

NEWS MEDIA EUROPE

Trilogues recommendations on the European Media Freedom Act (October 2023)

News Media Europe is the voice of the progressive news media industry in Europe, representing over 2,700 news brands in print, online, radio and TV, through national associations from sixteen countries. Together, we defend key principles which are vital to us: protecting the freedom of the press, championing the digital future of our industry, and ensuring that the value of content is properly protected.

As we are entering the trilogue phase, News Media Europe wishes to clarify the position of its members in 10 points. This should be considered a package without any priority order. We remain committed to striking a compromise that protects European media companies, through:

1. High protection of journalistic sources free from spyware and with limited and well-defined derogations (Article 4.2)

- We support a high level of protection of journalists and their sources. Unfortunately, both mandates are broad and leave room for interfering with the work of journalists and newsrooms. We particularly disagree with the Council's excessively broad derogations based on an *"overriding requirement in the public interest"* (Article 4.2a new) and *"national security"* derogations (Article 4.4 new). Hence, we support the European Parliament's wording as a bare minimum protection level.

2. Enforcing the rights of media service providers before independent complaint bodies (Article 4.3)

- We suggest a solution inspired from the wordings of the Council and Parliament, making sure the complaint body is *"structurally and functionally independent authority or body such as an ombudsperson"* (supporting Parliament's Article 4.3) and would *"have relevant expertise"* (supporting Council's addition in para 3). In addition, during the monitoring phase of Article 25, Member States must be held accountable for the designation of legally and functionally independent complaint bodies.

3. Ensuring fair competition and making sure that public service media does not crowd out private media (Article 5)

- The EMFA should not review existing EU state aid rules. Nor should the regulation allow public service media to develop publicly-funded press articles which would directly enter in competition with that of the private press, on unfair terms. Hence it is crucial to strike out *"while allowing for the development of media services for new audience interests or new content and media forms and for technical development"* (European Parliament's Article 5.3).
- We agree the regime should include a carve out for private media undertakings *"that have agreed to carry out certain specific tasks of general interest in return for payment, as a limited part of their activities"* (supporting Council's Recital 7a new).

4. Clarifying editorial independence safeguards, within the media service providers' editorial line (Article 6.2)

- We need to make sure that *"editors"* can take editorial decisions independently and freely *"within the [established] editorial line of the media service provider"*. The term *"editor"* in the Council's position works well across sectors (press, tv, radio etc) while respecting national traditions.

NEWS MEDIA EUROPE

- However, it should be very clear that only editors make editorial decision. We thus suggest a revised Council's wording to "guarantee that editorial decisions are ~~can be~~ taken freely by editors within the established editorial line of the media service provider".

5. Applying transparency of funding from third-country administrations (Article 6.2)

- Media service providers should disclose funding coming from public authorities from states outside of the European Union, consistent with the objective of tackling undue influence and preserving the independence of European media. Hence, we support Parliament's position: "*Media service providers which receive public funds from third countries for the purposes of advertising or purchases shall annually submit a report to the national regulatory authority or body*"(Article 6.2 a new).

6. Establishing a genuine dialogue between media and large platforms in the interest of access to information online (Article 17)

- We reject the Parliament's long list of criteria in the self-declaration, which is over-prescriptive and risks turning into a regulation of media service providers through the back door. Instead, we support the Council's proposal, substantiating the self-declaration with the contact details of the relevant authority or body (supporting Council's Article 17.1).
- We agree with a fast-track procedure for the moderation of media content and support i) a 24-hour stay up obligation, before the restriction taking effect (supporting the European Parliament's Article 17.2) ii) with a 24-hour deadline for large platforms to handle media complaints (supporting the European Parliament's Article 17.3). The platform must in any case inform the media service provider of the decision.
- This should be without prejudice to the media service provider's "*right to effective judicial protection*" (supporting Parliament's Article 17.6a new).

