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EUROPEAN MEDIA ASSOCIATIONS' STATEMENT ON THE EUROPEAN DEMOCRACY SHIELD

We, the undersigned European media associations, representing broadcasting, printed and digital press and radio, view the European Democracy Shield (EUDS) as a vital and timely opportunity to address the growing threats to our essential democratic role of informing, educating, and entertaining millions of citizens every day.

For the EUDS to succeed, it must confront a harsh truth: tech platforms control the flow of information and shape public discourse, while bearing none of the responsibility that comes with that power. These have well-documented social and economic consequences¹, to the detriment of editorial media that do bear such responsibility.

The EUDS must act decisively to restore and rebalance the digital ecosystem and create fair economic conditions in which professional, editorial media can survive and grow, and quality journalism can thrive and reach audiences. Without sustainable economic environment for editorial media, professional news, investigative reporting and editorial content, Europe's information landscape will continue to deteriorate – leaving it vulnerable to malicious disinformation and foreign manipulation.

We therefore urge EU institutions to make this their priority: fix the structural imbalances choking European media. The future of democracy depends on it. We advocate for immediate action across three key domains:

1. Enforce digital rules to strengthen media and safeguard democracy

Europe already has some tools to address this crisis, but rules are only effective if they are properly and consistently enforced. The European Media Freedom Act (EMFA), the Digital Services Act (DSA), and the Digital Markets Act (DMA) provide a framework for a pluralistic and sustainable media environment. However, Big Tech players, acting as Digital Gatekeepers under the DMA and Very Large Online Platforms (VLOPs) under the DSA, are simply ignoring the rules. Their first risk assessments under the DSA, for example, brazenly disregarded their obligation to take into account media freedom and pluralism, failing to meet the law's requirements².

¹ World Economic Forum's 2025 Global Risk Report ranks disinformation as the top risk for the 2027 horizon

² Article 34(1b)

In order to protect media freedom in Europe, the EMFA must be wielded as the instrument it was designed to be, while the DMA should serve to prevent gatekeepers from abusing their dominant market position. Enforcement actions must prioritise market failures and practices that threaten the media's economic sustainability and visibility. In that regard, citizens' ability to easily find or discover a diverse media offer, trustworthy editorial information, as well as local and regional content should be further promoted.

The health of our democracies depends on the implementation of these rules and the readiness to take additional regulatory action in the digital sphere.

2. Rebalance the advertising market to sustain editorially independent media

Advertising remains the main source of revenue for editorial media, but market dynamics currently favour Big Tech companies over media organisations that invest in journalism and editorial teams, and provide guarantees such as editorial responsibility and fact-checking. Recent studies show advertising spend shifting away from media that produce quality content towards gatekeepers platforms that do not. The current advertising ecosystem significantly undervalues quality content production, with automated systems often prioritising user retention — and thus polarising and extreme content — over reliability.

The EUDS represents an opportunity to introduce or encourage mechanisms to incentivise advertisers to invest in editorial media. Ongoing initiatives across Europe – the *États Généraux de l'Information*³ in France, *Initiative 18*⁴ in Germany, and the *Österreichische Medien*⁵ initiative in Austria – show an understanding of the importance of media financial sustainability and a growing interest in incentivising advertising on editorial media.

3. Introduce Media Impact Assessments across EU policymaking

Policy made in silos creates unintended consequences. While media-specific legislation often considers its impact on the sector, policies in other areas – including but not limited to digital policy, data, and consumer protection – can inadvertently undermine media sustainability.

We therefore propose a **"Media Impact Assessment Test"** for all relevant EU initiatives. This systematic evaluation would examine how proposed legislation affects media viability, ensuring that policies designed to address other challenges do not accidentally undermine media sustainability, but instead help the sector prosper.

This is not a novel concept. It responds to repeated calls from Member States themselves⁶. Making media impact assessments a standard practice in the Commission's legislative and competitiveness processes would ensure that EU policy is coherent, future-proof and supports media sustainability and democracy.

Several initiatives that might affect media sustainability are already under discussion, making such a Media Impact Assessment both timely and essential to prevent collateral damage.

³ <https://www.vie-publique.fr/files/rapport/pdf/295405.pdf>

⁴ <https://www.initiative18.org/>

⁵ <https://www.die-oesterreichischen-medien.at/>

⁶ See Council Conclusions on safeguarding a free and pluralistic media system (2020/C 422/08) - "strengthen horizontal coherence in the regulatory framework, by explicitly and structurally taking media pluralism into account in the legislative process during the impact assessment of regulatory initiatives"