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Local and community media in Europe. A comparative analysis of the media pluralism monitor data between 2020 and 2023
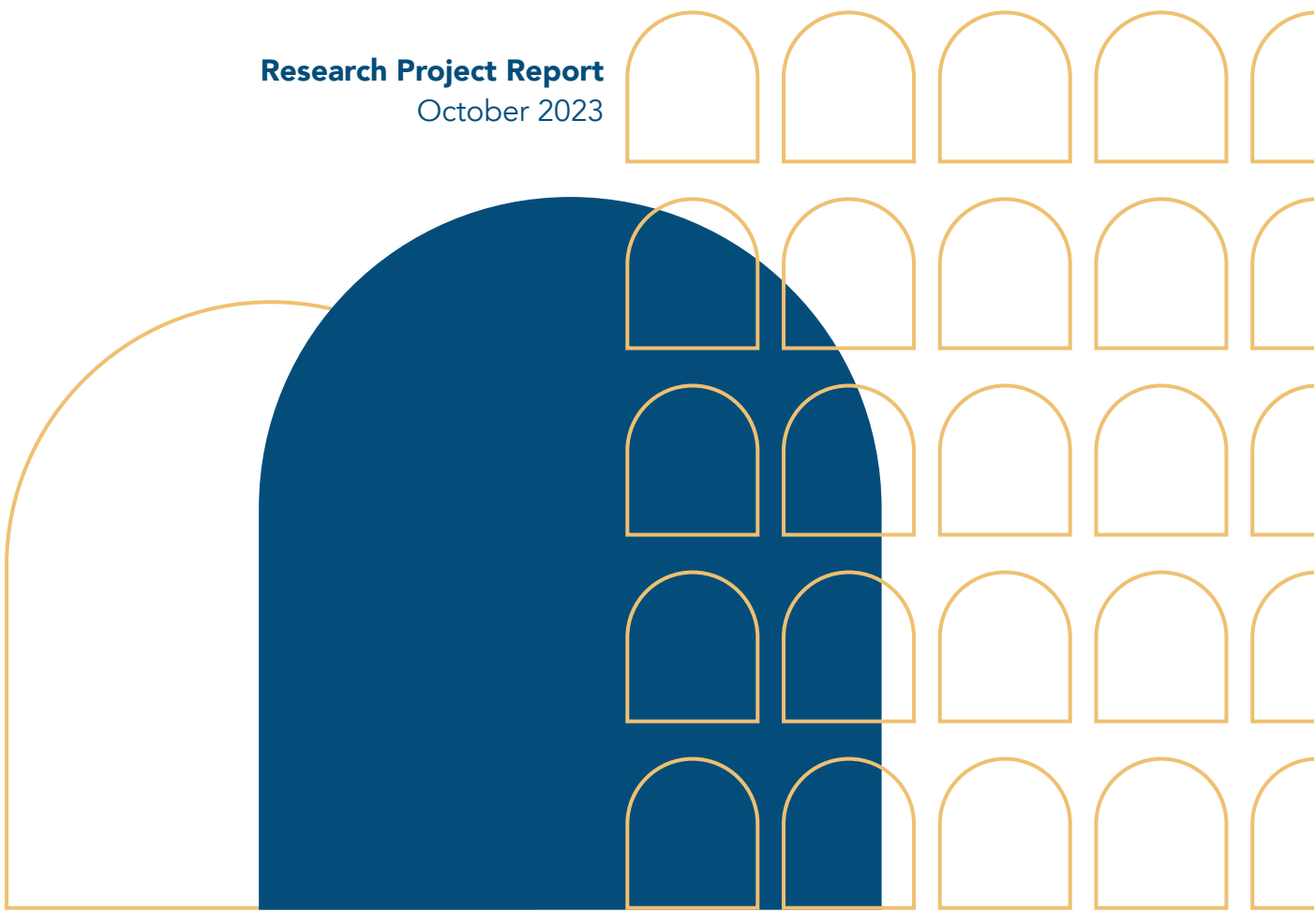
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A comparative analysis of the Media
Pluralism Monitor data between 2020 and 2023

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1. Introduction

Local and community media have traditionally received less attention in policy discussions and academic research compared to national media. The dominance of national media can be attributed to several factors, such as the well-defined boundaries of nations and the fact that media and news production tends to prioritize national agendas and champions national actors (Hanitzsch, 2009). However, there has been an increasing interest in local and community media in recent years. This is partly due to greater recognition of the importance of these media forms, and partly to a perceived crisis in the sector. Indeed, as the next section will discuss, local and community media have essential roles in a functioning democracy and in fostering inclusive communities. Over the past two decades, however, these sectors have encountered significant challenges due to digital transformation and economic downturns that have hindered their capacity to fulfil their political and social functions (Gulyas and Baines, 2020).

This report offers an international comparative analysis of key issues in local and community media across 27 EU member states and five candidate countries (Albania, Montenegro, the Republic of North Macedonia, Serbia & Turkey) based on data gathered as part of the Media Pluralism Monitor (MPM) project by the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute between 2020 and 2023. The MPM is "a research tool that was designed to identify and measure potential risks to media pluralism in the Member States of the European Union, taking into account a broad and holistic definition of media pluralism" (CMPF, 2022, p.119). The MPM has been implemented by the Centre for Media Pluralism and Media Freedom since 2013/14. Although the tool has been updated to reflect changes in the media sectors and emerging issues since then, the core principle of focusing on a broad definition of media pluralism remained encompassing different components of a media system including media supply, distribution and use, as well as legal, economic and socio-cultural considerations (CMPF 2022, p.119). The rationale for using MPM data for this comparative study is two-fold. Firstly, it provides holistic insights into various aspects of local and community media given the research design and holistic approach of the MPM tool. Secondly, it allows for a systematic comparative analysis of local and community media in the 32 countries included in the study. These advantages are significant for academic research as well as for policy discussions, both of which have been hindered by the scarcity of comprehensive data on local and community media. Additionally, there is a lack of comparative studies in the field, further underscoring the importance of this study.

The MPM tool explores the risks for media pluralism in four main areas: Fundamental Protection, Market Plurality, Political Independence, and Social Inclusiveness. These areas are assessed in relation to 20 indicators (5 per area) and 200 variables using both quantitative and qualitative data primarily from secondary sources as well expert assessments (CMPF, 2022)[1]. Eight relevant indicators[2] and 40 variables that were relevant to local and community media were used to select the data from the 2020 to 2023 MPM database. This produced a qualitative dataset, which was then investigated using thematic analysis. As Braun and Clarke (2006) suggest thematic analysis can be applied in various ways, in this research it was used within the qualitative paradigm employing flexible and organic processes of coding and theme development. The analysis revealed seven key themes that represent key issues of local and community media in the EU and the five candidate countries during the study period. The themes

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1   Find the full methodology in the MPM2023 Final report, at https://cadmus.eui.eu/handle/1814/75753 . The MPM Glossary can be found here: https://cmpf.eui.eu/wp-content/uploads/2023/09/glossary_MPM-2023_export.xls

2   The indicators were: Protection of freedom of expression, Access to media for local/regional communities and for community media, Access to media for minorities, Independence and effectiveness of the media authority, Journalistic profession, standards and protection, Media viability, Political independence of media, State regulation of resources and support to media sector.

exhibited diverse attributes and manifested uniquely across the various countries. The seven themes are: fragmented subnational media structures, political independence, sustainability, subsidies, the role of public service media (PSM), working conditions of local journalists and challenges of community media. This report first provides an overview of definitions of local and community media and their key societal roles. It then presents an analysis of the seven identified themes, concluding with a reflection on key findings and policy recommendations.