7. Supporting the financial viability of media companies, making sure media merger rules remain flexible and close to the transaction (Article 21)

- The EMFA should not come up with a strict and harmonised definition of "media pluralism" as it remains a concept attached to national traditions, especially in the cultural sector (rejecting European Parliament's Article 2.1(13a)).
- Not all media market mergers and acquisitions have an adverse impact on media plurality or editorial independence. Therefore, the Regulation should focus on those mergers that have a significant impact on the internal market (supporting a mix between the Commission's and the Council's Article 21.1) and consider "*measures taken by media service providers with a view to guaranteeing the independence of editorial decisions*" (supporting Council's Article 21.2 (b)).
- We again ask to include that the media pluralism test considers all players on the market, including public service media and very large online platforms (new Article 21.2 da).
- We support clear deadlines for the media pluralism assessment. Member States should "*specify in advance a reasonable period of time by which the national regulatory authority or body conducting the assessment is to complete the assessment*" (Parliament's Article 21.1 d a new).
- The opinion of the Board should be delivered within clear timeframes, e.g. "*within 14 calendar days*" (Article 21.5).

8. Keeping the Board as an advisory body with a light structure, without slowing down necessary media transactions (Articles 22, 11).

NEWS MEDIA EUROPE

- National authorities should remain in the front seat in mergers assessment. The multiplication of players involved could play at the detriment of newsrooms and slow down necessary consolidation. Hence, the Board should only be consulted for media mergers “likely to affect the functioning of the internal market” (supporting the Council’s Article 12.g.ii).
- The Board should remain an advisory body without regulatory powers over the press. We also disagree with further centralisation on media concentration and therefore reject intervention from the European Commission through “delegated acts” (rejecting Parliament’s Article 22a).
- As a compromise, we support the creation of an “Expert Group” composed of press representatives to advise the Board on an ad hoc basis (as proposed by Parliament’s Article 11a new).

9. Applying fair audience measurement systems, including for local media (Article 23)

- Audience measurement should remain industry-led “with self-regulatory mechanisms jointly agreed and widely accepted within the media industry” (supporting Parliament’s Article 23.1)
- Transparency obligations should include “online platforms”, as proposed in both Council and Parliament’s mandates (Article 23.3).
- We disagree with the transfer of audience measurement systems “free of charge” by proprietary providers (supporting Council’s Article 23.2).
- In the drawing up of codes of conduct “special consideration shall be given to ~~local small~~ local media in order to ensure that their audiences are properly measured” (amending Parliament’s Article 23.3).

10. Bringing greater state advertising transparency, including towards social media and large platforms, and binding on all public administrations (Article 24)

- The transparency obligations must extend to public funding granted to “providers of online platforms or providers of online search engines” (supporting Parliament’s Article 24.2).
- All public authorities and regulators at Union, national, regional and local level shall meet the transparency and non-discriminatory obligations (supporting Parliament’s Article 24.2).
- In order to accommodate the needs of local and regional media, we should not provide a strict cap on the amount of public funding they could receive, (rejecting Parliament’s 15% cap in Article 24.1).

Contact:

Wout van Wijk (Executive Director): wout.vanwijk@newsmediaeurope.eu

Aurore Raoux (Policy Manager): aurore.raoux@newsmediaeurope.eu

NEWS MEDIA EUROPE

ANNEX

1. Journalistic sources

Article 4	European Commission	European Parliament	Council	Suggested compromise
109	Article 4 Rights of media service providers	Article 4 Rights of media service providers	Article 4 Rights of media service providers	
Article 4(2)				
111	2. Member States shall respect effective editorial freedom of media service providers. Member States, including their national regulatory authorities and bodies, shall not:	2. <u>The Union</u> , Member States <u>and private entities</u> shall respect <u>the effective editorial freedom and independence</u> of media service providers. Member States, including their national regulatory authorities and bodies, <u>Union institutions, bodies, offices and agencies and private entities</u> shall not:	2. Member States shall respect effective editorial freedom of media service providers. Member States, including their national regulatory authorities and bodies, shall not interfere in or try to influence editorial policies and editorial decisions by media service providers.	Our suggestion is to reject the Council's wording and fall back on the Parliament's position throughout Article 4(2).

