



Submission to the EU Public Consultation on the European Union's Democracy Shield

International Press Institute

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The following input is submitted by the International Press Institute, a global network of editors and journalists dedicated to media freedom and the free flow of news and information. IPI was established in 1950 on the belief that freedom of the media and quality, independent journalism helps build a better, freer, and more peaceful world.

IPI welcomes the opportunity to contribute to this consultation, and to address the urgent need to contribute to a healthy information ecosystem. Our submission – which complements IPI's position in joint submissions as part of the [European Partnership for Democracy](#) and the [Media Freedom Rapid Response \(MFRR\)](#) – focuses on the need to support independent news media as a crucial guarantor of democratic resilience and a bulwark against disinformation.

Media Freedom and the European Democracy Shield

The European Democracy Shield has identified four key priority objectives:

- Countering disinformation and foreign information manipulation and interference (FIMI).
- Ensuring fairness and integrity of elections and democratic processes and strengthening democratic frameworks and checks and balances, including free, plural and independent media and CSOs.
- Strengthening societal resilience and preparedness, including digital and media literacy, critical thinking, etc.
- Fostering citizens' participation and engagement.

IPI's view is that media freedom and independent journalism should be treated not as one separate element of the Democracy Shield but as a cross-cutting foundation that underpins the protection and promotion of all other elements, thereby strengthening the EU's democratic processes and democratic resilience as a whole.

A free, vibrant, and pluralistic media landscape is a sine qua non to protecting democracy and combating disinformation.

Yet this role is under pressure on multiple fronts. **On the one hand, threats to press freedom across Europe are growing**, including through legal harassment (e.g., in the form of SLAPPs), physical attacks, online and cyberattacks, surveillance, and political capture of the media, among other forms of pressure.



On the other hand, the market imbalances and inequities of the media sector has reached the point where the survival of independent news media as a sector is in question. The critical issue of media viability, which includes questions about funding and sustainable revenue models, has been culminating for more than a decade in the face of increasingly urgent and interlinked challenges of political capture, technological disruptions, the digital advertising monopoly of big tech, and media market transformations.

Media freedom and independent journalism are central to countering disinformation and strengthening democratic participation and resilience. Yet this is only the case where independent media have the economic strength and resilience to be able to effectively hold the powerful to account and are able to report and investigate without fear of retaliation for their work. Amid this, a central challenge of protecting independent journalism is addressing the market failure that has hobbled news media as the fourth estate.

We urge the EU institutions to place supporting media freedom, independent journalism, and a vibrant, pluralistic media sector at the heart of the Democracy Shield strategy. As part of doing so, a full-scale paradigm shift in how independent media sectors are safeguarded, supported, and fostered is urgently required.

Priorities and Recommendations

We encourage the Commission when considering mechanisms and approaches to strengthen independent media as an essential element of the Democracy Shield to consider the following:

- **Take a whole system approach** to ensuring a pluralistic media and information environment. Prioritize rebuilding and strengthening media markets at all levels: local, community, national and pan-EU, with a mix of print, broadcast, and digital; commercial, non-profit, and public.
- **Position support for independent media as necessary to ensure security and stability in the EU and beyond.** A healthy media and information environment is an essential component to ensuring security, stability, and cohesion in Europe. A robust, sustainable media sector that serves its public interest function must be seen as a non-optional component of the EU's security and strategic interests.
- **Address the problem of disinformation at the root cause:** in particular, the surveillance-based business models used by major tech platforms that prioritize sensationalist, often harmful content, including disinformation, over public interest news. Efforts to address disinformation and misinformation by regulating content are insufficient to correct the underlying drivers, and are often flawed and risk creating

tools that may be used to censor legitimate content and restrict information. Moreover, such approaches fail to address the market imbalances linked to the current digital advertising model. At the same time, a robust, quality media environment with a strong local media sector is an indispensable antidote to disinformation.

- **Ensure the protection of journalism and press freedom in policies aimed at combating disinformation.** Any laws, policies, or mechanisms aimed at combating disinformation must ensure that they do not pose undue restrictions on press freedom or inadvertently give cover to actors seeking to restrain independent media under the guise of combating disinformation. This is particularly the case for any measures aiming at the removal of content such as disinformation, “fake news”, and other types of harmful speech which can be instrumentalized to target independent media and compromise free speech. All measures seeking to limit disinformation or other harmful content must include robust human rights safeguards for freedom of expression and access to information. Any efforts to remove or censor content must be rigorously monitored to ensure that critical, independent journalism is not inadvertently restricted. Efforts in this space must include meaningful involvement and consultation with independent media and media defence and free speech organizations.