2. What are local and community media?

2.1 Interpretations of local and community media

Subnational media can be defined as media divisions or entities that occur within a geographical area that is smaller than the nation-state (Gulyas, 2023). There are different forms of subnational media, which vary significantly between countries depending on their size, political system, economic, social and cultural features, as well as media history. Local and community media are seen as two key forms of subnational media. Arguably, local media are recognised as the most prominent form of subnational media. However, there is no consensus about the meaning of local media. There are several factors contributing to the difficulty of defining local media. These include the influence of a country's size on perceptions of locality, the fact that the relevance of particular news to a specific locality is not necessarily tied to specific outlets, and the varied socio-political contexts within which subnational media operate (Blagojev et al., 2023). Thus, local media can refer to newspapers produced for millions of people in a metropolitan city, or to online news provisions for a few hundred people in a village. Apart from differences in size, local media can work on different platforms - print, broadcasting and online -, serve different communities with varied content, operate with diverse organisational goals and under different regulatory regimes. Despite the great variety, all local media have a spatial aspect – a specific geographical location - which can be regarded as their defining feature. However, "local" is also a mediatized social space that includes elements of culture, identity and language (Ali, 2017) and can be conceptualised as a sense of place. As Costera Meijer (2020, p.358) argues "What counts as local, community or regional journalism may be clear from a production perspective. From a consumer angle it depends on people's feelings of connection to a particular space, for some a neighbourhood, for others a province". Hess and Waller (2016) offer their geo-social model for understanding local news comprising five key concepts: geo-social, local, local habitus, community and sense of place. Thus, to understand local media we need to consider both their spatial as well as the social context.

Community media is another form of subnational media. Similarly to local media, community media are also interpreted differently and it is a contested term. Defining community media poses challenges for various reasons. These include the contested nature of the term "community" itself and the significant transformations brought about by digital technologies and the online environment in how these media forms function (Blagojev et al., 2023). However, as the name suggests, the concept of "community" is key to understanding it. In general, a specific characteristic of community media is that it focuses on serving the interest and needs of its community. Typically, it is seen as a third-sector, not-for-profit operation. A recent Council of Europe report describes community media as a media form that is run for the community, about the community and by the community (Peissl et al., 2022). Importantly, community in this context is interpreted broadly, and it can refer to a community in a specific geographical location or community of interest based on shared identity or experience. While community media share some

characteristics with local media, it also has some distinctive features. Community media in Europe historically tended to be not-for-profit broadcasting operations (typically radio) for a specific community, run by volunteers (rather than professional journalists), and managed by a community organisation. However, in recent years new, digital native community media forms have also emerged leveraging the opportunities of digital technologies and tools. Overall, the community media sectors vary significantly between different countries depending on legislation and levels of support.

Regional media can also play an important role in a subnational ecosystem, especially in larger countries. Again, there is no agreed definition for regional media, but commonly they are understood to be media forms that cover larger geographical regions in a country, often defined in terms of administrative political units, such as federal states, provinces or counties. A key difference between local and regional media is that the latter typically cover larger geographical areas. In Europe, in a historical context, public service media have tended to fulfil regional media roles with legislation typically requiring public service broadcasters to provide a certain amount of regional content as well as having a presence in the regions.

2.2 Importance of local and community media

Subnational media share similar societal functions with national media, however arguably have also some specific roles given their particular spatial and community context. In terms of political functions, local media are perceived to play an important part in upholding local democracies. Adapting McNair's categorisation of general political functions of media (1995), political roles of subnational media in a democratic society are:

- Informing citizens, in particular, catering to critical information needs of their communities;

- Educating citizens as to the meaning and significance of the 'facts';

- Providing a platform for public debate and discussion and fostering civic engagement;

- Holding elected officials and those in power to account;

- Providing a diversity of viewpoints;

- Acting as keystone media by underpinning national and global news ecosystems and playing a critical role in defining the state and structure of the wider political information environment (Nielsen, 2015);

- Contributing to media pluralism.

Diverse local and community media sectors are seen to have an important role in ensuring media pluralism and are often seen as an indicator of a healthy democracy and vibrant media ecology (Peissl et al., 2022). Serving the critical information needs of communities is a particularly important role of local media. The notion of critical information needs originates from the US, where it is adopted by the Federal Communications Commission, to assess how the quality of local media content meets the needs of their communities. "Critical information needs of local communities are those forms of information that are necessary for citizens and community members to live safe and healthy lives; have full access to educational, employment, and business opportunities; and to fully participate in the civic and democratic lives of their communities should they choose." (Friedland et al., 2012).

In addition to political roles, subnational media also fulfil important social and cultural functions in their communities (Hess and Waller, 2016; Gulyas and Baines, 2020), which are:

- Fostering community cohesion by bringing the community together and promoting community engagement;

- Underpinning local identity by highlighting and promoting the unique characteristics, values, and traditions of their community they serve, and creating a sense of belonging and solidarity among residents;

- Recording and preserving local history and culture by documenting and reporting on local issues and events, reflecting the unique identity of the locality;

- Promoting inclusive communities by providing media access to groups who are underrepresented in mainstream and national media, for example many community media serve minority groups and marginalised communities.

Different forms of subnational media contribute to these ideal societal roles differently. The ability of local and community media to fulfil these roles, however, depends on a number of factors, including political, economic, social and cultural systems and context in a country.

3. Key issues in local and community media in EU member states and five candidate countries (Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey)

3.1 Fragmented subnational media structures

Subnational media are present in all EU and candidate countries included in the study, but the analysis revealed significant fragmentations. Typically, there are three key subsectors: local news media, local or regional broadcasting, and community media. The subsectors vary in relation to size, dominant organisational purpose, media form and content, reach, and regulation. The analysis also revealed that there are considerable variations between the countries in terms of the size and strengths of the different subsectors. In the following, each subsector is examined highlighting key differences between the countries.

Local news media can be classified into two types: legacy local newspapers that have expanded their presence online and digital native outlets. The MPM data analysis revealed that generally, the former category is more prevalent and holds a dominant position in local media markets in many countries. However, the size of a country significantly influences the scope and scale of its local media landscape. For instance, in small countries like Luxembourg or Malta, local media is limited and closely integrated with national media structures. Where local newspapers are dominant, they have a long-standing tradition and are among the oldest forms of news media. In many Western and Northern European countries local newspapers have been published for two, sometimes three hundred years. They have been playing important political and social roles and they are perceived as key pillars of local democracy. Before the mid-2000s local newspapers were stable markets run by commercial providers, but since then digital technologies and the internet have fundamentally changed how they are produced, distributed and operated (Gulyas and Baines, 2020). Notable shifts include the transition of outlets towards online content delivery and a decline in the circulation of conventional print newspapers. Typically, their print

and online audience figures combined are higher than local radio or television audiences, albeit this varies between countries. They tend to be stronger and more popular in Western Europe, and weaker and less significant in Central and South Eastern Europe. As long-standing legacy media forms, many local newspapers have a strong brand and are regarded as trusted professional institutions. In France and Greece, for example, local newspapers are the most trusted media brands, before public service broadcasters or national news outlets (Newman et al., 2022). The MPM data analysis also revealed that the concentration of the local press market tends to be relatively high, but the levels are especially high in countries where there is no support or policy to ensure pluralism in the sector. For example, more than 90% of Hungarian and Polish local news media is controlled by one company (Batorfy et al., 2022; Klimkiewicz, 2022).

Digital native local news outlets are a relatively recent phenomenon typically referring to outlets that provide local news content online. Terminology about this sub-sector varies as they can include different types of providers. They often cater for smaller geographical areas than local newspapers, and for that reason they are also referred to as hyperlocal media (Harte et al., 2018). These outlets are often perceived as independent players with less corporate influence, and having close relationships with the communities they serve (Harte et al., 2018). They are seen as potentially filling news gaps left by larger corporate entities (Barnett and Townend, 2015), but studies suggest that hyperlocal ventures exhibit greater resilience when they are part of a diverse and thriving media ecosystem (Van Kerkhoven, 2020). The MPM data reveals that digital native news outlets now form an important part of the local and community media landscape in many countries. For example, in Spain 42% of all regional or local news sites are digital native, while 61% of all digital native sites are regional or local outlets (Negredo et al., 2023). However, assessing and researching this sector is challenging due to its volatile nature, frequent changes, and limited data availability.