2. Rights of media service providers

Article 4(3)	European Commission	European Parliament	Council	Suggested compromise
115	3. Without prejudice and in addition to the right to effective judicial protection guaranteed to each natural and legal person, Member States shall designate an	3. Without prejudice and in addition to the right to effective judicial protection guaranteed to each natural and legal person, Member	3. Without prejudice and in addition to the right to effective judicial protection guaranteed to each natural and legal person, Member	3. Without prejudice and in addition to the right to effective judicial protection guaranteed to each natural and legal person, Member

NEWS MEDIA EUROPE

	<p>independent authority or body to handle complaints lodged by media service providers or, if applicable, their family members, their employees or their family members, regarding breaches of paragraph 2, points (b) and (c). Media service providers shall have the right to request that authority or body to issue, within three months of the request, an opinion regarding compliance with paragraph 2, points (b) and (c).</p>	<p>States shall designate <u>an structurally and functionally independent authority or body, such as an ombudsperson,</u> to handle complaints lodged by media service providers or, if applicable, their family members, their<u>the</u> employees <u>of media service providers</u> or their family members, <u>or any other person professionally or privately associated with them,</u> regarding breaches of paragraph 2, points <u>(aa), (b), (ba), (c), (ca) and (cb)</u>(b) and (c). Media service providers shall have the right to request that authority or body to issue, within three months of the request, an opinion regarding compliance with paragraph 2, points <u>(aa), (b), (ba), (c), (ca) and (cb)</u>(b) and (c).</p>	<p>States shall designate an independent authority or body to handle complaints lodged by media service providers or, if applicable, their family members, their employees or their family members. Member States shall ensure that media service providers or their editorial staff, or any persons who, because of their regular relationship with a media service provider or its editorial staff, may have information that could identify journalistic sources have a right to an effective judicial protection in cases regarding breaches of paragraph 2, points (b) and (c). Media service providers shall have the right to request that authority or body to issue, within three months of the request, an opinion regarding compliance with paragraph 2, points (b) and (c). 2a. Member States shall entrust an independent authority or body with relevant expertise to provide assistance to those persons with regard to the exercise of such right where no self-regulatory bodies or mechanisms are in place to provide such assistance.</p>	<p>States shall designate <u>a structurally and functionally independent authority or body, such as an ombudsperson,</u> to handle complaints lodged by media service providers or their family members, <u>the</u> employees <u>of media service providers</u> or their family members, <u>or any other person professionally or privately associated with them,</u> regarding breaches of paragraph 2. Media service providers shall have the right to request that authority or body to issue, within three months of the request, an opinion regarding compliance with paragraph 2.</p> <p><i>Member States shall entrust an independent authority or body with relevant expertise to provide assistance to those persons with regard to the exercise of such right where no self-regulatory bodies or mechanisms are in place to provide such assistance.</i></p> <p><i>The designation and functioning of complaint bodies shall be assessed by the European Commission during the monitoring phase referred to in Article 25 of this Regulation.</i></p>
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NEWS MEDIA EUROPE

Article 25(3), point (ba)		European Commission	European Parliament	Council	Suggested compromise
275a			<p>3. The monitoring exercise shall, <u>in particular</u> include:</p> <p><u>(ba) include a continuous and detailed assessment of the implementation of Articles 3, 4 and 7;</u></p>		<p>3. The monitoring exercise shall, <u>in particular</u>:</p> <p><u>(ba) include a continuous and detailed assessment of the implementation of Articles 3, 4 and 7;</u></p> <p><u>b(a)(new): a list of the complaint bodies put in place by the Member States to enforce media companies' rights referred to in Article 4, their role, characteristics and independence safeguards.</u></p>

3. Public service media

Article 5(3)	European Commission	European Parliament	Council	Suggested compromise
121	3. Member States shall ensure that public service media providers have	3. Member States shall ensure that public service media providers have	3. Member States shall ensure that funding procedures for public	We support the Council's wording:

NEWS MEDIA EUROPE

	<p>adequate and stable financial resources for the fulfilment of their public service mission. Those resources shall be such that editorial independence is safeguarded.</p>	<p>adequate, <u>sustainable and predictable</u> and <u>stable</u> financial resources <u>on a multiannual basis</u> for the fulfilment of their public service mission <u>remit and to meet the objectives thereof</u>. Those resources <u>and the process by which they are allocated shall be based on transparent criteria laid down in advance and</u> shall be such that editorial independence is safeguarded <u>while allowing for the development of media services for new audience interests or new content and media forms and for technical development</u>.</p>	<p>service media are transparent, objective and seek to guarantee that public service media providers have adequate and stable financial resources for <u>corresponding to</u> the fulfilment of their public service mission <u>remit</u>. Those resources shall be such that editorial independence is safeguarded.</p>	<p>3. Member States shall ensure that <u>funding procedures for public service media are transparent, objective and seek to guarantee that public service media providers have adequate and stable financial resources corresponding to the fulfilment of their public service remit</u>. Those resources shall be such that editorial independence is safeguarded.</p>
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Recital 7a	European Commission	European Parliament	Council	Suggested compromise
17b			<p>(7a) Public service media providers should be understood as those concurrently entrusted with a public service remit and receiving public funding for the fulfilment thereof. This should not cover private media undertakings that have agreed to carry out certain specific tasks of general interest in return for payment, as a limited part of their activities.</p>	<p>(7a) Public service media providers should be understood as those concurrently entrusted with a public service remit and receiving public funding for the fulfilment thereof. This should not cover private media undertakings that have agreed to carry out certain specific tasks of general interest in return for payment,</p>

