, NARRATIVES, TONALITY,
FOLK CREATIVITY, DIGITAL CULTURE

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INTRODUCTION

Memes, as a key component of digital culture, have garnered significant attention in recent years for their ability to both entertain and critically reflect societal dynamics (Milner, 2016; Mukhtar et al., 2024; Noor & Arshad, 2024; Shifman, 2014). The study of memes intersects with various academic fields, including communication studies, digital culture, sociology, and humour theory. Memes can be understood as a form of communication that transcends entertainment, offering valuable insights into societal values, contradictions, and tensions (Cannizzaro, 2016; Wiggins, 2019). They function as social commentary, reflecting both collective sentiment and broader cultural narratives (Knobel & Lankshear, 2007; Xu et al., 2016). Memes are also inherently participatory, allowing audiences to engage with content, reshape it, and share it across a variety of digital platforms, creating an ongoing dialogue about the issues they address (Phillips & Milner, 2017).

Humour, which is often central to memes, has been the subject of extensive scholarly attention. Theories of humour, particularly those developed by Freud (1905), Bergson (1900), and more recent theorists such as Andreanský (n.d.), provide important frameworks for understanding the role of humour in society. According to Andreanský, three prominent theories stand out: the theory of dissonance, which connects humour with contradictions, absurdities, and unfulfilled expectations; the theory of superiority, which posits that humour arises from the awareness of the audience's superiority over the object of humour; and the theory of relaxation, which suggests that humour releases psychological tension (Andreanský, n.d.). Each of these theories offers a lens through which memes can be analysed as a form of cultural expression, highlighting how they function not only as entertainment but also as a medium for negotiating societal issues.

Memes are especially potent in the digital age due to their widespread reach and rapid dissemination through social media (Joshi et al., 2024). They allow individuals to participate in public discourse in a way that was previously inaccessible to many. As such, memes are increasingly viewed as an important cultural artefact in contemporary media studies, functioning as an accessible and democratic form of communication that provides insight into the issues and tensions of the society that produces them (Maniyamkott, 2017). They reflect how digital communities engage with social issues, often distilling complex topics into simplified and often viral content.

The significance of memes in digital culture is further exemplified in the portrayal of controversial public figures, such as Marián Kočner, a Slovak businessman whose legal troubles and media presence have kept him in the spotlight. Kočner's media image offers an interesting case for analysing how memes reflect societal perceptions and public sentiment. Experts have noted that before his imprisonment in June 2018, Kočner played a significant role in influencing serious opinion-forming media and also tabloid outlets, including disinformation media (Rončáková & Sámelová, 2023). A carefully crafted persona marked his media presence – he was perceived as a controversial businessman, even a showman, who knew how to engage with the media. Kočner was particularly

compelling to the press due to his eccentric behaviour, often clashing with societal norms (Rusnák, 2010).

Thanks to his frequent appearances, such as on the popular TV show “Smotánka,” and his statements about personal topics like weight loss, Kočner became a familiar figure to the public. He was perceived as “striking, unusual, sticking out of the crowd” (Rusnák, 2010, p. 47). This made him a media personality with a certain “celebrity status” even before his criminal activities became more widely known, indicating a reciprocal relationship between Kočner and the media, which reflects how his public persona was shaped through media interactions and how his portrayal was cultivated to maintain his presence in the public eye (Rončáková & Sámelová, 2023).

In the context of this study, memes surrounding Kočner offer a rich source for exploring how digital culture influences the portrayal of controversial figures. Memes, created by ordinary individuals and spread through social media, function as both a reflection of public perception and a tool for societal commentary (Javed et al., 2022). By analysing these digital artefacts, this research aims to examine how memes are used to critique, satirize, and sometimes even glorify such figures, thereby contributing to broader societal narratives.

The research presented in this study aims to address the gap in understanding how memes function as a cultural reflection of society. By analysing the memes related to Kočner, this study seeks to uncover the narratives and sentiments embedded in these digital creations, offering insight into how memes can serve as a mirror to society. The research will employ a mixed-methods approach, combining both quantitative and qualitative analyses to explore the dominant themes, sentiments, and humour strategies present in Kočner-related memes.

Through this analysis, the study will contribute to the growing body of research on memes as a genre and provide a clearer understanding of how they function as a form of social commentary. In doing so, it will highlight the importance of memes as a tool for reflecting and negotiating societal issues, helping us better understand their role in digital culture and their impact on shaping public opinion and societal discourse.

THEORETICAL BACKGROUND

This study focuses on how memes serve as reflections of societal dynamics, providing a space for public dialogue and commentary. It explores them as a medium that encapsulates collective sentiments and societal tensions (Illloh, 2021; Panikidis, 2024).

Memes, as a relatively new genre, have caught the attention of scholars across various fields. They have been categorized within the context of postmodern digital culture, regarded as a cultural practice emerging from online spaces (Piantavinha, 2022). The term “meme” originates from Richard Dawkins’ seminal work *The Selfish Gene* (1976), where he

defines memes as ideas that spread through society, much like genes, as part of a process of cultural evolution (Dawkins, 1976). The concept has evolved in the Internet era, with memes now being seen as “supertraits” of the online environment, growing to represent viral cultural information that spreads across digital platforms (Rusnák, 2013).

Memes are an important element of contemporary digital culture, sometimes representing the whole community of web users and at other times serving more niche groups (Schifman, 2014). A meme can become viral not merely due to its content but because it is “memetic,” meaning it represents recognizable cultural information that spreads through voluntary participation in online spaces (Jenkins et al., 2009; Knobel & Lankshear, 2006). This collective process of participation leads to the viral potential of a meme, driven by its humour, controversy, or uniqueness (Šoltésová, 2016).

In the context of virality, Gábor also refers to foreign websites that label a successfully spreading humorous product with the phrase “become a meme, turn into a meme”, i.e., for a product to become a meme, it needs to be successfully accepted in the web-based social interactions, becoming a real meme as a result; otherwise, it is just a case of memetic creation process that did not lead to the successful spread of the meme (Gábor 2021, p. 59-60). Other experts believe that a prerequisite for a meme virality is common knowledge, information, and shared meanings, as memes speak the same language and create a unified language (Puri, 2021). As is evident, the significance of memes can be talked about not only in determining the virtual nature of digital culture but also in the context of collective thinking (Petrova, 2021). This makes memes not only a cultural practice but also a popular genre of humour and a digital culture phenomenon.

Within media communications, memes are often viewed as a form of humour that reflects societal contradictions, absurdities, and conflicts. The humour that emerges in memes often exaggerates reality, offering a satirical or ironic portrayal of controversial topics (AlAfnan, 2025). In this way, memes serve as a vehicle for processing and commenting on real-world events, particularly those that are otherwise uncomfortable or negative (Colombo, 2022). For instance, memes about Marián Kočner’s involvement in several criminal cases – such as the financial fraud concerning Markíza Television, the Technopol theft, or his involvement in the murder of investigative journalist Ján Kuciak and his fiancée – highlight how memes engage with sensitive societal issues. These digital artefacts offer a humorous outlet for public commentary on serious matters that might otherwise be too overwhelming or divisive to discuss openly (Ivanova, 2022).

Importantly, memes are not just a simple visual or humorous experience. They also carry emotional weight and sentiment, shaped by both the creators and their audience. Thus, memes act as carriers of collective emotion, contributing to the formation of public opinion (Flecha Ortiz et al., 2020; Tabatabaei & Ivanova, 2023). By simplifying complex issues and offering emotional release, memes make difficult topics more accessible, allowing users to engage with them on an emotional level (Ivanova, 2022). This emotional connection, coupled with the viral nature of memes, allows them to reach wide audiences and foster shared understanding and discourse about contemporary issues.

The significance of memes goes beyond entertainment; they serve as a bridge between digital culture and societal narratives (Wiggins, 2019). As vehicles for humour and sentiment, memes shape collective perceptions and reactions to contemporary events (AlAfnan, 2025). Rather than being tools for building individual image and status, memes offer a powerful form of social commentary, reflecting and negotiating societal issues in real time (Singh, 2024). By analysing memes in the context of figures like Kočner, this study contributes to our understanding of how digital artefacts function as mirrors of society, offering insights into public attitudes and the cultural dynamics at play.

METHODOLOGY

Our research aimed to analyse the narratives and the tonality of media content surrounding Marián Kočner, as represented through memes. To achieve this, we utilized content analysis in its qualitative form, which is particularly effective in examining media content and offering a deeper understanding of the material (Macnamara, 2005; Schreier, 2012). This method enables the description and quantification of research phenomena and allows for interpretation and contextualization of the variables involved, highlighting broader social issues (Janoušek, 2007).

In this study, “narratives” refer to main themes that emerge in the memes. Within qualitative analysis, narratives focus on how Marián Kočner is portrayed and the messages conveyed through these depictions. The main narratives can include topics such as interpretative framings of Kočner’s communication, societal critique, narratives of organised crime, judicial discourse, or representations of sentencing severity.

The “tonality” of the memes, on the other hand, refers to the emotional tone (e.g., sentiment) or attitude expressed in the content (Alluri & Dheeraj Krishna, 2021). This includes whether the memes are positive, negative, or neutral-toned in their portrayal of Marián Kočner. The tonality provides insight into the emotional undertones and how the memes emotionally affect the audience (French, 2017).

In addition to the qualitative analysis, a quantitative approach was applied to measure the prevalence of specific narratives and the tonality (i.e., emotional tones) of Marián Kočner’s portrayal within the memes. This mixed-methods approach offers a comprehensive exploration of the subject matter by combining both qualitative and quantitative techniques, which enhances the depth and reliability of the findings (Hendren et al., 2003; Lieber, 2009; Patton, 1999). The integration of these methods allows for a more nuanced understanding of the research phenomenon and helps to strengthen the validity of the study (Haq, 2014; Hussein, 2009; Östlund et al., 2011).