In all countries in the MPM analysis, there is some form of subnational television and radio, which provide news but also other types of content. In many countries public service broadcasters offer regional provisions which tend to cover larger geographical areas. However, in some countries commercial providers also provide regional or local broadcasting services. Local television, serving small towns or districts of urban areas, is less widespread in the continent, but is popular in a few countries. For example, in Croatia weekly use of local television is higher than that of local newspapers, while in Hungary and the Netherlands they are at similar levels (Newman et al., 2022). The main reasons for the differences between countries in relation to local television are the varied policy approaches and the role of local authorities in running them. France has one of the strongest local tv scenes in Europe which is partly due to the fact that independent local television outlets have been legally recognised since 1985, before the digital age (Rebillard and Sklower, 2022). Hungary is an example where the role of local authorities has been key in the existence of local TV; it is estimated that there are 108 local television stations in the country, many of them in Budapest where local TV is available in each district operated by its local authority (Kovacs et al., 2023). Local radio on the other hand tends to be more widespread than local television, partly because they have been established for a longer period (Evens and Paulussen, 2012). Local radio seems to be particularly popular in smaller countries where local press has been historically weaker, such as in Cyprus (Christophorou and Karides, 2022).

Our data analysis indicates that community media exists in some form across all the countries included in the study. However, it is generally perceived as less prevalent compared to other subsectors of subnational media. For instance, in some small countries, especially in South and South Eastern Europe, the number of registered community media outlets is under six (for example in Malta and Republic of

North Macedonia), whilst in states where they are more established figures reach hundreds (for example in France and Germany). However, in many countries, there is a substantially higher number of unregistered outlets operating unofficially, particularly on online platforms. It is also important to note that their geographical spread varies within countries depending on the location of the communities they serve. For instance, in Finland, community TV and radio stations are predominantly concentrated in areas where Swedish-speaking minorities live. And, in many countries, community media serving migrant groups tend to be located in urban areas where those groups live. Community media tend to take broadcasting-based formats, especially radio, partly because historically it has found recognition within audio-visual legislation. However, there has been an increase in online-only community media forms in recent decades, but we have limited insights into their reach and operation as there is a dearth of data available about them. Another distinctive feature of community media is that they tend to be run by volunteers from the community who create content and manage the operation (Peissl et al., 2022).

Importantly, the fragmentation of subnational media markets is reflected in policies and regulations. None of the countries included in the study has comprehensive policies and regulatory regimes in relation to subnational media as a whole. The main sectors are regulated and supported differently. For historical reasons, broadcasting is more heavily regulated, both in terms of operations and content, than print or online provisions. Another implication of the fragmentation is that none of the countries in our report has comprehensive data about their subnational media ecosystem as a whole, for example in relation to overall local and regional news consumption or market shares. There are differences between the countries, but in general, there is a significant issue with the availability and accessibility of comprehensive data about subnational media sectors. Arguably, this is a concern as without appropriate data neither the health and performance of subnational media nor the effectiveness of policy initiatives could be evaluated.

3.2 Political independence

The picture regarding the political independence of local and community media is mixed in the 32 countries included in the study. The MPM 2022 analysis identified eight countries (Albania, Serbia, Turkey, Hungary, Malta, Poland, Slovenia and Bulgaria) that scored at high risk on political independence of media in general, nine at low risk (Belgium, Denmark, Estonia, France, Germany, Ireland, Portugal, Sweden and the Netherlands), and the rest at medium risk. In general, political independence in relation to local and community media follows a similar pattern in terms of country differences. Typically, countries that have strong democratic institutions, where public service media values and pluralism are embedded in the whole media ecosystem, and legislations require transparency regarding media ownership and financial support tend to avoid direct political interference in local and community media.

In some recent EU Member States and in candidate countries, these necessary conditions to safeguard the independence of local media are lacking, making them particularly vulnerable to political influence. For example, Mecfal reports that since 2015 local journalists in Poland have faced increasingly authoritarian restrictions on the freedom to report under the populist Law and Justice Party government (Mecfal, 2020), In addition, in 2021 the media company controlling much of the local media was taken over by a state-owned firm resulting in an editorial revamping of all newsrooms (Klimkiewicz, 2022). In Hungary, the Fidesz government has exerted its influence via ownership and direct editorial control on both publicly and privately owned local media across the country leading to significantly biased local news content (Batorfy et al., 2022). Another type of threat to the independence of local media is when local governments own or fund local media. In Slovakia, for example, local authorities often use their

financial power to influence the editorial policies of local media which they own, resulting in blatantly biased content (Urbanikova, 2022). In Lithuania, local media organisations are reported to be most at risk in relation to compromised editorial autonomy because politicians are allowed to be owners and there is a lack of transparency around the issue (Balcytiene et al., 2022). The lack of transparency concerning public procurement and state advertising is also a prevalent issue in many of these countries, exacerbating the dependence of local media on those in positions of power. Political interferences such as those mentioned above mean that in many countries in Central and South Eastern Europe local media's ability to fulfil their democratic functions and provide content to meet their audiences' critical information needs is impaired.

As well as country differences, the analysis also revealed variations between different subnational media sectors in terms of political interference. The data suggests that in nations where media control by the state is prevalent, community media can become part of the state media apparatus. An illustrative case can be found in Poland, where the influential Radio Maryja network, operating as a community media platform, demonstrates strong support for the government while benefiting from diverse public funds (Klimkiewicz, 2023). Regional provisions of PSM are more likely to score well in terms of editorial independence, as long as there is legislation and editorial guidance to protect it. But editorial autonomy in local media can be problematic even in countries with otherwise politically independent media. For example, in Finland a survey of editors-in-chief of local newspapers found that 81.5% of respondents have experienced attempts at influencing the editorial content by municipal decision-makers (Mantyoja and Manninen, 2022). Arguably political independence of local media is complicated by the fact that compared to national level media, local journalists have different, closer relationships with local politicians, where professional and personal lives are often entangled (Blagojev et al., 2023). Beyond their professional relationships, they might socialise in the same places, their children might go to the same school, or they might use the same shops. Social encounters and influences like these are difficult to regulate, however, professional codes of practice, both for local journalists and those working in local authorities, can be a useful tool to manage such relationships.

3.3 Sustainability of local media

Financial sustainability of local media has emerged in the analysis as a key issue for the sector across Europe, which reflects findings of other studies (Harte et al, 2018; Barclay et al, 2022). Most countries reported declining revenues and numbers of local media outlets throughout the data collection period, however, the overall picture is difficult to assess because of the lack of comprehensive data, as highlighted above. Figure 1 below illustrates the extent of this problem with MPM 2022 data, but the picture was similar across all study years. 18 out of the 32 countries reported that there was no data about local media revenues, and even those that conveyed high or medium risk (significant or moderate decline) did so on partial data or anecdotal evidence. There were no countries which reported low risk in relation to local media revenues. The legacy local news media has been seen as particularly adversely affected and most of the declining indicators and anecdotal evidence come from this sector. For example, in Portugal the number of newspapers declined from 732 in 2010 to 403 in 2019, while their circulation dropped from 62.1 to 22.6 printed copies per inhabitant during the same period (the figures include national papers too but most titles are local) (Fidalgo, 2021).