NEWS MEDIA EUROPE

				as a limited part of their activities.
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4. Editorial independence safeguards

Article 6(2)	European Commission	European Parliament	Council	Suggested compromise
128	2. Without prejudice to national constitutional laws consistent with the Charter, media service providers providing news and current affairs content shall take measures that they deem appropriate with a view to guaranteeing the independence of individual editorial decisions. In particular, such measures shall aim to:	2. Without prejudice to national constitutional laws consistent with the Charter, media service providers providing news and current affairs content shall take measures that they deem appropriate with a view to guaranteeing the independence of individual editorial decisions. In particular, such measures shall aim to:	2. Without prejudice to national constitutional constitutional or other national laws consistent with the Charter, media service providers providing news and current affairs content shall take measures that they deem appropriate with a view to guaranteeing the editorial independence of individual editorial decisions . In particular, such measures shall aim to:	Supporting Council's wording: 2. Without prejudice to constitutional or other national laws consistent with the Charter, media service providers providing news and current affairs content shall take measures that they deem appropriate with a view to guaranteeing editorial independence. In particular, such measures shall aim to:
Article 6(2), point (a)				
129	(a) guarantee that editors are free to take individual editorial decisions in the exercise of their professional activity; and	(a) guarantee that editors and editors-in-chief are free to take individual editorial decisions in the exercise of their professional activity within the editorial line of the media service provider ; and	(a) guarantee that editors are free to take individual editorial decisions in the exercise of their professional activity editorial decisions can be taken freely within the established editorial line of the media service provider ; and	Amending Council's wording: a) guarantee that editorial decisions are taken freely by editors within the established editorial line of the media service provider ; and

NEWS MEDIA EUROPE

Article 6(2), point (b)				
130	(b) ensure disclosure of any actual or potential conflict of interest by any party having a stake in media service providers that may affect the provision of news and current affairs content.	(b) ensure disclosure of any actual or potential conflict of interest, <u>and of any attempts of interference in the editorial decisions of media service providers</u> by any party having a stake in media service providers that may affect the provision of news and current affairs content.	(b) ensure disclosure of any actual or potential conflict of interest by any party having a stake in media service providers that may affect the provision of news and current affairs content.	Supporting Commission and Council's wording: (b) ensure disclosure of any actual or potential conflict of interest by any party having a stake in media service providers that may affect the provision of news and current affairs content.

5. Third-country funding

Article 6(2a)	European Commission	European Parliament	Council	Suggested compromise
130a		<p><u>2a. Media service providers which receive public funds from third countries for the purposes of advertising or purchases shall annually submit a report to the national regulatory authority or body. Such reports shall include at least the following details:</u></p> <p><u>(a) the names of the entities granting public funds;</u></p>		<p>Supporting Parliament's wording:</p> <p><u>2a. Media service providers which receive public funds from third countries for the purposes of advertising or purchases shall annually submit a report to the national regulatory authority or body. Such reports shall include at least the following details:</u></p> <p><u>(a) the names of the entities granting public funds;</u></p>

NEWS MEDIA EUROPE

	<p><u>(b) the total annual amount of the public funds granted.</u></p> <p><u>The national regulatory authority or body shall make information reported pursuant to the first subparagraph publicly available.</u></p>		<p><u>(b) the total annual amount of the public funds granted.</u></p> <p><u>The national regulatory authority or body shall make information reported pursuant to the first subparagraph publicly available.</u></p>
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6. Access to media content online