Data collection, classification, and evaluation were conducted from April to June 2023. The research followed an inductive approach, moving from data collection to developing conclusions and theory. Regarding research of the tonality of media content about Marián Kočner, an initial open coding was performed to identify recurring emotional

undertones in the memes. Based on this coding, three main tonality categories were inductively developed: negative, neutral, and positive. These categories were then applied deductively across the entire dataset to ensure consistency and comparability. This approach allowed for a transparent and systematic classification of tone, reflecting the actual distribution of tonality within the sample (Amsler & Wüest, 2016).

Building on this foundation, we applied a multi-stage coding process for the qualitative classification inspired by thematic analysis. The process involved initial open coding, during which key patterns and visual cues were identified directly from the content. As Braun and Clarke emphasise, thematic analysis is a flexible and useful research tool that can provide a rich and detailed, yet complex, account of data (Braun & Clarke, 2006). Subsequently, based on their conceptual similarity, these elements were grouped into thematic categories through axial coding.

To illustrate the coding process in practice, for instance the category “Societal critique and reflections on public affairs” included memes that portrayed Kočner as a symbol of systemic corruption, offering a satirical critique of perceived elite impunity. Similarly, within the “Narratives of organised crime and criminal subculture category”, memes often depicted Kočner as a parody of mafia bosses from popular culture, such as placing him in a Godfather-like pose, highlighting the criminal undertones of his public image.

To ensure analytical rigour and consistency across the dataset, we developed a coding guide that clearly defined each category (e.g., reinterpretations of Kočner’s Threema messages, satirical commentary on political apathy and elite impunity, caricatures of Kočner as a mafia boss, or mockery of courtroom delays and procedural absurdities) and applied it systematically across all memes.

This coding strategy reflects Schreier’s emphasis on transparency and consistency in qualitative content analysis, ensuring that the interpretation of cultural products such as memes remains both systematic and replicable. As Schreier notes, the aim of qualitative content analysis is not merely to describe data, but “to assign meaning to it in a structured and rule-governed way” (Schreier, 2012, p. 28).

Finally, to enhance the reliability of the analysis, two independent researchers conducted the classification. Any discrepancies were resolved through discussion, which helped strengthen the reliability of the coding process.

The sample consisted of 30 memes collected from the satirical website Emefka, known for its viral content spread across its website and Facebook page, which, at the time of writing, had 465,000 users. This platform is particularly notable for its user-generated content, where fans actively participate in creating the memes. Moreover, Emefka is one of the most popular aggregate sources in Slovakia, compiling viral memes from various social media platforms. It features regular popularity charts, showcasing the most viral memes on specific topics, such as the visit of Pope Francis in Slovakia or the war in Ukraine.

Additionally, the website aggregates content from other well-known Slovak humoristic-satirical outlets.

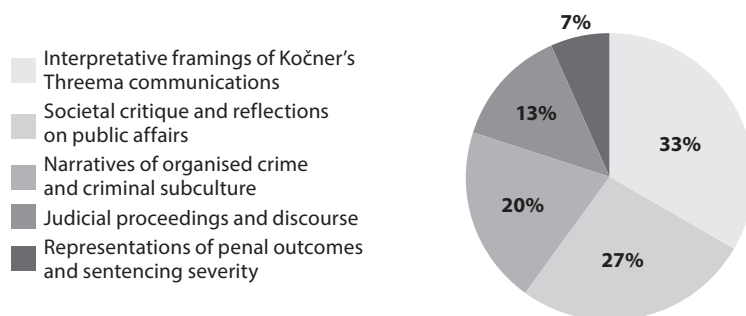
RESEARCH FINDINGS

The findings identify and analyse the narratives and tonality in the analysed memes. By examining Marián Kočner's portrayal, the study reveals how memes shape public perceptions of controversial figures and highlights their role in reflecting societal issues.

The presented findings specify the narratives communicated by the analysed memes, quantify them, and subsequently categorize the memes according to the authors' sentiment.

The Identification of Narratives Present in the Memes About Marián Kočner

Based on the semantic features of individual memes in our research, five main categories of narrative were established, as presented in Figure 1. The most represented narrative category is "Interpretative framings of Kočner's Threema communications", which includes memes depicting the content of Marián Kočner's conversations with others, presented to the public as "Kočner's Threema"¹. Out of the total sample of analysed memes (n=30), 10 memes were classified into this category. Other narratives include "Societal critique and reflections on public affairs" (8 memes, i.e., 26.4%), followed by "Narratives of organised crime and criminal subculture" (6 memes, i.e., 19.8%). These were followed by "Judicial proceedings and discourse" (4 memes, i.e., 13.2%) and, finally, "Representations of penal outcomes and sentencing severity" (2 memes, i.e., 6.6%).



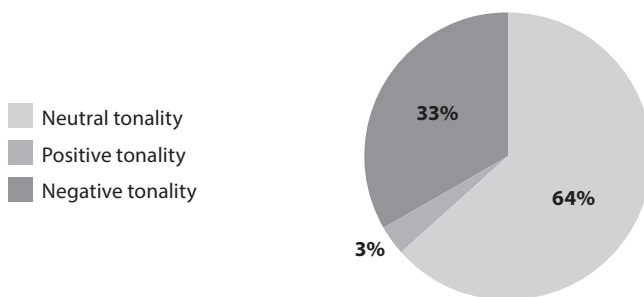
▲ Figure 1.

The most significant narratives about Marián Kočner in the research set (n=30)

¹ Kočner's Threema, that is communication via the Threema application. The content reveals Marián Kočner's exchanges with politicians, judges, business partners, lovers, etc. It represents evidence in the trial of the murder of investigative journalist Ján Kuciak and his fiancée and is understood as an imaginary point in the public life of Marián Kočner, who worked his way from the position of a controversial but socially respected businessman, through the position of a mafia member to the position of a defendant in a murder case. He was ultimately acquitted of the murder but convicted of economic crimes.

The Tonality of Media Content About Marián Kočner Depicted through Memes

As Figure 2 shows, negative tonality was the most represented tonality in the research set (19, i.e., 63.27%). The second most represented is neutral tonality (10, i.e., 33.3%). We recorded positive tonality in the portrayal of Marián Kočner through memes in only one case (1, i.e., 3.3%)



▲ Figure 2.
Tonality of Marián Kočner's portrayal in the research set (n=30)

Specification of Research Findings

The examined memes reflect the period between April and June 2023, which, from the perspective of socio-political events, is significantly marked by the re-acquittal of Marián Kočner for ordering the murder of Ján Kuciak and his fiancée, Martina Kušnírová. The paradox of the verdict lies in the court's acknowledgment of the businessman's innocence while the media underscore the absurdity of the ruling.

The most frequently represented narrative centers on the content of Threema. This prominence is related to the extensive media coverage of its contents and the revelations brought forth by Marián Kočner's encrypted communications. The Threema exchanges reinforce the image of Marián Kočner as an unconventional figure who, while at times enjoying the favour of the media and societal elite, is unhesitant to compromise moral standards and operate on the edge of legality to achieve his goals, as seen, for example, in Picture 1. The analysed memes vividly depict these realities, effectively excluding alternative interpretations.

Another aspect of the interpretative framings of the narrative "Interpretative framings of Kočner's Threema communications" is the use of vulgarity as a source of humour – reflecting the tone of Kočner's actual Threema messages, which were publicly released by Slovak media without any censorship as illustrated, for example, in Picture 2.



Picture 1.

Kočner in public vs. Kočner in Threema
(Translated text from Picture 1; top to bottom:
Kočner in public; Kočner in Threema)



Picture 2.

The vulgarity typical for Marián Kočner's communication
(Translated text from Picture 2: *Bro, reading Threema?*
That son of a bitch Kočner fucking stole our lyrics!)

A distinctive feature of the memes categorized under "Societal critique and reflections on public affairs" involves the depiction of Kočner's network of allies, which included figures from the media and cultural sectors. The research memes illustrate how interconnected power structures negatively influence the functioning of society and how these powers can be manipulated for personal gain (see, e.g., Picture 3).



Picture 3.

Power dynamics and connections in Kočner's Threema communications
(Translated text from Picture 3; top to bottom:
privatisation; the boss; old friends, enemies of the liberals;
Luxurious apartment (with what money?); virality ensured;
Despicable me (2010); careful tomorrow; double vlog
power; product)

In the category "Narratives of organised crime and criminal subculture", we can mention memes referencing the mafia and mafia-like practices that visually portray Marián Kočner as a mafia figure. The creators of the memes exaggerate his behaviour specifically to emphasize this characteristic. Memes depicting Marián Kočner often liken him to the figure of the so-called Godfather. The image is typically accompanied by text that contrasts with the outward polish – while the person is portrayed as polite and elegantly groomed, the text highlights their coarse nature and describes their criminal acts, which went unpunished (see, e.g., Picture 4).



Picture 4.

Reference to organised crime

(Translated text from Picture 4: *The court: Marián Kočner and his ally Alena Zsuzsová are innocent in the case of Ján Kuciak's murder; Kočner: Picture*)

As an example of the category "Judicial proceedings and discourse", we can mention memes that depict the legal process surrounding Marián Kočner's trial. These memes highlight two facets of Slovak society: one that reflects a state of disintegration, as suggested by the dominant narratives, and another that indicates a gradual transformation, characterized by a growing intolerance toward controversial and morally questionable actions (see, e.g., Pictures 5 and 6).