Figure 1 - Levels of risk reported in relation to local media revenues in MPM 2022 (% of countries)
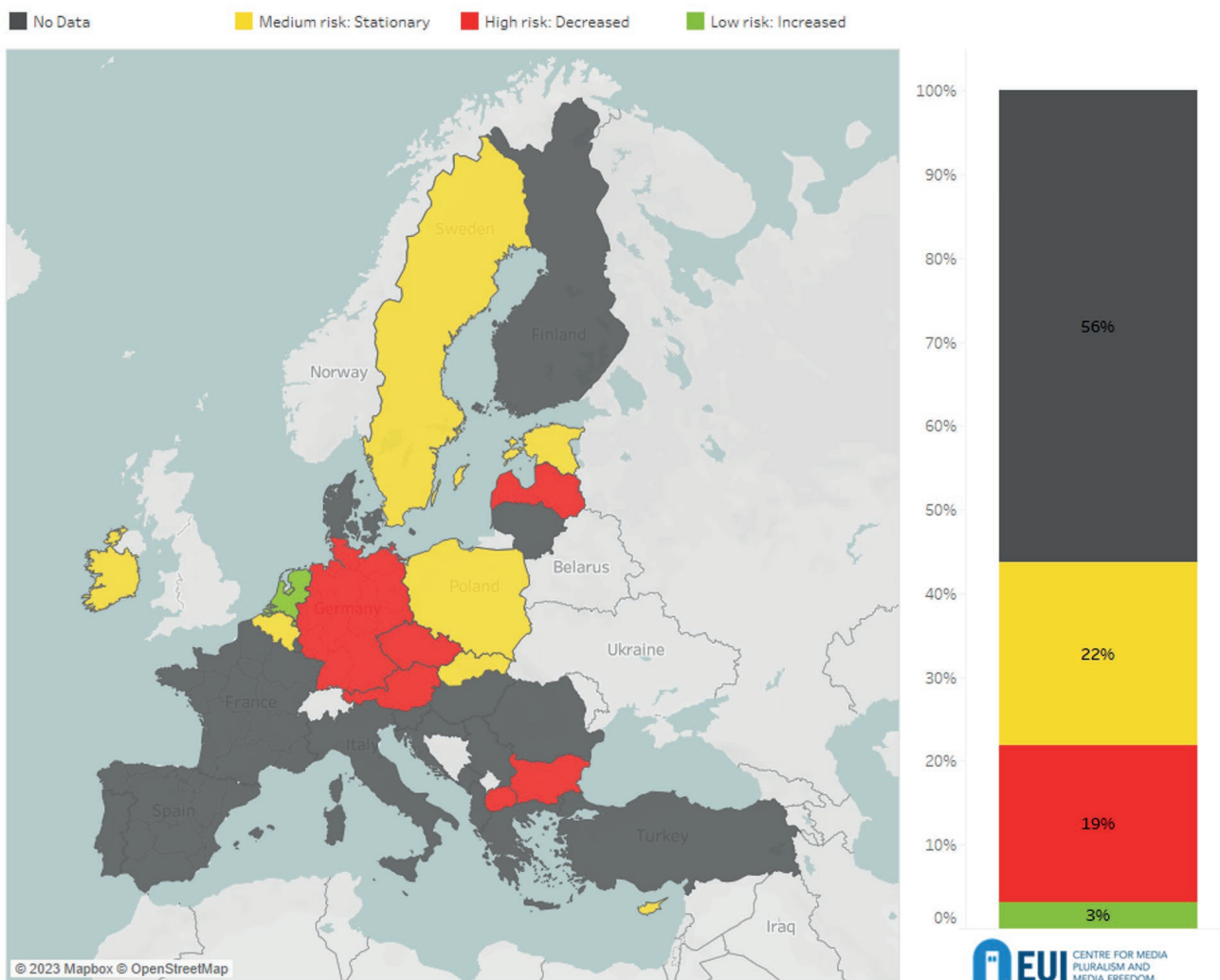
As discussed above, the legacy local news media sector has gone through a fundamental transformation in the last 20 years during which three particular factors have threatened its sustainability. First, overall, the sector has struggled to establish a stable business model for the digital era. In the pre-digital era, the two key sources of income for the local press were revenues from print copies and advertising, both of which declined significantly in the last 20 years as print circulations plummeted and advertising shifted to online platforms (Gulyas and Baines, 2020). Although online audience figures have soared for local news outlets, the majority of readers are not prepared to pay for access to the news online, and even those who do pay tend to subscribe to national news outlets and not local ones (Newman et al., 2023).

Second, local press companies have struggled to counter the power of the large platforms in the online communicative environment, in particular that of Google and Facebook, which have taken a lot of their advertising revenues. To illustrate the dominance of the platforms, in Hungary, for example, it is estimated that Facebook and Alphabet had 65% of the online advertising revenues in 2021 (Batorfy et al., 2022), while in Ireland the two platform providers accounted for 84% of all online advertising revenues in 2020 (Flynn, 2022). The platforms also threaten the sustainability of local media through their control of news aggregation and algorithmic strategies creating an uneven level playing field in the online environment (Blagojev et al., 2023).

Third, as the local press tends to rely on advertising revenues and has fewer resources, it is vulnerable to economic downturns, such as during the 2018 financial crisis or the Covid-19 pandemic. Many countries reported that local and regional media were among the worst affected during the Covid-19 pandemic among media sectors. In Portugal, for example, 27% of local and regional press owners and 44% of local radio operators reported revenue losses between 61 and 80%, according to the ERC Evaluation Report on the impact of the Covid-19 pandemic on the media sector in the country (Cadima, 2021). In Latvia, local and regional newspapers were also the worst affected, losing between 30-50% of their advertising and retail revenues in 2021 (Rozukalne, 2022).

Regional and local television has also seen financial challenges, but this varies between countries included in the analysis. Funding for regional provisions of PSM has been cut in a number of countries in recent years, which is thought to have impacted the content delivered. Albania reported that a number of local television companies closed down between 2019 and 2022 due to declining revenues, high costs and lack of subsidies to the sector. Local television in France was also hit hard by the declining advertising revenues during the Covid 19 pandemic, and as a result market concentration has increased in the sector (Rebillard and Sklower, 2022).