Article 17	European Commission	European Parliament	Council	Suggested compromise
211	<p>Article 17</p> <p>Content of media service providers on very large online platforms</p>	<p>Article 17</p> <p>Content of media service providers on very large online platforms</p>	<p>Article 17</p> <p>Content of media service providers on very large online platforms</p>	<p>Article 17</p> <p>Content of media service providers on very large online platforms</p>
Article 17(1)				
212	<p>1. Providers of very large online platforms shall provide a functionality allowing recipients of their services to declare that:</p>	<p>1. Providers of very large online platforms shall <u>ensure that decisions concerning content moderation and any other actions they undertake do not negatively impact media freedom and pluralism. They shall ensure that their content moderation and monitoring processes have adequate human resources to cover all languages and geographical regions of the Union. They shall</u> provide a functionality</p>	<p>1. Providers of very large online platforms shall provide a functionality allowing recipients of their services to declare that:</p>	<p>1. Providers of very large online platforms shall provide a functionality allowing recipients of their services to:</p>

NEWS MEDIA EUROPE

		allowing recipients of their services to declare that :		
Article 17(1), point (a)				
213	(a) it is a media service provider within the meaning of Article 2(2);	(a) it is that they are <u>media service providers</u> within the meaning of Article 2(2) <u>and fulfil the duty set out in Article 6(1);</u>	(a) declare that it is a media service provider within the meaning of Article 2(2) and complies with Article 6(1);	Supporting the Council's self-declaration system: (a) declare that it is a media service provider within the meaning of Article 2(2) and complies with Article 6(1);
Article 17(1), point (b)				
214	(b) it is editorially independent from Member States and third countries; and	(b) it is that they are editorially independent from <u>any Union institution, body, office or agency and from</u> Member States, <u>political parties</u> and third countries; <u>and that they are functionally independent from private entities whose corporate purpose is not related to the creation or dissemination of media services;</u>	(b) declare that it is editorially independent from Member States and third countries; and	(b) declare that it is editorially independent from Member States and third countries;
Article 17(1), point (c)				
215	(c) it is subject to regulatory requirements for the exercise of editorial responsibility in one or more Member States, or adheres to a co-regulatory or self-regulatory mechanism governing editorial	(c) it is that they are subject to regulatory requirements for the exercise of editorial responsibility <u>and oversight by a competent national regulatory authority or body</u> in one or more Member States;	(c) declare that it is subject to regulatory requirements for the exercise of editorial responsibility in one or more Member States, or adheres to a co-regulatory co- or self-regulatory mechanism governing	(c) declare that it is subject to regulatory requirements or adheres to a co- or self-regulatory mechanism widely recognised by and accepted in the relevant media sector in one or more Member States, for the

NEWS MEDIA EUROPE

	standards, widely recognised and accepted in the relevant media sector in one or more Member States.	or adheres to <u>or that they comply with</u> a co-regulatory or self-regulatory mechanism governing editorial standards <u>that is transparent, legally,</u> widely recognised and <u>widely</u> accepted in the relevant media sector in one or more Member States ;	editorial standards,[...] widely recognised by and accepted in the relevant media sector in one or more Member States , for the exercise of editorial responsibility and editorial standards; and	exercise of editorial responsibility and editorial standards; and
Article 17(1), point (ca)				
215a		<u>(ca) that they do not provide content generated by an artificial intelligence system without subjecting such content to human oversight and editorial control;</u>		
Article 17(1), point (cb)				
215b		<u>(cb) their name and the name of their managing director, their professional contact details, including an email address and telephone number, and their place of establishment;</u>		
Article 17(1), point (cc)				
215c		<u>(cc) information about the competent national regulatory authority or body or the representative of the co-regulatory</u>		

NEWS MEDIA EUROPE

		<u>or self-regulatory mechanism to which they are subject.</u>		
Article 17(1), point (d)				
215d			(d) provide the contact details of the relevant national regulatory authorities or bodies or representatives of the co- or self-regulatory mechanisms referred to in point (c).	(d) provide the contact details of the relevant national regulatory authorities or bodies or representatives of the co- or self-regulatory mechanisms referred to in point (c).
Article 17(-1), second subparagraph				
215e			In case of reasonable doubts concerning the media service provider's compliance with point (c), the provider of a very large online platform shall seek confirmation on the matter from the relevant national regulatory authority or body or the relevant co- or self-regulatory body.	In case of reasonable doubts concerning the media service provider's compliance with point (c), the provider of a very large online platform shall seek confirmation on the matter from the relevant national regulatory authority or body or the relevant co- or self-regulatory body.