Picture 5.

We don't say "murderer", we say "innocent"

(Translated text from Picture 5: *In Slovakia we don't say "Murderer" we say "Innocent" and I think that's sign to get the fuck out here.*)



Picture 6.

Marián Kočner – innocent

(Translated text from Picture 6: Someone: Nobody is capable of pissing off the entire Slovak population, from village nitwits to elite of Bratislava café.

Matel and Stieranka: Hold my beer!
INNOCENT)

In the category of “Representations of penal outcomes and sentencing severity”, the memes not only focused on the trial itself but also highlighted the unexpectedly low severity of Kočner’s sentences. Given the scale of his illegal activities, these sentences were seen as disproportionately lenient. Many memes criticize the Slovak judiciary for lacking the power to impose rightful punishments on perpetrators who, due to their influential connections, manage to secure minimal penalties or, in some cases, even avoid punishment altogether. In this context, Marián Kočner is depicted as a representative of a group of those with powerful connections, who often escape despite the gravity of their actions (see, e.g., Picture 7).



Picture 7.

The criticism of Slovak courts

(Translated text from Picture 7: Kočner got merely a fine of €5000... That is as if he got three fines of €1659 for not wearing a face mask during Corona crisis)

In addition, in the category of “Representations of penal outcomes and sentencing severity”, the only positively rated meme was also included. It highlights an aspect of bitter yet fundamentally positive evaluation. While the meme points out the lenient sentence Marián Kočner received for serious economic fraud, the author pays tribute to him for how long he managed to stay free and how he was able to remain an accepted figure in power circles despite political turbulence and changes (see, e.g., Picture 8).



Picture 8.

Compliments

(Translated text from Picture 8: *Mission passed! Respect. Minus 5000 dollars*)

Discussion

This study set out to explore how humorous internet memes depicting Marián Kočner – one of the most controversial figures in contemporary Slovak public life – serve as a mirror reflecting societal values, frustrations, and critiques. Grounded in the dual aim of identifying dominant narratives and analysing the tonality used by meme creators, our research highlights how digital folk creativity responds to and comments on real-life socio-political events.

From a theoretical perspective, the study draws on the conceptual framework of digital folk creativity. The classification of memes as a form of popular creativity is justified not only by our research but also by various scholarly sources referenced in this article. Meme creators are typically non-professionals who voluntarily engage in producing content inspired by current events. Their work is marked by anonymity and a tendency to interpret reality through media representations, which are then transformed visually. These characteristics – spontaneity, informality, shared cultural understanding, and collective dissemination – align memes with the principles of contemporary folklore (Maniyamkott, 2017).

Digital environments amplify this phenomenon. Unlike traditional journalism, which is constrained by ethical norms and editorial oversight, the digital space encourages the de-professionalisation of content creation. Anyone can become a content creator, and while external regulations may exist, they are not always internalised by users. In this environment, amateur authors generate new visual, textual, and auditory forms that reflect shared cultural experiences. Within this context, memes emerge as a dynamic genre characterized by recurring motifs and intertextual references (Rončáková & Sámelová, 2023).

Memes frequently employ repeated visual or textual elements – close-ups of Kočner in a suit (symbolising status) or his characteristic smirk (interpreted as a mockery of the judicial system's inefficacy) – which become easily recognizable due to their alignment

with collective memory. These elements often appear in hybrid forms, combining photographs, drawings, and film stills. Such visual cues support the notion that memes entertain and communicate layered social commentary (Andreanský, n.d.; Bergson, 1900; Freud, 1905).

The vulgarity observed in our sample is a striking feature. While it often serves as a source of humour, its significance lies in its hyperbolic function – exaggerating Kočner's controversial behaviour and language. Since the public was exposed to Kočner's vulgar rhetoric in media coverage, meme creators draw on this to accentuate his perceived immorality (Rončáková & Sámelová, 2023). Although meme authors are typically anonymous, the vulgarity they express is, in fact, legitimised by its prior presence in the public media space (Rusnák, 2010). Thus, the fusion of folk-like expression and emotional intensity appears as a defining trait of internet memes and contemporary Slovak society.

Despite the use of vulgarity, the overall tone of the analysed memes is not predominantly negative. A particularly noteworthy finding is that 63% of the memes present a neutral tone toward Kočner. This is unexpected given the controversial nature of the subject. Neutral-toned memes are mainly linked to the end of Kočner's era and depict news of this development with humorous detachment (see, e.g., Picture 9). Their primary function is informational rather than judgmental, which in our research may signal a shift in memes' focus from individual condemnation to broader societal critique.



Picture 9.

Condemning the era of the controversial businessman

(Translated text from Picture 9 (left to right):
Meme about Kočner's life sentence; the creators of meme)

Within this context, it is important to note that the use of humour in memes, especially when directed at individuals and societal specifics, might influence public perceptions. Given the potential for such content to shape opinions, meme creators and platforms bear an ethical responsibility in how they present and spread these depictions. The ethical responsibility of platforms in managing content becomes especially critical in light of the rapid spread and potential harm of meme-driven narratives. Likewise, meme creators,

while typically anonymous, may not always fully consider the impact their content has on public understanding, potentially contributing to the spread of misleading narratives (Baker & Walsch, 2024; Hamid & Afshana, 2024). Additionally, memes can distort serious issues through their simplified, humorous approach, which may trivialize the gravity of social and political concerns (Erllichman & Pluretti, 2023; Milner, 2018; Nissenbaum & Shifman, 2017). In other words, while memes are often seen as forms of satire or parody, their ability, for example, to perpetuate misinformation or distort realities must raise questions about their ethical role in shaping societal discourse.

Similarly, regulatory concerns emerge, as the lack of formal oversight on meme creation and dissemination presents challenges in controlling harmful content (e.g., defamatory content, cyberbullying or reputational damage) (Gillespie, 2018; Phillips & Milner, 2017). Furthermore, while platforms may implement community guidelines, the inconsistent application of these policies, the sheer volume of content generated, the subjective nature of meme interpretation, or the difficulty in tracing the origin of viral memes make it challenging to enforce regulations effectively, leading to concerns about accountability in the digital space (AlAfnan, 2025; Jhaver et al., 2019).

As we can see from research findings, researched memes reflect public frustration with systemic dysfunctions, especially in the Slovak judiciary, executive, and legislative branches. The symbolic condemnation of Kočner thus extends beyond the individual and addresses deeper institutional failures (Rončáková & Sámelová, 2023). This might point to a potential evolution in collective awareness and indicate increased sensitivity to socio-political issues. Whether this represents genuine societal progress remains a subject for further interdisciplinary research, especially in determining if memes can be used as a sociological tool to reflect the state of society (see, e.g., Picture 10).

5 fáz, ktorými si prejdeš pri čítaní Kočnerovej Threemy:



Picture 10.

Societal Attitudes

(Translated text from Picture 10: *Five phases you go through when reading Kočner's Threema*)

We can state that from the perspective of the audience, memes serve both emotional and social functions, acting as carriers of collective sentiment and tools for public discourse within digital communities. Discovering a meme that aligns with one's views can evoke a sense of relief and reinforce belonging within a like-minded community (Ivanova, 2022; Maniyamkott, 2017). Conversely, disagreement with a meme's message can provoke emotional responses, such as anger, which often manifest in comments or verbal aggression – ironically serving a similar cathartic purpose (Bergson, 1900; Freud, 1905). The possibility of immediate interaction through commenting, liking, or sharing facilitates meme virality.

For a meme to go viral, it must be quickly understood and elicit a strong humorous reaction, driven by its memetic qualities such as humour, controversy, or uniqueness (Jenkins et al., 2009; Knobel & Lankshear, 2006; Šoltéssová, 2016). In our research, only one out of 30 memes initially lacked clear interpretability (see, e.g., Picture 11). After analysis, it was attributed to a narrative referencing Kočner's repeated legal trials, using a computer game metaphor to highlight his seeming invulnerability. Despite its complexity, the meme ranked among the most popular, suggesting that the audience possessed adequate interpretive skills to decode its layered message.



Picture 11.

The trial of the accused – the Winner

We can see that understanding and appreciating a meme requires the ability to comprehend hyperbole, irony, satire, and paradox. Memes demand a level of metacognitive awareness that enables users to grasp the underlying incongruities and humour (Andreanský, n.d.; Ivanova, 2022; Šoltéssová, 2016). Our findings suggest that recipients of memes indeed possess such interpretive competence. Moreover, the wide dissemination of memes reveals that content creation and influence are no longer confined to elite circles (Maniyamkott, 2017).

Another revealing observation concerns the political critique embedded in the researched memes. Approximately 26.4% of them explicitly express dissatisfaction with prevailing political conditions – corruption, nepotism, and morally ambiguous conduct by those in power. While this figure may appear modest, it gains importance when contrasted with earlier periods, in which memes rarely responded to such issues. The emergence of political criticism in memes may signal a broader reduction in public tolerance for immoral behaviour, which would be a welcome trend and warrants further study.

Finally, in the theoretical section, we examined three dominant humour theories, each treating humour as integral to societal dynamics. Our findings confirm that memes incorporate aspects of all three theories, supporting their classification as a genre of digital humour (Andreanský, n.d.). Notably, the third theory positions memes as a modern continuation of folk humour, and our data supports this.

Overall, this discussion underscores the growing significance of memes as cultural and communicative tools (Maniyamkott, 2017; Schiffman, 2014). Bridging digital culture and social narrative, memes not only entertain but also influence collective interpretations and public discourse (Ivanova, 2022). They reflect – and potentially shape – how society processes events, critiques power, and constructs shared meaning in the digital age (Ivanova, 2022; Rončáková & Sámelová, 2023).