3.4 Subsidies for local media

The system of subsidies for subnational media is fragmented in the countries included in the analysis. Policies often focus on particular sub-sectors or actors, rather than considering the health of subnational media ecologies as a whole. As such, traditional local and regional media forms often get more support, and digital local news outlets are not supported at all in some countries. Evidence from the MPM dataset suggests that subsidies play an increasingly important part in sustaining some local media sectors, especially legacy local news outlets, likely as a result of the sustainability issues discussed in the previous section. Evidence also shows that subsidies come from different sources with different motivations. With regard to state subsidies, 20 out of the 32 countries included in the MPM study recorded having state subsidies for local media in 2021, the others did not. But as Figure 2 below illustrates, there are differences between countries in terms of the levels of subsidies available. Only 7 countries recorded adequate levels of subsidies (categorised as low risk), while in 12 there were only limited state subsidies available (categorised as medium risk). There are also differences between countries whether the subsidies targeted local media specifically, or are part of generic support schemes. For example, in 2022, 15 EU member states allocated specific subsidies for local media, four countries extended generic subsidies that encompassed support for local media outlets, while the rest did not provide subsidies for the sector (Blagojev et al., 2023). Patterns around state subsidies for local media have not changed significantly over the four years of this MPM data analysis. However, some countries offered new or additional short-term subsidies to local media because of the impact of Covid 19 pandemic on the viability of the sector during 2020 or 2021. For example, in Germany where usually there were no direct subsidies for local media, the state of North-Rhine-Westphalia provided financial support for local radio outlets (Holznagel and Kalbhenn, 2022), and in the Netherlands, the government introduced the Temporary Support Fund Local Information Provision to support local media that lost advertising revenues due to the pandemic (De Swert et al., 2022).
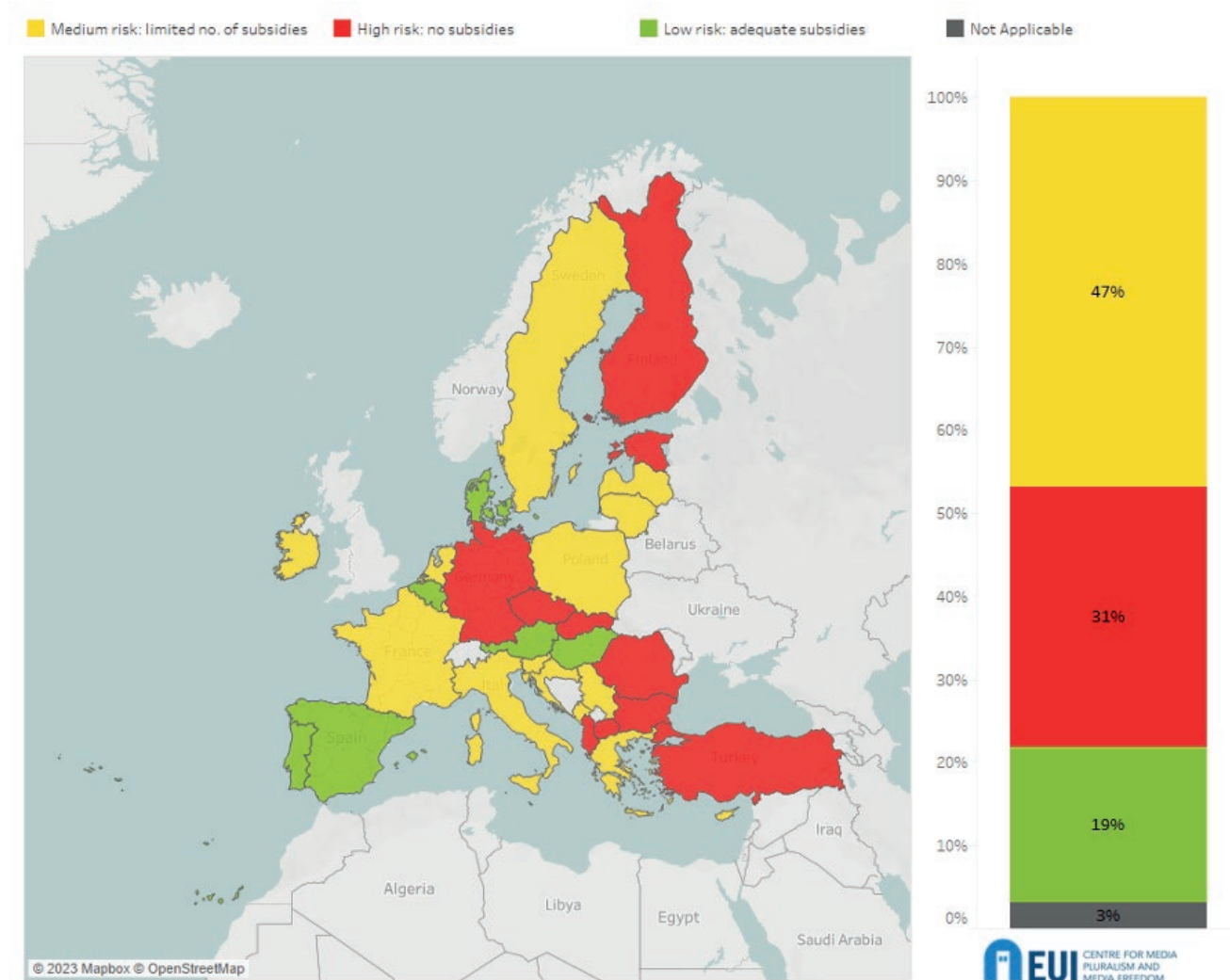
Governments' motivations to provide subsidies vary between countries. In Hungary, for example, the support system is employed as a means of political control, favouring titles that align with the government's perspectives. Conversely, in Denmark and Sweden, the subsidies aim to secure the viability of local news outlets, thereby upholding pluralism within local media ecosystems. Interestingly, six out of the seven countries that reported sufficient levels of subsidies in 2022 have media markets with limited economies of scale(Austria, Belgium, Denmark, Hungary, Portugal and Sweden) indicating that concerns about the sustainability of local media are particularly acute there. Such countries were also more likely to report in the MPM data that local media were increasingly dependent on subsidies without which the sector was perceived to be unable to financially survive. It is also notable that ten out of the twelve countries that do not have state subsidies for local media are recent EU states or candidate countries (Bulgaria, the Czech Republic, Cyprus, Estonia, Malta, Romania, Slovakia, Albania, the Republic of North Macedonia and Turkey), which suggest that levels of economic development and democratic traditions influence whether local media are supported and if yes how.

Subsidies for local media can originate not only from central governments but also from local authorities, and this type of support holds significant importance in certain countries. In France, for example, 22 out of 36 local television stations reported that subsidies from local governments constitute more than half of their revenues (Rebillard and Sklower. 2022). Subsidies from local authorities however raise concerns about undue influence in certain contexts. In Croatia, journalists' associations in the country have organized a campaign to raise awareness about the growing dependence of local media on subsidies from local authorities. They caution that these subsidies are perceived as lacking transparency and can potentially undermine the independence of local media (Bilic et al., 2022). There are also variations between the countries under analysis in terms of transparency and fairness in distributing direct state subsidies to local media. Out of the 20 countries that provide direct subsidies to local media three (Greece, Luxembourg and Turkey) were reported as high risk in terms of transparency and fairness, nine as medium risk (Austria, Belgium, Croatia, Hungary, Italy, Lithuania, Poland, Slovenia and Serbia) and eight as low risk (Denmark, France, Ireland, Latvia, the Netherlands, Portugal, Spain and Sweden), in MPM 2022.

In addition to direct subsidies, some governments also operate indirect support for local media, but the form and extent of these vary significantly. Typically, these aim to lower the costs for media operations and are used across both national and subnational levels, meaning they do not particularly target local media. For example, Austria, Germany, Italy, Spain, France, Albania, Poland, and Croatia, all have reduced VAT rates for either print or broadcasting operations, or both, that affect regional and local media operations.

Another way governments can support local media indirectly is through state advertising, which happens both at national and subnational levels. State advertising is a problematic issue in many countries. The MPM 2022 report highlights that out of 32 countries, 24 scored as high risk in relation to the distribution of state advertising; while there were two medium-risk countries (Denmark and the Netherlands), and six low-risk countries (Belgium, France, Italy, Montenegro, Portugal and Sweden) (CMPF, 2022). Unsurprisingly, all the countries in the low-risk category have regulations regarding state advertising to media, but even in their case, there could be issues around the implementation of the law (as in Montenegro) and a lack of monitoring. The concerns around state advertising are that they are used as a covert subsidy and as a way to support those media outlets that are close to those in power.

Non-state actors also provide subsidies to local media, for example, funding schemes of NGOs or international bodies, private donors and corporate players, but again there are significant variations between the countries under analysis in this regard. Generally, this kind of support does not directly focus on local or community media sectors; instead, it often revolves around specific issues, such as journalism innovation (like the Google News Initiative) or defending and supporting journalists' rights and safety (such as the European wide Media Freedom Rapid Response project[3]). While these forms of support do provide assistance to selected local or community media initiatives, they primarily operate on a short-term, project-based approach, which often fails to tackle the systemic challenges faced by local media sectors. Interestingly Google and Facebook, two of the main platforms that have contributed to the challenges of local media sectors in the online environment, have also launched initiatives aimed at supporting digital journalism and news, including at local level. However, both the Meta Journalism Project and Google News Initiative tend to focus on short term projects that have some commercial aim or outcome. In addition, support often goes to mature larger media markets with economies of

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3   https://www.mfrr.eu/

scale. The selective support for local journalism by these two platforms raises questions regarding their motivations, suggesting that they primarily prioritise backing initiatives that align with their commercial interests.