In order to achieve these broader aims of supporting strong, independent media as a cross-cutting component to supporting democracy, we recommend the following:

Prioritize the development of policies that strengthen and re-balance the media market. The EU should pursue corrective measures aimed at eliminating current market inequities and distortions that have allowed for political capture of media, amplified the dominance of digital platforms, and weakened the financial viability of news media.

This would include spearheading the development of a basket of industrial policies aimed at ‘future proofing’ media systems from capture and financial instability and generating new streams of revenue for local, community, and print media. Examples could include addressing the platform dominance of the advertising market; increasing the bargaining power of media to negotiate compensation under the copyright directive as well as the AI Code of Practice for General Purpose AI; introducing digital taxes that can support multilateral funds for public interest media; developing tax incentives for advertisers, investors and subscribers to news media; and other such policies that can help rebalance the market and strengthen the financial stability of media.

Prioritize increased public funding for the most critical/vulnerable media sectors: local media and investigative journalism. There is an important role for public funding to support independent media, particularly where there are media market imbalances. This is the case in two crucial media sectors, investigative journalism and



local news, which are both essential to media pluralism and holding power to account. The EU should and can address this challenge through different funding mechanisms. Public funding must be effective, targeted, provide long-term sustainable results, and include safeguards to ensure the editorial policies of the beneficiaries remain entirely independent of public donors.

IPI's Investigative Journalism for Europe (IJ4EU) programme has funded cross-border investigative journalism programmes since 2018, enabling 230 different investigative teams with six million euros of grants. The investigations have made headlines across Europe, won prestigious awards, sparked parliamentary hearings, informed policy debates prompting high-level resignations and inspired systemic change. Crucially, IJ4EU was designed to enable taxpayer and philanthropic funds to flow, via neutral intermediaries, to watchdog journalism without fear of editorial interference. With an ironclad guarantee of editorial independence, the model protects partners from being labelled by bad actors as foreign agents.

Prioritize support for media innovation. Financial sustainability and viability are essential for ensuring that the media can cover issues freely and independently. But across the world media organizations face shrinking advertising revenue, driven by the dominance of and dependence on big tech platforms, as well as fragmentation of audiences across the media market. These and other challenges have left many outlets exposed to political capture or to dependence on donor-funded revenue models.

Innovation programmes can equip early-stage and established media organizations with the skills and tools to develop and generate new sources of revenue that can help improve economic viability, re-build and strengthen audience relationships, and leverage technology – ensuring that they remain independent, competitive, and resistant to social and political shifts.

IPI's media innovation program, which includes our flagship Media Innovation Europe (MIE) initiative, supports independent media organizations through innovation practice and business development to achieve financial sustainability, which in turn helps strengthen and ensure editorial independence. Since piloting IPI's accelerator programmes in 2022, IPI has helped 62 media outlets from 37 countries.

The EU should significantly scale up its investment in innovation and integrate it into its broader industrial programme, including supporting SMEs in particular markets. It should establish centres of excellence across the EU to bring together media executives, researchers and investors to drive innovation and revenue creation. It should support the ability of media organizations to respond and adapt to the changes brought by AI, including the application of AI to support public interest reporting.



Prioritize journalism education and training. The EU should commit funds to support a new generation of journalists trained in the highest journalistic standards and ethics. In addition, support for mid-career journalists seeking professional development including around issues of media sustainability.

The EU can spur training through public subsidies for journalism schools, investing in innovation research and development particularly on AI tools, as well as offering tax breaks for employers and freelancers who invest in training.

Prioritize expanding mechanisms for ensuring an enabling environment for journalists. The EU is already investing in programmes to help create an enabling environment for journalists to carry out their work. This includes the Media Freedom Rapid Response (MFRR), a coalition of press freedom and journalism support groups, including IPI, that works to document threats to press freedom, advocate for the protection of independent journalism, and provide support to journalists at risk.

The EU should continue and/or expand support for media stakeholders and CSOs for the following:

- Mechanisms to support journalist safety, in line with the EC's Recommendations on the Safety of Journalists.
- The ability of media stakeholders to monitor media freedom violations, campaign on cases, provide emergency support (legal and practical) and advocate policy makers for regulatory reforms to protect editorial independence and media pluralism and combat media capture.
- Enforcement of EU law on media freedom. Ensure the effective implementation of relevant EU regulations including the EMFA, DSA, Anti-Slapp Directive, and supporting the engagement of media stakeholders and CSOs in monitoring the implementation. These can only be successful if the EU provides the political will to address member states who breach EU standards
- Enabling legal environment for independent media. The EU should monitor national laws and regulation around disinformation, hate speech, foreign agent and cybercrime laws that risk being used to restrict media freedoms. The EU should tighten regulation around surveillance and the use and sale of spyware to undemocratic governments and it should protect journalists from legal harassment including SLAPPs.
- Strengthening national structures of media stakeholders to better campaign and advocate for the rights and conditions of journalists.