CONCLUSIONS

In conclusion, the primary objectives of this study – to identify narratives surrounding Marián Kočner in memes and to analyse the sentiments expressed by meme creators – have been successfully achieved. The results, presented in the preceding sections, were obtained through a comprehensive content analysis that combined qualitative and quantitative approaches. The research sample included the most widely circulated memes during the analysed period. These memes reflect the attitudes of their creators and also resonate with a significant portion of Slovak society. By sharing and endorsing specific memes, this segment communicates its collective mood and contributes to the viral spread of the messages. In this sense, memes function as a form of media communication, offering insight into societal dynamics, public emotions, and the changing landscape of digital culture (Ivanova, 2022; Maniyamkott, 2017; Rončáková & Sámelová, 2023).

The study enabled a deeper understanding of how memes operate as a distinct genre within the digital environment. Although anchored in specific themes and individuals, the findings go beyond individual cases, allowing for broader insights into the characteristics of memes as autonomous forms of online expression. Thus, the research findings, while centred on Marián Kočner, contribute to a broader understanding of how memes function within digital culture, illustrating their role in shaping public discourse, influencing societal perceptions, and reflecting collective emotions. We believe this broader perspective aligns with the study's primary aim to explore the narratives in memes and their sentiments, offering insights that are relevant beyond the specific case studied.

The theoretical framework was grounded in three classic humour theories – superiority, relief, and incongruity – each conceptualising humour as a fundamental element of social life and social interaction (Andreanský, n.d.; Bergson, 1900; Freud, 1905). Our research findings confirmed that memes can integrate elements of all three theories, thereby reinforcing their role as a relatively new yet established genre of digital humour.

Achieving the study's objectives has led us to consider memes as effective tools for representing and amplifying elements of reality. A meme – composed of visual imagery, text, or auditory elements – functions as a sign system that gains meaning by referencing and mimicking real-world situations (Dawkins, 1976; Rusnák, 2013).

Another notable outcome of the research is the identification of traits that position memes among emerging genres of digital production (Rusnák, 2013; Schiffman, 2014). Many analysed memes operate simultaneously on linguistic and emotional levels. The digital and often anonymous space allows for heightened emotional expression, which in turn reveals elements of folk creativity within meme culture. In this context, the combination of emotional resonance and grassroots expression emerges as a defining feature of internet memes and postmodern digital culture (Ivanova, 2022; Piantavinha, 2022; Šoltésová, 2016).

From a linguistic and stylistic perspective, memes frequently employ elements of colloquial Slovak. Meme creators draw on expressive resources from across the entire lexical spectrum, including pejorative and vulgar expressions. These enhance the emotional tone of the message and reflect the broader vulgarisation present in contemporary public discourse.

In summary, memes can be understood as modified representations of reality (Rusnák, 2013) and as popular responses to societal events (Ivanova, 2022; Maniyamkott, 2017). While often exaggerated, their symbolic elements typically refer clearly to real-world contexts. Through humour, simplification, and the strategic use of language and imagery, memes reflect how their creators – who are part of society – perceive, interpret, and emotionally respond to the world around them. Within this context, this study, while focused on Marián Kočner, offers valuable insights that extend to broader digital culture studies, emphasizing the significance of memes in shaping public discourse and influencing societal perceptions.

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MEMI KAO ODRAZ KULTURE: STUDIJA SLUČAJA DUHOVITIH PRIKAZA MARIÁNA KOČNERA I NJIHOVO DRUŠTVENO ZNAČENJE

Hedviga Tkáčová :: Petra Polievková

SAŽETAK Ova studija ispituje kako internetski memi funkcioniraju kao odraz javnog mnijenja i digitalne kulture. Rad se fokusira na humoristične prikaze Mariána Kočnera, slovačkoga poslovnog čovjeka zatvorenog zbog financijskih zločina, kojeg se sumnjiči da je organizirao ubojstvo istraživačkog novinara i njegove zaručnice. Široko poznat slovačkoj javnosti, Kočner je postao česta meta online satire. Koristeći analizu sadržaja, istraživanje identificira ključne narative i emocije koji se prenose u popularnim memima. Oslanjajući se na klasične teorije humora – teoriju superiornosti, rasterećenja i nedosljednosti – studija pokazuje kako memovi djeluju i kao oblik zabave i kao sredstvo društvenog komentara, emocionalnog izražavanja i kritike “odozdo”.

KLJUČNE RIJEČI

MARIÁN KOČNER, MEM KAO NOVI ŽANR, HUMOR, NARODNA KREATIVNOST, DIGITALNA KULTURA

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ERASMUS STUDENTS' EXPERIENCE WITH INTERCULTURAL COMMUNICATION

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ABSTRACT *Intercultural communicative competence (ICC) has become one of the most important competences in today's world that is becoming increasingly intertwined at all levels and in all its segments. Within the educational system, the ICC is recognized as a key competence. In the theoretical part of the paper, ICC models are examined with the aim to identify variables that contribute to its strengthening. Bennett's Developmental Model served as a basis for this research. This study aims at getting insight into Erasmus students' experiences with intercultural communication. A qualitative methodology was employed, and data were analysed using thematic analysis. The results show that all respondents, through the Erasmus programme experience, enhanced their knowledge, skills and awareness related to intercultural communication. Important competences identified for intercultural communication include skills of efficient nonverbal communication, active listening, question-asking, participation in common activities, use of technology and humour. The results of this research show that Erasmus experience helps develop ICC skills, awareness of one's own culture, self-confidence and life skills.*

KEYWORDS

ERASMUS, STUDENTS, INTERCULTURAL COMMUNICATION, RESEARCH, COMPETENCES

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INTRODUCTION

Erasmus+ is the EU's programme whose aim is to support education, training, youth and sport in Europe. It proved to be one of the best programmes ever launched in the EU. Between 2014 and 2021 over 13 million people took part in this programme¹. It was originally established in 1987 under the name "Erasmus" with a view to promoting closer collaboration between universities and higher education institutions (HEIs) across Europe. Its first objective was to set up an organised system of cross-border student exchange. Over time, the programme has expanded even beyond Europe. It covers a broad framework for transnational cooperation and mobility in the education sector. The name "Erasmus" pays homage to Erasmus of Rotterdam, the leading scholar and an inspiring lecturer from the 16th century, known to have travelled extensively across Europe to teach and study at a number of universities.² The programme's objective is pursued through three key actions: Key Action 1, as the first step in the programme, refers to learning mobility of individuals (students and staff); Key Action 2 covers cooperation among organisations and institutions, whereas Key Action 3 supports policy development and cooperation. Other activities include Jean Monnet Actions, which support teaching, learning, research and debates on European integration matters, such as the ones regarding the EU's future challenges and opportunities. The University of Mostar has been part of the programme since 2009.

The Erasmus programme provides students with valuable opportunities to develop and strengthen intercultural communication competence in the framework of higher education. According to Byram (1997) (as cited in Boye and Byram, 2017), critical cultural awareness is a fundamental element of ICC. Intercultural competence consists of three components (knowledge, skills and attitudes) and is supplemented by five values: (1) intercultural attitudes, (2) knowledge, (3) skills of interpreting and relating, (4) skills of discovery and interaction, and (5) critical cultural awareness. Byram summarizes intercultural competence in English language teaching (ELT) as *savoir-être* (attitudes), *savoir* (knowledge), *savoir-comprendre* (skills to interpret and relate), *savoir-s'engager* (critical cultural awareness) and *savoir-faire* (ability to interact and discover). A close connection between language awareness and intercultural communicative competence should be viewed within the relationship between language and culture. Therefore, 'awareness of language' and 'awareness of culture' are at the same time different and similar. The fact is that members of transnational groups bring also their own language into intercultural interactions and need to be able to communicate despite differences (Byram & Golubeva, 2020). Erasmus students thus face numerous linguistic, cultural, social and psychological challenges, when abroad, i.e., in a foreign culture.

According to Spitzberg and Changnon (2009), communication competences in an intercultural context can be divided into the following models: compositional, co-orientational, developmental, adaptational, and causal process. These categories are complementary, not mutually exclusive. Howard-Hamilton et al. (1998), Ting-Toomey and

¹ <https://erasmus-plus.ec.europa.eu/about-erasmus/history-funding-and-future>. Retrieved on 19/2/2024.

² At the same time, the word "Erasmus" also serves as the acronym for The European Community Action Scheme for Mobility of University Students.