One of the implications of the declining legacy local news media sector that has emerged in the MPM data analysis is the emergence of local news deserts as a result of the closures of local news outlets and/or declining local content. The issue has become a focus of policy debates in some countries and new subsidies have been introduced as a result. Although there is no agreed definition of the term local news deserts, it generally refers to geographical areas or communities that have few or no news outlets and receive little coverage (Usher, 2015), and is concerned with spatial inequalities regarding news provision and consumption (Gulyas, 2021). Recent debates on news deserts have tended to focus on the decline of local newspapers, and as such they have been more prominent where that sector has been particularly strong historically. For example, in Sweden, new media subsidies were implemented in 2019 specifically to strengthen local journalism in areas that lack or have weak local news coverage (Fardigh, 2022). Similarly, in the Netherlands a new funding scheme (Journalistieke Professionalisering Lokale Publieke Mediadiensten) was introduced with a Euro 4.85 million budget to boost the quantity and quality of local media in the country (De Swert et al., 2022). In Germany, the state media authority in Berlin-Brandenburg is providing subsidies for local content to counteract information deficits (Holznagel and Kalbhenn, 2022), and in Denmark, the issue has been discussed in policy, professional and public forums, and there is a political drive to strengthen local media by redirecting some of the state subsidies. In response, some commercial companies have launched new local news services in geographical areas that are deemed news deserts (Newman et al., 2022). Although research on news deserts is challenging because of the lack of comprehensive data on subnational media, there are indications that areas that are economically poorer and deprived are more likely to become local news deserts. For example, in Hungary the number of local newspaper titles is reported to be higher in economically more developed areas (Kovacs et al., 2023). This corresponds to research findings in the US and the UK which found a correlation between general levels of deprivation in a community and the emergence of local news deserts (Gulyas, 2021).

3.5 Role of Public Service Media

Public service media (PMS) has a strong tradition in most parts of Europe and it has played a key role in underpinning democratic politics and providing media services that are in the public interest. However, historically PSM policies have focused on broadcasting and national level services (Van Cuilenburg and McQuail, 2003), and thus arguably played a less significant role at the local level which was dominated by commercial local media companies in Western Europe. In newer democracies of Europe PSM has a shorter history and is less established (Jakubowicz, 2008), but here too they have not been designed to deliver public service media at a local level. The MPM research explored two aspects of PSM that have particular relevance to media pluralism and diversity at the subnational level: first, the presence of PSM at the subnational level, and second, the role it plays to cater for the media needs of minority communities who are often concentrated in specific geographical localities.

In relation to the first aspect, Figure 3 below shows that PSM in over half of the countries in the study have been required by law to provide regional content and have a branch in regional centres. In Austria, for example, the public broadcaster operates regional branches in all federal states, which provide regional radio and television content (Seethaler and Beaufort, 2022). Figure 3 also illustrates that the majority of PSM in the 32 European countries under study have regional representations in practice, even

when it is not mandated by law. This is likely due to it being outlined in their code of practice or being an integral part of the public service media ethos. There are nine countries (Bulgaria, Croatia, France, Latvia, Poland, Slovenia, Spain, Republic of North Macedonia and Turkey) in the medium risk category for providing branches at regional level, this means that the representation is assessed as insufficient. This suggests that in certain countries, PSM may lack the necessary resources to sufficiently serve regional communities. In addition, the MPM data suggests that due to budget constraints, certain PSM entities are reducing their regional offerings and presence.

Figure 3 – PSM's presence at regional level as required by law and as in practice in MPM 2022 (% of countries)
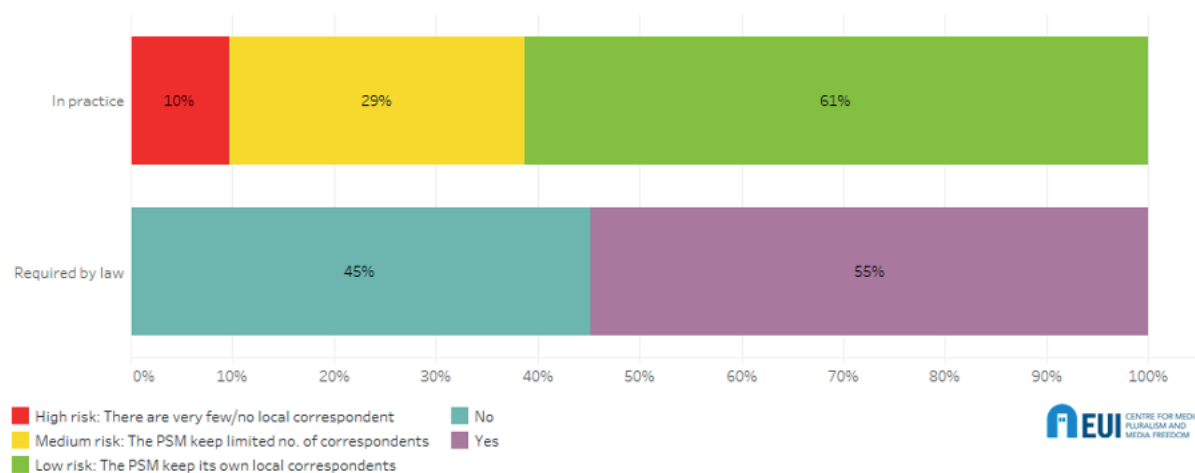
Overall, the data highlights that PSM have a regional role, rather than a local one at subnational level. There are examples though where the PSM have got involved in initiatives to enhance the provision of local news and content. For example, in the Netherlands the "Local Media Fund" (Stimuleringsfonds voor de Journalistiek) supports collaborations between public service broadcasters and local media organisations (De Swert et al., 2022), and some broadcasters have content-sharing agreements with local media companies. In addition, some countries also require the national news agency to have regional representations and provide local news content. For example, in Portugal the national news agency Lusa has legal obligations to provide a news service with public interest, as part of which it has to offer a minimum level of news services to regional and local newspapers and radio stations, as well as have branches in regional centres (Lusa, 2021).

In relation to catering for the interests of minority communities[4], PSM has held an important remit traditionally. In many EU countries where minorities are recognised, PSM are regulated to provide media access to them. Apart from national regulations, international bodies also make recommendations on the issue, such as the Organisation for Security and Co-operation in Europe's Oslo recommendations (OSCE, 1998). However, there are considerable variations between countries both in terms of regulation and practice, and according to the MPM 2022 report in the majority of countries minorities do not have adequate access to media (CMPF, 2022). There are countries (for example Sweden) which provide media access by law to both recognised and not recognised minorities, and minority groups

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4   For definition of minorities in the MPM study please see: https://cmpf.eui.eu/wp-content/uploads/2023/09/glossary_MPM-2023_export.xls

do have media access in practice. There are countries (for example Italy) that only grant media access to recognised minorities, while in practice unrecognised minorities, such as migrants and refugees, do not have media access and their representation is often biased and stereotyped (Carlini et al., 2022). There are then countries (for example France) that do not provide media access by law but in practice minorities have access (Rebillard and Sklower, 2022). And there are also countries (for example Malta) that do not provide media access by law and in practice minorities do not have access (Vassallo, 2022). The analysis suggests that there are several factors that influence to what extent and how minorities are granted media access, including the size of the country and its minority groups, their recognised status, PSM resources, and political and cultural traditions. However, arguably, there is not enough research on to what extent PSM provisions for minority communities address their critical information needs, and how it measures up against the advantages offered by community media operated by these groups.

3.6 Working conditions of local journalists

There have been increasing concerns about the working conditions of journalists recently both by professional bodies (for example Marthoz, 2023 and by the Committee to Protect Journalists and the International Federation of Journalists) and academic research (Ornebring, 2018; Haynes and Silke, 2019). The reasons behind these worsening conditions vary, but they tend to be multifold including economic pressures and industry changes, increasing political pressure and polarised political cultures, digital disruption and lack of legal protection. Concerns about working conditions for local journalists are similar to those of national journalists, including job insecurity, precarious contracts, work pressures, labour laws, declining wages, and issues with pension schemes, albeit the specific concerns vary significantly between the countries under analysis. Importantly, analysis of the MPM data revealed that the conditions of local journalists tend to be worse than those of national or international journalists, and that the Covid-19 pandemic has exacerbated the situation. For example, in Portugal local journalists are more fearful of losing their job compared to their national counterparts (Cadima, 2021), while in Belgium there are concerns that newsroom integration and industry mergers have led to increasing pressures on local journalists and layoffs (Newman et al., 2022). In France, some local journalists' jobs are not replaced or are replaced with precarious contracts. In Albania, labour rights are less likely to be respected in local media organisations (Voko and Likmeta, 2022), and in the Czech Republic, local journalists face long-term precarious work conditions (Stetka, 2022).

