



## EFJ Position on the revision of the EC broadcasting communication

The [European Federation of Journalists](#) and its affiliates strongly believe that Public Service Media (PSM) has an increasingly important role in today's fragile information ecosystem, dominated by few digital platforms, who are private enterprises and base their business model purely on "attention economy". Therefore, it is paramount that PSM can work within financial sustainability, full transparency and political independence. The [2009 Broadcasting Communication \(BComm\)](#) has been and still is a very useful tool that provides guidelines to assess, if public funding for PSM organisations complies with EU state aid rules.

The EFJ believes that the BComm provides the indispensable conditions for financial transparency and proportionality and respect for Member States' wide discretion in defining and financing their public remit following the Amsterdam Protocol. It recognises the distinct role of PSM in promoting public interest content, cultural diversity, social inclusion all within the national defined public interest remit.

In our view, there is no need for a revision of the BComm. By contrast, in times of democratic erosion and unprecedented attacks on media freedom and widely spreading disinformation, independent, transparent and viable PSM with strong journalistic programming must be promoted and this Communication is one of several EU regulations that sustain this. We believe it is not only still fit for purpose but possibly more important than before. Therefore, the EFJ having members in all media responds to this consultation.

In the case of any revision however, the dominance of powerful global online platforms, who are today's gatekeepers of information without being held sufficiently accountable, must be taken into account. While the EFJ supports a media environment with strong public and private media actors producing reliable editorial content, we believe that PSM must be able to reach all citizens, ensuring they can fulfill their mission through all relevant formats (audio, video, images, text) and technologies (AI). The claim that PSM harms private print- and online media is not empirically proven. By contrast, quantitative analysis suggests a **positive and significant association**, indicating that well-funded PSM co-exist with flourishing commercial media. For instance, a 1% increase in PSM investment was associated with an increase in publisher online news revenues of between **0.54% and 0.78%**<sup>1</sup>.

The revision of the Broadcasting Communication matters well beyond the PSM sector itself. It will define the conditions under which Member States may finance and organise PSM in a converged digital environment, thereby shaping the broader European media, artistic and

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<sup>1</sup> Economic study on the impact of publicly funded PSM activities on commercial online news publishers, June 2025:

[https://www.ebu.ch/Publications/Reports/open/EBU\\_Study-debunking-crowding-out-Full-report.pdf](https://www.ebu.ch/Publications/Reports/open/EBU_Study-debunking-crowding-out-Full-report.pdf)

cultural ecosystem. Change regarding media use, outreach, algorithmic curation and new formats is motivated by external big tech ‘giants’, and the need to preserve cultural identity, local and international journalistic coverage on all formats and local industries. A policy framework fit for the platform age requires a financial framework that is fully aligned with these ambitions. Audience universality with the platform age demands resources and creative approaches. Strategic and financial incentives for PSM are needed ever more to innovate and successfully adapt to the on-demand driven media landscape, in order to meet changing viewer preferences, attract underserved audiences and meet the public remit. The EFJ together with civil society and academia agree on the need to develop and/or strengthen the PSM online portal, but also media and digital literacy.

The recently adopted European Media Freedom Act (EMFA) with Article 5 mandates that PSM must have "*adequate, sustainable and predictable financial resources*" to perform their duties and develop their capacity. Therefore, a State aid review must be based on such crucial references thereby preventing structural underfunding, a trend we see in several member states on the rise.

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