Kurogi (1998), and Deardorff (2006) are the founding fathers of the compositional models that emphasise the development of knowledge, attitudes and skills. In Howard-Hamilton's model it is expected that an intercultural competent person can, in an interaction with persons from another culture, assess the group according to its homogeneity, equality, ethnocentricity, discrimination, and risk factors. Ting-Toomey and Kurogi's (1998) model stems from the area of management and intercultural communicative competence. Therefore, it does not emphasise motivational factors and outcomes as much as it emphasises cognitive and behavioural ones. Deardorff (2006) sums up her understanding of the construct in two models of intercultural competence. The first one is pyramidal, where lower-level competences influence higher-level competences in a way that they support them, while the second model is a developmental model. The pyramidal model represents elements of motivation, cognition and skills that are parts of context within these competencies. Compositional models identify hypothetical components of the competence without the elaboration of the relations between these components. Such models represent lists of relevant or possible features, characteristics and skills that should be efficient in a competent intercultural interaction. Co-orientational models put emphasis on communication. Most frequently we refer to Fantini's (1995) *Intercultural Interlocutor Competence Model* and Byram's (1997) *Intercultural Competence Model*. Co-orientational models are the ones that are primarily dedicated to the conceptualisation of interactional achievement of intercultural understanding or any of its variants (for example, perceptive accuracy, empathy, perspective, clarity, overlapping of the meaning system). Such models can share many characteristics with other models, but they are focused on a specific criterion of communicative mutual relationship and common meanings. Developmental models describe developmental phases of acquiring intercultural competence and sensitivity. Such models can possess dimensions of other models, but primarily they place emphasis on the process, i.e., the level of intercultural competence maturity that is to be gained slowly and over time. The most prominent is Benett's (1993) *Developmental Model of Intercultural Sensitivity (DMIS)*. Developmental models have a dominant role in the time dimension of the intercultural interaction. Benett's developmental model of intercultural sensitivity will serve as a theoretical background for this research. Adaptational models strive to emphasise, as a highly significant competence, the process of adaptation. They put emphasis on interdependence of many interactions shaping the process of mutual adaptation, which is fundamental in the process of acquiring competence. A good example of such model is Berry's (1989) *Attitude Acculturation Model*, according to which acculturation combined with simultaneous process of maintaining the values of one's own culture frequently causes anxiety. Adaptational models have two specific characteristics: 1) they usually presuppose more interactions in the process, and 2) they emphasise interdependence of these interactions in modelling the processes of mutual adaptation. Multiple interactors can be modelled as a conceptual image of the other, whereas the adaptation process can presuppose representation or inclusion of any number of various outcomes. Emphasis is laid on the fact that competence reflects in mutual exchange of action, attitudes and understanding based on the interaction with the members of another culture. Therefore, adaptation is to be taken as a criterion for competence. Causal models reflect real and specific relations between the dimensions. The most well-known causal model is Arasaratnam's (2006) *Model of Intercultural Communicative Competence*.

According to this model, empathy directly influences competence, and during interaction it influences also attitudes towards intercultural and interactional experience. Causal model processes reflect rather determined componential relations. For sure, there are also alternative typological systems that could be efficiently applied. However, this classification provides a meaningful framework for differentiating between models.

RESEARCH QUESTIONS AND METHODOLOGY

This paper aims at getting an insight into the experience of Erasmus students with intercultural competence. The research is guided by the following questions:

1. What is students' foreknowledge of intercultural competence before participating in the Erasmus programme abroad?
2. How aware are students of their emotions and flexibility in intercultural communication?
3. What is the the Erasmus programme's contribution to the development of intercultural communicative competence?

Data were analyzed using thematic analysis, a method that provides insight into participants' experiences and subjective realities. It involves six steps: getting acquainted with the data; starting codes development; searching for the topics; checking the recognized topics; setting and naming the topics and, finally, writing a report (Braun & Clarke, 2006). A semi-structured interview was used. It consisted of ten questions addressing students' foreknowledge of intercultural communication, communication skills and factors of successful communication that contributed to intercultural communication during their Erasmus stay, and their awareness and self-assessment of intercultural communicative competence after the Erasmus experience abroad. At the end of the interview, students were invited to offer recommendations for improving the Erasmus programme.

Participants

The participants in this research were students of the Faculty of Humanities and Social Sciences at the University of Mostar who had spent at least one semester abroad through the Erasmus programme during the academic year 2022/2023. The sampling method, through which we reached the students, is the non-probability method of deliberate sampling (Milas, 2009). The technique used for choosing the respondents was critical case technique. Eligibility required participants to have completed a minimum of one semester abroad attending an Erasmus student exchange programme. The reaseach included nine participants—eight female students and one male student—with an average age of 22 years (ranging from 21 and 23). The participants were mostly students of foreign languages (English, Italian, and German), as well as one student from the Department of Public Relations. Eight students participated in the student exchange programme for the first time, whereas one participant had participated in two different exchange programmes in different countries.

Procedure

The participants were contacted via e-mail by the Erasmus coordinator from the Office for International Relations of the Faculty of Humanities and Social Sciences, University of Mostar. The participants got basic information about the research in this e-mail and were asked to participate. Out of 15 invited students, nine students agreed to take part. All interviews were held in person in the office of the researcher at the Faculty. The interviews were recorded by an audio recorder application on the mobile phone. All participants gave consent to be audio-recorded. The interviews lasted for approximately 40 minutes. During the interview one researcher was leading the interview while the other was in the role of an observer and was making notes according to previously prepared protocol (taking notes about characteristics of the participant, the interviewer and the context). The third member of the research team, who was already known by students, was not included in the interviewing process because it could influence the respondents, thus compromising objectivity. After each interview, the research team identified significant qualitative answers and made notes on these insights.

Ethical aspects of the research

During the whole procedure, ethical aspects of the research were taken into consideration. First, the participants were asked to participate in the research and informed consent to participate in the research was given. They gave consent in a written form, via e-mail message, and orally, before the interview and before recording it. The participants were acquainted with the purpose of the interview. They were told that the data would be used solely for the group-level analysis for the purpose of writing a research paper. The participants were informed that their participation is voluntary and that they could withdraw at any time. The aspect of confidentiality was emphasised, and the participants were made aware of the fact that, in accordance with the privacy protection aspect, neither their names nor surnames, nor personal data would be published. It would not be possible to discover their identity. They were told that their answers would be transcribed and assigned participants' tag numbers and marks, i.e., without their personal names. Finally, the participants were acquainted with the fact that they had the right to have insight into the results of the research and that the paper, once finished, would be sent to them by e-mail.

RESULTS AND DISCUSSION

After having asked the research questions: "What is students' foreknowledge of the students about intercultural competence, before they go abroad to participating in the Erasmus programme abroad?"; "How aware are students of their emotions and flexibility in intercultural communication?"; and "What is the the Erasmus programme's contribution to the development of intercultural communicative competence?", the following results were obtained, as demonstrated in Table 1.

Table 1. Overview of Topics and Codes

TOPICS	CODES
<i>Knowledge of intercultural communication prior to Erasmus</i>	Knowledge of communication Knowledge of different cultures Language skills Self-confidence
<i>Emotions and behaviours in intercultural communication</i>	First-contact fear, culture shock Being confused, cautious and at a distance Support from peers Increased openness and relaxation after some time
<i>Use of intercultural skills during the stay abroad</i>	Nonverbal communication Active listening Asking questions Use of translation tools Joint activities Humour
<i>Self-perception and awareness of intercultural communicative competence after the stay abroad</i>	Broader knowledge of other cultures Better understanding of the situational aspects of communication Stereotype checking Better insight into one's own culture Enhanced efficiency in intercultural communication (observation, empathy, flexibility) Self-confidence Acquisition of life skills

The research results show that students reported possessing language skills and some knowledge of intercultural communication prior to their exchange experience. Participants view this kind of knowledge as necessary for this kind of experience, primarily language skills: "... I am acquainted with the English language, I know the phrases, some colloquial expressions etc. (2); "... I have quite a good level of English language knowledge, so that I did not have fear of the language" (5); "I study English language, I can speak English very well"(7). Regarding knowledge of intercultural communication, the participants reported the following: "For me it is a conversation, exchange of experience, meeting people from different cultures" (1); "I believe that for this kind of communication one needs to understand someone's needs, traditions, religions, food and so on, some habits" (6), "... like a connection of people from different cultures, different environments, attitudes, conceptions, everything actually" (8); "... differences in cultures. We can speak the very same language and still do not understand each other. We do not categorize some things and concepts into the same categories, totally different" (9). Participants emphasised that they were self-confident and open even before going abroad for a student exchange: "... I really do not like being in a shell, in my comfort zone, I like going out of the comfort

zone and that includes, normally, travelling, Erasmus and meeting new people, cultures, their traditions." (6); "... Well, I am a pretty liberal person. I really do not know what could surprise me. When I came there, I saw a lot of stuff, and I was not afraid at all." (5)

To the question "What is intercultural communication?", the respondents gave the answers that align with theoretical definitions. Intercultural competence is a complex of abilities needed for an effective and adequate communication with the others who linguistically and culturally differ from us (Fantini, 2009). Intercultural communicative competence is considered to be "impression management that allows members of different cultural systems to be aware of their cultural identity and cultural differences, and to interact effectively and appropriately with each other in diverse contexts by agreeing on the meaning of diverse symbol systems with the result of mutually satisfying relationships" Kupka, 2008 according to Deardorff, 2009, p. 18).

Quantitative research conducted among social workers about their communication with clients from different cultures (Begić, 2019) speaks about significant contribution of self-efficiency and self-confidence to efficient intercultural communication. Furthermore, considering intercultural knowledge, attending workshops, seminars, courses and conferences showed a significant predictive value for acquiring intercultural competencies. Earlier research confirms that intercultural competence is also influenced by at least minimal attending of intercultural education (Green et al., 2005). Intercultural education and knowledge influence individuals involved as well as people with whom they have interaction (Diaz-Lazaro & Cohen, 2001). According to Anderson et al. (2006), it has been confirmed that the participants of a study programme abroad raise their knowledge regarding adaptation to other cultures and lower their favouritism. A minimum level of exposure to intercultural education influences and strengthens competences, which is in accordance with the compositional theoretical models of intercultural communicative competence. These models place emphasis on the development of knowledge, attitudes and skills, as well as on achieving cognitive and behavioural outcomes (Deardorff, 2006; Howard-Hamilton et al., 1998; Ting-Toomey & Kurogi, 1998;).

Asked about awareness of their own emotions and flexibility in intercultural communication, respondents reported experiencing a variety of emotions and behaviours upon arrival in the host country: "It is a little bit confusing and frustrating" (1); "... confusion, because it was the first time I went to a foreign language country where I did not speak the language ... a little bit of fear too" (3); "For me, it was the first time I went away from home, so I was a little bit scared, a little bit frightened" (5); "I was a bit scared because I did not know those people well and I lived with them. The dormitory did not have a security. I lived on the second floor with people I could not understand at all, people from some other cultures" (9).