The MPM 2022 report found that the indicator on the working conditions of journalists on the average stand at medium risk of 62%, with four countries at low risk (Denmark, Germany, Ireland, and Sweden), 15 countries at medium risk (Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Italy, Latvia, Luxembourg, Malta, Poland, Portugal, Slovakia, Slovenia, and Spain), and 13 at high risk (Austria, Albania, Croatia, the Czech Republic, Greece, Hungary, Lithuania, Montenegro, the Netherlands, the Republic of North Macedonia, Romania, Serbia, and Turkey) (CMPF, 2022). Although these figures refer to all journalists, it is likely that variations between countries in relation to working conditions of local journalists follow a similar pattern. The existing evidence shows that, especially in recent EU states and candidate countries, local journalists often face more precarious conditions and increased risks to their safety and well-being. For example, Slavtcheva-Petkova's analysis of Bulgarian journalists as part of the Worlds of Journalism study illustrates that local journalists in the country experienced more constraints, compared to national journalists, in relation to access to information, availability of news-gathering resources, time limits, audience research and data, and relationship with news sources (Slavtcheva-Petkova, 2020). Bulgarian local journalists are also reported to face layoffs, pay cuts or inadequate remuneration for their work (Spassov et al., 2022). In Serbia, local journalists often receive their salaries on a 'cash in

hand' basis without paying social security contributions, whilst their salary is below the national average (Milutinovic, 2022). Local journalists in these countries are also more likely to have negative views about the state of their profession. Slavtcheva-Petkova's study found that the three main ways Bulgarian local journalists perceived the state of their profession were crisis and decline, dependency and servitude, and low professional and ethical standards (Slavtcheva-Petkova, 2020).

Safety of journalists is perceived to have worsened in recent years in parallel with heightened political pressure and greater polarisation in the political culture of a number of states. The Council of Europe's Safety of Journalists Platform has reported increases in Europe in almost all their safety categories, particularly in relation to the number of harassment and intimidation of journalists (which rose from 43 to 94 between 2019 and 2022) and attacks on physical safety and integrity of journalists (which rose from 33 to 74 between 2019 and 2022) (Safety of Journalists Platform, 2023). Local journalists face more risks due to a combination of factors. Their lower public visibility and close proximity to potential sources of harm contribute to this vulnerability. For example, journalist Morgan Large, who worked for Radio Kreiz Breizhin Brittany, in France, investigated the effects of intensive agriculture in her region as a consequence of which, she has been a victim of intimidation and online harassment, and her local station was attacked (Rebillard and Sklower, 2022). For example, in Hungary, verbal threats against local journalists have risen and one opposition local news portal has been hacked (Kovacs et al., 2023). In Turkey, a local radio host, Hazim Özsu was shot dead in his home by a man who later said that he disliked some of the host's comments in his radio programme (Inceoglu et al., 2022). Safety concerns surrounding local journalists pose significant challenges as they jeopardize press freedom, potentially influencing the quality of news they produce. Moreover, intimidation and harassment can adversely affect journalists' well-being, prompting self-censorship. Additionally, these concerns can erode public trust in local media.

3.7 Challenges facing community media

As highlighted previously community media have important functions in a democratic society and are seen as a valuable part of a pluralistic media ecology. While community media share some characteristics with local media, it also has some distinctive features, which have led to specific challenges. The analysis of MPM data from the 32 countries highlights three primary challenges faced by the community media sector in general: legal recognition, lack of shared understanding and definition of what community media actually means in the digital age, and lack of long-term funding model. Their severity differs between the countries, as there are significant variations across the continent regarding the state and scale of community media. In terms of legal status, community media are not recognised legally in ten countries (Bulgaria, Cyprus, the Czech Republic, Denmark, Estonia, Finland, Greece, Latvia, Montenegro, Portugal) (Blayer-Simon et al., 2023). Legal recognition has improved between 2020 and 2023 as three countries (Lithuania, Slovakia, and Luxembourg) have adopted new legal provisions that cover community media. However, even where there is legal recognition, there could be issues with what the law actually covers and stipulates, as well as with implementation. For example, community media are guaranteed access to television and radio infrastructure only in six countries (France, Germany, Ireland, Malta, Sweden, Slovakia), and their independence legally protected in 11 states (Albania, Austria, Belgium, France, Germany, Ireland, Luxembourg, Malta, Slovakia, Sweden, and the Republic of Macedonia) (Bleyer et al., 2023).

The legal status of community media directly impacts the recognition and conditions of the sector. For example, in the absence of legal recognition, minorities may encounter difficulties to access community

media. A number of countries where community media are not recognised legally have reported issues regarding the access of minorities to media. However, five countries (Denmark, Finland, Greece, Italy and the Netherlands) reported to have a community media sector whose independence is safeguarded in practice despite not having a legal status.

The second key challenge specific to community media which was identified in the analysis is that there is no agreed definition or shared understanding of what community media means, and different countries interpret the term differently both in legal terms and public discourse. For example, in Austria community media is seen as the 'third broadcasting sector' performing valuable social functions and operating without political interference. However, despite its recognized importance, the broadcasting laws lack explicit legal recognition, or detailed licensing procedures and criteria remain absent (See-thaler and Beaufort, 2022). While in Luxembourg, the 2021 media law recognized community media for the first time as 'Editeurs citoyens', specifying strict conditions including nonprofit status, citizen participation, being involved in media education, having financial resources, independence from media groups, providing local content, having professional editorial team, and non-commercial focus. While the law allocates one hundred thousand Euros annually to community media organisations that fulfil all criteria, currently, only a single outlet has satisfied these conditions (Kies et al., 2022). Meanwhile in Spain, the Law 7/2010 on Audiovisual Communication recognises community media as non profit operation, but the government has yet to establish licensing procedures or criteria since the law's enactment. As a result, there are no legally operational community media outlets in the country (Suau et al., 2022). Where community media are legally recognised it is often established as a media form in its own right, but in some countries, notably in the Netherlands it is treated as part of public service media (De Swert et al., 2022).

Arguably, digital technologies and convergence have compounded the definitional debates on community media. Traditionally, community media encompassed platforms like local radio stations, that served geographically bound communities. However, the digital era has reshaped this landscape. Online platforms, social media networks, and user-generated content have given rise to new forms of community media that are not confined to geographic proximity. The internet has also transformed how communities are defined, created, and sustained, blurring the lines between local and global affiliations. The essence of community media, once firmly anchored in localized communication, now encompasses a broader spectrum of virtual communities, global networks, and multimedia storytelling. The concept's evolution highlights the need for adaptable definitions that take into account issues of participation, interactivity, and access, as well as embrace the diverse ways people engage, communicate, and form communities in the digital age.