It is interesting to point out the answers about language barriers and culture shock: "... somebody would approach us and ask if we spoke Spanish and we would say 'No', and they would give up, stop the communication with us. We were very sorry about that" (1);

"... for sure there were some language barriers, they could not express themselves well, not like in their mother tongue, and I also had some smaller difficulties in communication" (2); "In the bank there was only one person who spoke English and they had a very strong Spanish accent in English, but we did manage to understand each other" (5); "... as far as my German is concerned, I had to struggle, but I did not leave my country with a good knowledge of German. In everyday life, I asked for communication to be in English. When I arrived there, I can say that I immediately felt what that culture shock means, from the first hand. The behaviour of people, different weather, norms with, for example, older people, how people behaved, how they go to university, how much more relaxed they are, you could tell that I was in Spain" (6).

Respondents said that at the very beginning of their stay abroad they sought their own group support: "It was a bit of a shock at the beginning. For example, at the airport, as soon as we landed, the workers at the airport did not speak English, and one would suppose that they should know it. But my colleague and I study Italian, and Italian and Spanish are a bit similar, so we could get by somehow" (1); "Hanging out with people from the same culture was very much pronounced in our case. We were four, first. Four of us stuck together. We needed quite a long time, almost a month we sought our people. In the dormitory there were a lot of people from the Balkans, and we would always approach them, we tried to hang out with them" (8); "I must admit that first few meetings were with people who were in Graz, but they were from the Balkans" (9).

Among mechanisms that explain fear and insecurity in communication with others, there are ethnocentrism, stereotypes and prejudice (Kavačić, 2000). Additionally, there are psychological barriers like anxiety, stress, supposing that something is similar, wrong explanation of the nonverbal communication and differences in language. In order to explain what happens in communication with people from a different cultural background, Gudykunst and Kim (2002) developed a theory of anxiety and insecurity. They claim that if the differences between the cultures are large, anxiety and insecurity will increase. Prior to this research, McCroskey (1977) claimed that there were three general settings of behavioural reactions: avoiding communication, drawing back from communication and exaggerated communication.

Respondents reported that they noticed openness and relaxation in intercultural communication after some time spent abroad: "As time was passing by, it was easier. We got used to the situation. But, you see, in those first encounters, we were all flabbergasted" (1); "... For the first 45 days, people stuck just to their people. I would say that after two or three weeks everything was more relaxed. I did not experience that somebody was closed or shy. All those people who came there were extremely open, ready to learn about my country and accept some things" (5); "While I was getting to know them, they were indeed a group where I found myself, we did not close inside ourselves, neither in terms of emotions, nor communication, so that we were open ... I felt that somehow, I naturally got relaxed in the new surrounding. It was a kind of quick" (7); "... Quite a number of them had been studying for a longer period there and they had changed the countries and they got used to it. They were a bit more open. We needed a bit more time to get relaxed. It

could be because of other cultures and new surrounding and you are for the first time in a new city. Later, we also got relaxed and we were at the same level, only a bit less at the beginning" (8).

Developmental models claim that intercultural communicative competence develops over time individually, relationally or both. They try to identify developmental phases that determine the levels of communicative competence in interaction. Over time, the interactivity progresses from relatively ethnocentric understanding of other cultures into a more ethnorelative understanding and accepting. The dimension of development is also emphasised in Benett's model of intercultural sensitivity from 1986. It goes from the monocultural worldview to the intercultural worldview. Another highly influential developmental model of intercultural communicative competence goes from the concept of culture shock towards the model of gradual adjustment and satisfaction.

One of the topics for overcoming intercultural communication misunderstandings was communication skills. Intercultural communicative competence generally presupposes adequacy and success in behaviour. In accordance to that, Kim (cf. Kim, 1991 as cited in Samovar et al., 2013, p. 324) defines it as a general inner ability of an individual to manage key challenges of intercultural communication, such as cultural differences, inter-group attitudes and stress that follows such a situation. In this context, the research focused on the analysis of the level of cognitive and behavioural skills of the respondents, how they are able to analyse situational aspects of communication and choose adequate manners of behaviour. For this purpose, the participants were asked the following question: "Which communication skills did you use in order to be more efficient in intercultural interaction?".

According to the collected answers, respondents view efficient management of nonverbal behaviours as an important communication skill within intercultural communication, especially in the first phases of adaptation to the new surrounding and culture. "I had to use nonverbal communication. I had to explain a bit to the people, show with my hands what I needed, wave my head and explain with my hands" (1); "At the beginning I used a lot of nonverbal communication, but I do not think I did it consciously, it popped up spontaneously" (4). Although nonverbal communication can serve as an efficient means of better understanding and as an addition to verbal expressions during intercultural communication, it is highly important to develop awareness of various behavioural repertoires within cultural patterns and the ability to interpret them correctly. As Lustig and Koester emphasise (2013), the majority of nonverbal communication forms is to be interpreted within the culture in which they are applied. According to these authors, there are three basic manners that differentiate cultures in their nonverbal behaviours: a specific repertoire of behaviour that are applied (movements, body position, gestures...), the rules of showing nonverbal expressions (needs, adequacy, distance...) and interpretation or meanings that are ascribed to certain nonverbal behaviours.

Mastering nonverbal communication in intercultural context requires knowledge of cultural patterns, awareness of differences and the ability to adapt the style of nonverbal expression to the interlocutor and the context. This dimension presupposes the ability

of active listening and right interpretation of the feedback. Therefore, it is important to say that respondents reported about active listening and asking questions as relevant skills during their Erasmus stay abroad. The importance of active listening with integrated questions is evident from the answers of one participant: "Asking questions, open attitude, showing that I am indeed interested. If someone is talking about something, I will not only passively listen (...) Being interested, I communicate in a way that I connect it with something of my own, for example, I can say 'Yes, I also did it once'. Some comments, so that it does not seem as if I only listened and did a bunk" (5).

One of the basic functions of the skill of active listening is comprehension check. Active listening helps us check what the interlocutor said and meant. By reflecting interpreted meanings, the interlocutor realises that you are included in the conversation and they are offered a chance to explain. Next to paraphrasing and expressing understanding, asking questions is one of the primary techniques of active listening. By asking questions, we strengthen our personal understanding of the content and stimulate the interlocutor to give feedback in order to elaborate their thoughts and feelings (DeVito, 2013).

Research shows that interaction and making friends with members of the culture in which you find yourself influences the feeling of satisfaction and helps overcome the culture shock. In this context it is highly important to emphasise the importance of active participation in social activities, cultural and religious events. By increasing direct contact, the process of adaptation gets easier. The respondents' answers supported this. They reported that joint activities with members of other cultures significantly helped them in the adaptation process. It is interesting to mention that during joint activities they used humour as a universal means of connecting and overcoming misunderstandings, no matter what the cultural background was: "... We used a lot of humour, I do not know if it belongs to a type of communication. Especially via social networks and videos that spread. That was usually a center for us, if we hang out with somebody and if something goes wrong in communication, we use these things to refresh communication a bit. It gets us closer somehow, then we talk about some funny things, but we know that tomorrow we will be able to talk about more serious things because we got closer" (4). In this context, it is important to emphasise the importance of technology. Specifically, respondents used translating tools like Google translate for translation and similar platforms for watching and distributing videos and sitcoms, which resulted in lowering the feeling of unease and tension in communication.

When it comes to the research question "What is the Erasmus programme's contribution to the development of intercultural communicative competence?", respondents reported a larger knowledge about other cultures generated by this experience. Furthermore, this experience helped them better analyse the situational aspects of communication. "I believe that I got pretty large knowledge by doing this, that I otherwise wouldn't get from a book or from the Internet. The first personal contact in that country where there was a lot of various cultures, people, norms, from Spaniards to Germans. I can say that I got back home full of knowledge" (1). From the results one can read about the perceived importance of the stay at Erasmus for a better insight into the particularities of one's own

culture and checking the stereotypes about the others. "Let's say, I have always heard the stereotype that Germans are punctual. That is not the case at all. Everything is late: trains, buses, services, teachers. It is just not like that" (2); "After I got back, I engaged myself more in working actively to broaden my knowledge of my culture, to talk about things that are important to me" (3); "That helped a lot. They made me understand the way we in Mostar think, especially the young. They did not give us feedback, but we could realise that just from their behaviour" (4).

Such answers can be connected with increased self-assessment in communication, since the results show that larger interaction with the other students enabled an introspection into one's own culture, one's own attitudes and reactions in intercultural communication.

When it comes to flexibility in intercultural communication, Samovar, Porter and McDaniel (2013) emphasise the ability to accept unclarities as an integral part of the skill. Furthermore, they claim that the ability to accept unclarities is one of the key elements of intercultural ability. Flexibility is a key communicative skill that enables the speaker to successfully overcome conversational deviations (verbal/nonverbal) that appear in intercultural communication. In order to get a clear insight into the level of flexibility after the Erasmus stay abroad, participants were asked to answer the following question: "If you had a chance to stay abroad again, how would you participate in intercultural communication?". The results show that most respondents believe that they possess a satisfactory level of flexibility in intercultural communication. The following answers were prominent: "The only thing that I would recommend to people who go abroad is that they have to accept both their norms of behaviour and their distance when talking and the way to talk with them, both in relaxed and in serious situations. For me, it was very important to wait and to see how they behave and then to adjust to them. So that the others wouldn't be embarrassed and to make my experience easier" (1); "I believe that I would be definitely more ready and more familiar with some things than I was before this Erasmus experience" (2); "This experience has completely changed everything, also the conclusions that I make, and the way I think and the choices, so that I do not know what to say except that I am more open towards everything and I confront things more freely" (5); "I would probably explain others' behaviour in a more open manner. In the sense that I would not take things for granted. I wouldn't mind some things. People are not aware how some cultures are different" (8).