Figure 4 – Levels of risk reported in relation to community media's state subsidies in MPM 2022 (% of countries)
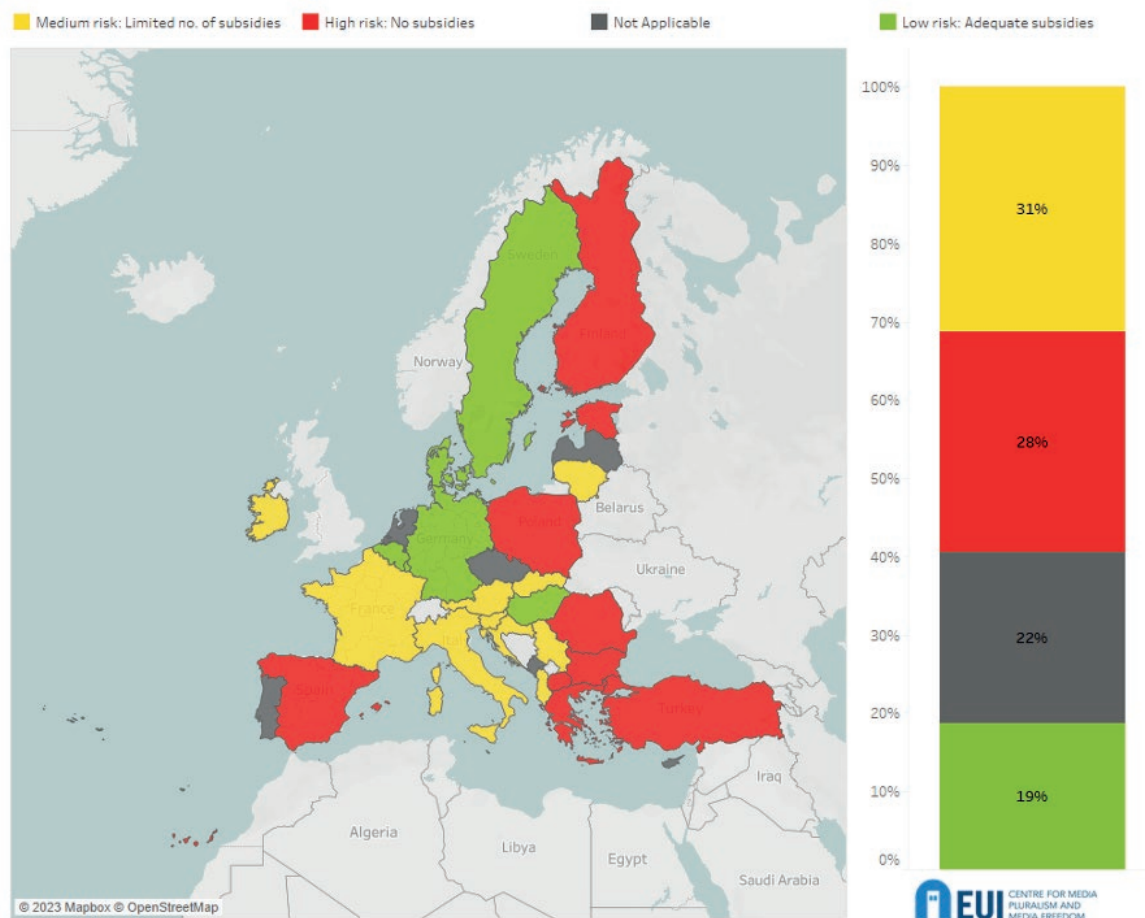
The third challenge for community media identified by the analysis was lack of long-term funding models. The data suggest that the sector is in a more precarious position overall compared to local media, mainly due to their financial models, size, and legal status. Given that community media are most of the times not for profit operations, their existence depends on access to adequate levels of funding that are reliable and consistent. However, access to such funding is problematic in the majority of countries. The finance models of community media vary between countries but can be understood as a 'mixed economy', where outlets rely on several financial resources (Evens and Paulussen, 2012). Funding support can come from different sources, but typically the main sources are central government, local authorities, private organisations and funding schemes of NGOs or international bodies (e.g. European Social Fund, EU-funded projects). A key issue with such funding arrangements is that many sources are not reliable, often project-based and short term (Peissl et al., 2022), which makes long-term planning difficult for community media organisations.

4. Conclusions and Recommendations

This report provided an international comparative analysis of local and community media in 27 EU member states and five candidate countries (Albania, Montenegro, the Republic of North Macedonia, Serbia & Turkey) based on data gathered as part of the Media Pluralism Monitor (MPM) project by the Centre for Media Pluralism and Media Freedom at the European University Institute between

2020 and 2023. Within this period the impact of Covid-19 pandemic and new policy initiatives targeting some subnational media sectors in some countries were the notable changes, but overall features and challenges of local and community media continued to be reshaped by longer term changes driven by digital technologies and online media environment. The analysis revealed seven key findings. First, subnational media are fragmented into three main sub-sectors in most countries included in the study, which vary in terms of their size, regulatory regimes, geographical coverage, media form, structure and dominant ethos. The three main sub-sectors are local news media, local and regional broadcasting, and community media. This fragmentation highlights that subnational media is not a homogenous sector.

Second, local and community media sectors vary significantly between the 32 countries included in the analysis. Four influential factors have emerged as key contributors to a pluralistic and robust subnational media landscape: a historical tradition of local media, the presence of strong democratic institutions and public service media values, and an effective subsidy system. Typically, the subnational scene is the strongest in mature democracies of Western Europe with long traditions of local media, and weaker in Central and South Eastern Europe countries, where one or more of the factors are not present. Third, political independence poses a different but pressing concern for local and community media in comparison to their national counterparts, given closer social ties with local politicians and authorities. However, it is in some Central and South Eastern Europe where direct political interference is a present and real issue.

Fourth, there are uncertainties and conflicting opinions regarding which media outlets and organisations should be responsible for delivering public service media at the local level in the digital age, given that most public service broadcasters have operated at national and regional levels historically. In many countries, there is agreement that local and community media play key political and social roles, as discussed in section 2 of this report. However, greater considerations and more research are needed about what local public media means, how best to organise and support it in the digital age. Fifth, compared to national media, local and community media are more vulnerable sectors financially, especially during economic downturns. As such, governments should have comprehensive policies to ensure local and community media are able to fulfil their important political and societal roles.

Sixth, the working conditions of local journalists are generally worse than those of national or international journalists, partly because their sector is weaker and financially more vulnerable and threats are closer. Many local journalists face job insecurity, precarious contracts, pressurised work, declining wages, and issues with pension schemes, albeit the specific concerns vary significantly between the countries under analysis. Safety is an issue as some local journalists are subject to aggression and threats, especially those working in recent EU states or candidate countries.

Seventh, the size and vibrancy of community media vary significantly between the 32 countries included in the analysis, but overall, the sector faces three key challenges: legal recognition, insufficient long-term funding model, and lack of shared understanding and definition of what community media means in the digital age. Not all these challenges are present in every country, but in general community media are in a worse state where it is not recognised legally and where media freedom and pluralism are under threat.

Based on the findings and the analysis, we make the following recommendations for policymakers and other stakeholders:

- Comprehensive data: Develop and implement initiatives to gather comprehensive data about subnational media, including their reach, audience demographics, revenue sources, and operational challenges. These data will provide a solid foundation for evidence-based policy-making and a better understanding of the subnational media landscape.

- Subsidy and support systems: Ensure that subsidy and support systems are designed to promote the vitality and sustainability of the entire subnational media ecosystem, rather than favouring specific actors or subsectors. Implement transparent and fair allocation processes to distribute subsidies and support, taking into account the diverse needs and challenges of local and community media outlets.

- Enhancing political independence and pluralism: Give greater consideration to local and community media in policy discussions and initiatives focused on addressing concerns related to political independence and pluralism in the media landscape. Implement initiatives that safeguard editorial independence, promote sustainability, encourage diversity and pluralism, foster media literacy, and facilitate collaborations and partnerships among local media organizations.

- Legislative and support system for community and non-profit local media: Establish a comprehensive legislative framework and support system to empower community and non-profit local media organisations. This system should recognize the vital social roles these media outlets play and provide resources, protections, and incentives to help them fulfil their missions effectively.

- Improved working conditions for local journalists: Recognise the challenging working conditions faced by local journalists, especially in new EU states and candidate countries. Implement tailored support programmes and initiatives to address their specific needs, such as providing training opportunities, promoting fair employment practices, and ensuring their safety and protection.

- Address the issue of local news deserts: Develop targeted support systems, including financial assistance and capacity-building programs, to address the issue of local news deserts. Encourage the establishment of new local and community media outlets and explore innovative solutions to ensure the availability of reliable local news sources in underserved areas.

- Clarify the role of local public media: Foster greater considerations and provide clarity on the role of *local public media* in policy discussions and initiatives. Explore best practices and operational models for local public media, including how to effectively implement and support their missions to serve the public interest at the local level.

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