With a view to gaining insight into respondents' perception of the level of intercultural communicative competence after the Erasmus stay, they were asked the following question "How would you assess your own intercultural competence?". Their answers show that they believe that their Erasmus experience helped them master intercultural communication and to get new life skills, which consequently enhanced their self-confidence. "It made me better in all aspects, I had a different approach. (...) The teachers really cared to show us, to make it easier for us, that experience was excellent to me. That led me, and gave me more self-confidence through those motivational messages, to come here and continue the path. Additionally, let's say, privately or in communication with the

colleagues, I am also more open" (3); "In my nature, I was a kind of closed, introverted person. That has changed, for sure. That inhibited me a bit at the beginning. Now I would be much more relaxed regarding other cultures at least" (8). Enlarged self-confidence correlates with enlarged understanding of other cultures and the adjustment process that enables a successful functioning in foreign surroundings. It is interesting that a satisfaction was detected among participants because of the acquired competencies that lowered the insecurity level due to their experience of living in foreign surroundings. "I think I am more open for meeting new people and new chances. Now I am ready, if there is a need to go somewhere, I can go by myself and adapt" (7).

OBSERVATIONS BY THE RESEARCHERS

All participants were very open and all of them expressed positive emotions about their participation in the research. The research gave them an opportunity to evoke nice memories and share their positive experiences. For two participants, this was the first time to speak about emotions they had during Erasmus, and they shed tears while answering the questions. They were motivated to suggest also other students to participate in the research. An impression was gained that for the majority of them the research interview evoked pleasant feelings and had a therapeutical effect. There were neither negative reactions nor resistance. On the contrary, participants spent most time answering the questions about emotions during their stay abroad.

The interviewer was a researcher experienced in conducting qualitative interviews, and possessed therapeutical experience. A pleasant and relaxed atmosphere was created through the use of informal empathetic questioning and active listening. The researcher gave clear instructions, confirmed participants' willingness to take part, and obtained consent to be recorded. Participants were also reminded of their right to withdraw at any time. Respect for emotional expression was shown throughout, and no participant was rushed in providing responses.

The research context was the same for all the participants, space and time in the researcher's office were set, so that neither other students nor telephone calls could interrupt the process. The faculty space was familiar to students from earlier as well as the Erasmus programme coordinator who invited them to the interview.

Limitations and contributions of the research

One concern involves potential subjectivity in interpreting participants' responses. There is also possible influence of respondents on other respondents since they knew each other prior to the interviews. Furthermore, the researcher may have influenced the research materials as students' answers to questions about emotions had to be shortened. Only one researcher was experienced in qualitative research. Another limitation is the scarcity of prior research and literature on intercultural communicative competence, especially in the native language.

The contribution of the research is in the fact that valuable insights into students' intercultural communicative competence were gained. The findings offer practical recommendations for promoting Erasmus among the general student population, expanding the diversity of programming for incoming students, and implementing preparatory trainings and seminars to support outgoing participants. The study also underscores the need to develop capacities of local students, faculty and university staff as well as activities for incoming students through continuous education in intercultural communication.

CONCLUSION

Before going to Erasmus, it is necessary to possess a good foreknowledge of the language and culture of the host country. In addition to regular factors of successful communication, openness and flexibility emerged as important factors in intercultural communication. During their exposure to intercultural communication, some students experience initial fear and culture shock, which changes into curiosity and fun as time passes by. Because they were insecure and closed at the beginning, a feeling of regret for the lost time was expressed during interviews. Respondents view efficient nonverbal behaviours management as a significant communication skill, especially in the early phases of adaptation to new surroundings and culture. The majority of students reported that during Erasmus they questioned their own prejudices and stereotypes. They became aware of the values of their own culture. The competences that they gained through the Erasmus programme included: improved language proficiency, increased self-confidence, acquiring life skills of living alone independently and organizing one's own life, enhanced maturity, breaking down prejudice, higher awareness about one's own culture, valuing other cultures. These are the reasons why all participants expressed willingness to repeat the experience of student exchange. Several specific qualitative findings emerged. Humour was reported as an effective tool for overcoming intercultural misunderstandings in communication. Participants also used digital technologies for translation and or watching videos and sitcoms, which resulted in lowering unease and stress in communication. Another interesting outcome is awareness of the importance and connection of intercultural communication with acquiring new life skills, such as: travelling abroad, opening a bank account abroad, searching for a flat, taking care of food, attending classes at a foreign university, as well as building personal and professional networks. The research results show that the Erasmus experience helps in mastering intercultural communicative competence skills. It can be summed up that all participants reported benefits from their Erasmus experience, particularly in terms of their knowledge, skills and awareness of intercultural communicative competence.

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INTERKULTURNA KOMUNIKACIJA STUDENATA NA ERASMUSU

Marijan Primorac :: Anita Begić :: Ivana Grbavac

SAŽETAK *Interkulturalna komunikacijska kompetencija postala je jednom od najznačajnijih kompetencija u suvremenom svijetu. U obrazovnom sustavu ta je kompetencija prepoznata kao ključna razvojna kompetencija. U teorijskom dijelu rada donosi se pregled modela interkulture komunikacijske kompetencije s ciljem identificiranja varijabli koje pridonose poboljšanju interkulture komunikacijske kompetencije. Relevantni teorijski model koji je poslužio kao podloga istraživanju jest Benettov razvojni model. Cilj rada bio je dobiti uvid u iskustvo studenata koji su pohađali program Erasmus s interkulturalnom komunikacijom. U istraživanju je primijenjena kvalitativna metoda, a za obradu podataka korištena je tematska analiza. Rezultati istraživanja pokazuju da su svi ispitanici, zahvaljujući sudjelovanju na Erasmusu, profitirali u području znanja, vještina i svijesti o interkulturalnoj komunikaciji. Kao bitne kompetencije za učinkovitiju interkulturalnu komunikaciju izdvajaju se vještine učinkovite neverbalne komunikacije, aktivnog slušanja, postavljanja pitanja, sudjelovanja u zajedničkim aktivnostima, uporaba tehnologije i humora. Rezultati istraživanja ukazuju da iskustvo boravka na programu Erasmus pomaže pri razvoju vještina interkulture komunikacijske kompetencije, svijesti o vlastitoj kulturi, samopouzdanja i životnih vještina.*

KLJUČNE RIJEČI

ERASMUS, STUDENTI, INTERKULTURNA KOMUNIKACIJA, ISTRAŽIVANJE, KOMPETENCIJE

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PRIKAZI KNJIGA

BOOK REVIEWS

Eric B. Shiraev, Jennifer Keohane, Martijn Icks, Sergei A. Samoilenko

CHARACTER ASSASSINATION AND REPUTATION MANAGEMENT:

Theory and Applications

New York and London: Routledge, 2021

ISBN 9781138609181, 280 Pages

E. B. Shiraev, J. Keohane, M. Icks, and S. Samoilenko have produced an impressive and timely multidisciplinary, cross-cultural study on character assassination and its intersection with reputation management. Structured as a textbook and spanning fourteen chapters, the volume offers a comprehensive examination of character assassination, one of the most pressing reputational challenges in the contemporary media environment. Each chapter is systematically organized, beginning with learning objectives and incorporating various visual and analytical tools, including images, graphs, tables, and notable case studies for discussion. Each chapter concludes with a concise summary, critical thinking questions, a glossary of key terms, and a curated list of references.

In the introduction, the authors define character assassination as “the deliberate destruction of a person’s reputation or credibility through character attacks” (p. 10), and demonstrate its significance in politics and public life. They outline the foundational pillars of character assassination and clarify essential terminology and concepts necessary for understanding the phenomenon.

The second chapter, “Character Assassination in History,” offers a historical overview, tracing the phenomenon from ancient Egypt and Rome through the Protestant Reformation, and concluding in the 19th century with illustrated character attacks against U.S. President Abraham Lincoln.

The third chapter, “Approaches to and Methodology for Studying Character Assassination,” presents key approaches to the study of character assassination, including rhetorical and communication studies as well as sociocultural and political psychology perspectives. This chapter also discusses major research methods and provides tools for critical thinking to help overcome research bias when studying character assassination.

In the fourth chapter, “The Actors in Character Attacks,” the authors clearly define *attackers*, *targets*, and *audiences* involved in character attacks, examining the interactions among these key actors.

The fifth chapter, “Content and Types of Character Attacks,” presents various types of allegations used to attack a target’s character. The authors analyze methods such as ridiculing, disgracing, and erasing, while also considering factors such as hierarchy, timing, and complexity in distinguishing between types of attacks.

The chapter titled “Means and Venues of Character Attacks” explores the role of both legacy and social media in facilitating character attacks. The authors analyze media practices and processes such as agenda-setting, framing, labeling, and the use of memes in character attacks. The chapter concludes with a discussion of three cardinal strategies in mediated campaigns: provocation, contamination, and obliteration.

The seventh chapter, “The Impact of Character Attacks,” examines the outcomes of character attacks across domains. It explores their effectiveness and the varying degrees of character damage they can cause – mild, moderate, and profound. The chapter concludes by explaining the interconnection between character attacks and public

scandal, exploring susceptibility to character attacks and introducing the concept of “character assassination immunity” (p. 127).

The eighth chapter, “Defending Against and Managing Character Attacks,” defines core ideas of reputation management and reputation crises. It proposes a three-stage model: preparedness and prevention, image repair, and post-crisis communication. The chapter explores activities such as issues management, risk management, and inoculation strategies during the first stage. In the second stage, it addresses the management of reputational crises through *image repair theory* (highlighting its five core strategies) and *situational crisis communication theory*. The third stage is devoted to strategies for managing reputation once the crisis has subsided.

The ninth chapter, “The Culture Factor,” explores how culture influences the process of character assassination. It demonstrates how cultural norms shape perceptions of *good character* and how cultural diversity and division create fertile ground for character attacks. It also conceptualizes key cultural dichotomies and illustrates how character attacks can become a driving force behind many public scandals.

The tenth chapter, “Character Assassination in Democracies,” investigates the relationship between character assassination, information, and democracy. In contrast, the eleventh chapter, “Character Assassination in Authoritarian Regimes,” focuses on the dynamics between character assassination, information, and autocracy. It discusses authoritarian methods of character attacks, such as organized direct attacks, censorship and silencing, scapegoating, and show trials, and considers scenarios in which authoritarian leaders become targets themselves.

The twelfth chapter analyzes character assassination in international relations. The authors explain why character attacks against foreign leaders are launched domestically, showing how such actions can strengthen or weaken a government’s foreign policy goals. They examine wartime propaganda and the stereotyping of entire populations as “evil.” A distinction is drawn between attacks meant for domestic versus international audiences, with the latter including forms of false allegations, exaggerations, bogus translations, scoring, and slander (p. 207). Examples include the targeting of international figures such as George Soros and Bill Gates. The chapter also shows how character attacks—such as mocking and humiliation – launched from one country can influence public opinion in the targeted country, weakening its government. It concludes by examining attacks in self-defense and defending against attacks, emphasizing that such strategies can negatively affect not only the target but also the attacker’s own government.

The thirteenth chapter, “The Gender and Sexuality Factor,” opens by examining the case of one of history’s most famous female politicians, Margaret Thatcher, and explores how sex, gender, and sexuality can be exploited in character attacks. The authors provide numerous examples of how these aspects are weaponized to accuse individuals—ranging from claims of immorality, misconduct, or misleading the public, to allegations of promiscuity, extramarital affairs, or attempts to undermine one’s masculinity or femininity.

The final chapter, “Character Attacks in Sports, Science, and Entertainment,” examines how character assassination functions in these high-profile arenas. Using the case of singer Michael Jackson as an entry point, the authors illustrate character attacks on celebrities and compare character attacks in politics and entertainment. Similarities include the goal of defeating opponents, a broad spread of character assassination, and

the loss of endorsements. However, they point out that key differences lie in the relational level: most politicians are not idolized in the same way as celebrities, yet once celebrities enter the political sphere, they become more exposed to character attacks (p. 251). The authors note that, overall, character attacks in entertainment and sports tend to have little or no impact at all. They conclude with attacks in the scientific domain, which often focus on morality, hypocrisy, political or social affiliations, and personal motivations (p. 251). Overall, the book presents an original, methodically structured, and engaging framework for students, scholars, and professionals in communication and political science. It serves as a valuable resource across a range of fields – including politics, entertainment, business, global affairs, religion, and science. Given the inescapability of character attacks in the contemporary media environment, this volume stands as an essential reference for navigating the complexities of reputation management.

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Nico Carpentier and Jeffrey Wimmer

Democracy and Media in Europe. A Discursive-Material Approach

Routledge, 2025, 140 pages

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The book *Democracy and Media in Europe. A Discursive-Material Approach* arrives at a crucial moment – a time when both democratic systems and media in Europe are increasingly under pressure exerted by both internal and external forces. In an era marked by the rise of populism, the spread of disinformation, growing public polarization, and eroding trust in institutions, Nico Carpentier and Jeffrey Wimmer offer a theoretically grounded yet socially engaged exploration of media as a site of struggle, opportunity, and challenge for democracy. Their discursive–material approach allows for a deeper understanding of how democracy is not only enacted through laws and institutions, but also through everyday practices, technologies, infrastructures – and, crucially, through media.

The book is divided into two main sections. The first begins with a theoretical discussion of democracy, placing particular emphasis on the elements without which democracy cannot exist. The authors then focus on the political struggles that shape and contest the very concept of democracy, emphasizing that its fundamental components are not fixed, but constantly subject to negotiation. Chapter Four explores the discursive–material factors that enable democratic functioning – elements that, although formally outside democracy's boundaries, play a crucial role in its realization. Finally, special attention is paid to threats that may undermine or weaken democratic processes.

This first part leaves a strong impression due to the clarity of its theoretical elaboration and the urgent relevance of the issues it addresses. As a result, readers become acutely aware of democracy's fragility – the delicate balance between the conditions that enable it and the threats that aim to dismantle it, all while recognizing that political struggle continuously takes place within its own boundaries. This approach encourages reflection on democracy not as a completed system, but as an ongoing process – one that demands

defence, criticism and continual reconstruction from citizens. Perhaps the most important insight from this section is that, although often passive, excluded, or victims of symbolic violence and internalized injustice, citizens remain the key agents of democratic order. Furthermore, the first part offers both a comforting and sobering understanding of democracy. It shows that its imperfections, slowness, and unfulfilled promises are not signs of its demise. On the contrary, they are intrinsic to its nature. It is precisely its openness to disagreement and capacity for correction that make democracy worth preserving and fighting for. As the authors suggest, democracy urges us to ask questions – even the uncomfortable ones, even those directed at itself.

It is the media that play a key role in asking these questions, acting as a space where the tensions inherent in any democratic process are reflected and articulated. The complexity of democracy is mirrored in the media – its openness to dissent, but also its vulnerability to manipulation; its aspiration towards pluralism, but also the danger of exclusion. Media are not merely observers of political reality; they are active participants – tools of democratic expression and arenas where democracy is constantly questioned, tested, and shaped. This dual role of media as both a mirror and an agent of democratic tension creates a natural transition to the thematic focus of the book's second part.

In the second section, the authors explore the relationship between media and democracy from several perspectives. They begin by explaining the core democratic roles of the media, then analyze the internal characteristics that support and enhance democracy, while also underlining the battles fought around these roles. They further address the conditions necessary for the media to function democratically, as well as the threats that can compromise this potential. Although these topics are spread across different chapters and examined from various angles, the authors argue that such a multifaceted approach best captures the complexity of the media-democracy nexus.

This section offers equally important reflections, focusing on the media and their essential role in maintaining and shaping democracy. The media monitor power (the watchdog role), enable public debate, encourage civic participation, and help shape identities and values. While the authors acknowledge and emphasize the democratic potential of the media, they also introduce a note of pessimism. The democratic functions of media cannot be taken for granted; they are, as the authors stress, constantly contested. Media operate within a complex context shaped by political struggles over information control, freedom, pluralism, and the right to expression. They are also exposed to market pressures and technological changes that challenge the production and distribution of content. In addition, rising threats to journalists, widespread disinformation, and the polarization of public discourse further erode the media's ability to serve as mechanisms of accountability and platforms for democratic exchange.

To ensure that the democratic role of the media does not remain a mere normative ideal, certain enabling conditions must be fulfilled. These include stable resources (technical, institutional, human), a democratic media culture that promotes ethics, professionalism, and diversity of voices, and state regulation to counterbalance market dynamics and potential abuses. In a time when information spreads faster than ever and the boundaries between facts, opinions, and manipulations grow increasingly blurry, citizens' capacity to recognize, interpret, and critically engage with media content becomes crucial for

preserving democracy. For citizens to succeed in this, and for new technologies to serve democracy rather than manipulation, systematic critical media and digital literacy is essential.

In conclusion, the authors remind us that the media are mirrors of reality – they expose order through stories of disorder, injustice, conflict, and chaos, shaping public consciousness about what is considered legitimate and just. Media are indispensable for a healthy democracy; they actively contribute to defining who we are and what kind of society we want to build. To fulfil this potential, all the previously mentioned conditions must be met. Without them, media risk becoming tools of manipulation, control, and exclusion.

The book effectively integrates the analysis of democracy and media, demonstrating that these two spheres cannot be understood in isolation. A consistent argument runs through both parts: democracy and media are arenas of struggle, but also spaces of possibility. Ultimately, the authors offer cautious hope: although democratic ideals face serious challenges, the potential for further democratization remains open. It is this openness – to dissent, discussion, and transformation – that makes both democracy and the media that accompany it not only worth defending, but also worth continuously rethinking. With this in mind, the reader is not left with pessimism, but with a sense of active engagement and responsibility, since both democracy and media democracy are never finished processes, but ongoing efforts that call for continuous participation, involvement, and reflection.

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Upute suradnicima

Interdisciplinarni časopis *Medijske studije* otvara prostor za međunarodnu znanstvenu i stručnu raspravu o medijima, komunikacijama, novinarstvu i srodnim disciplinama. Na suradnju su pozvani autori čiji radovi (prilozi) ispunjavaju kriterij relevantnosti i znanstvene izvrsnosti. Radovi ne smiju biti djelomično ili u cijelosti već objavljeni, ne smiju biti u procesu objavljivanja u nekom drugom časopisu, zborniku, knjizi i sl., niti smiju biti prijevod takvih radova. Za sve navedeno autori preuzimaju odgovornost. Uvjet za objavu rada u časopisu jesu dvije anonimne, pozitivne recenzije međunarodnih stručnjaka.

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Internet references:

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UNICEF, Ured za Hrvatsku (2011, March). Mišljenja i stavovi djece i mladih u Hrvatskoj. Retrieved November 19, 2013, from <http://www.unicef.hr/upload/>

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