Article 17(2)	European Commission	European Parliament	Council	Suggested compromise
216	2. Where a provider of very large online platform decides to suspend the provision of its online intermediation services in relation to content provided by a media service provider that	2. Where a provider of <u>a</u> very large online platform decides to suspend <u>or restrict</u> the provision of its online intermediation services in relation to content provided by a media	2. Where a provider of a very large online platform decides to suspend the provision of its online intermediation services in relation to content provided by a media service	Supporting the EP wording" 2. Where a provider of <u>a</u> very large online platform decides to suspend <u>or restrict</u> the provision of its online intermediation

NEWS MEDIA EUROPE

	<p>submitted a declaration pursuant to paragraph 1 of this Article, on the grounds that such content is incompatible with its terms and conditions, without that content contributing to a systemic risk referred to in Article 26 of the Regulation (EU) 2022/XXX [Digital Services Act], it shall take all possible measures, to the extent consistent with their obligations under Union law, including Regulation (EU) 2022/XXX [Digital Services Act], to communicate to the media service provider concerned the statement of reasons accompanying that decision, as required by Article 4(1) of Regulation (EU) 2019/1150, prior to the suspension taking effect.</p>	<p>service provider that submitted a declaration pursuant to paragraph 1 of this Article, on the grounds that such content <u>provided by a recognised media service provider because that media service</u> is incompatible with its terms and conditions, <u>it shall, without that content contributing prejudice to the mitigating measures in relation</u> to a systemic risk referred to in Article 26 of the <u>34 of</u> Regulation (EU) 2022/XXX [Digital Services Act], <u>it shall take all possible measures, to the extent consistent with their obligations under Union law, including</u> <u>2022/2065, communicate to that recognised media service provider the reasons accompanying that decision, specifying the specific clause in the terms and conditions with which the media service was incompatible, as required by Article 4(1) of</u> Regulation (EU) 2022/XXX [Digital Services Act], <u>to communicate to the media service provider concerned the statement of reasons accompanying that decision, as required by Article 4(1) of</u> Regulation (EU) 2019/1150, <u>2019/1150 and Article 17(3) of</u> Regulation (EU) <u>2022/2065.</u></p>	<p>provider that submitted a declaration and contact details pursuant to paragraph 1 of this Article or to restrict the visibility of the content provided by such media service provider, on the grounds that such content is incompatible with its the terms and conditions of the online intermediation services, without that content contributing prejudice to the mitigating measures in relation to a systemic risk referred to in Article 26 of the <u>34 of</u> Regulation (EU) 2022/XXX [Digital Services Act] <u>2022/2065,</u> it shall take all possible measures, to the extent consistent with their obligations under Union law, including Regulation (EU) 2022/XXX [Digital Services Act], to communicate to the media service provider concerned the statement of reasons accompanying that decision, as required by Article 4(1) of Regulation (EU) 2019/1150, and to provide the media service provider with an opportunity to reply to the statement of reasons within an appropriate period prior to the restriction or suspension taking effect. If following, or in the absence of, such a reply, the provider of a very large online platform still intends to restrict or suspend the provision of its online</p>	<p>services in relation to a <u>media service by a recognised media service provider because that media service</u> is incompatible with its terms and conditions, <u>it shall, without prejudice to the mitigating measures in relation</u> to a systemic risk referred to in Article <u>34 of</u> Regulation (EU) <u>2022/2065, communicate to that recognised media service provider the reasons accompanying that decision, specifying the specific clause in the terms and conditions with which the media service was incompatible, as required by Article 4(1) of</u> Regulation (EU) <u>2019/1150 and Article 17(3) of</u> Regulation (EU) <u>2022/2065.</u> <u>The provider of the very large online platform shall give the recognised media service provider the opportunity to respond to the reasons accompanying its decision within 24 hours</u> prior to the suspension <u>or restriction</u> taking effect.</p>
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NEWS MEDIA EUROPE

		<p><u>The provider of the very large online platform shall give the recognised media service provider the opportunity to respond to the reasons accompanying its decision within 24 hours</u> prior to the suspension <u>or restriction</u> taking effect.</p>	<p>intermediation services, it shall inform the media service provider concerned.</p>	
Article 17(2a)				
216a		<p><u>2a. Where, following the 24-hour period referred to in paragraph 2, the second subparagraph, and after due consideration of the response of the recognised media service provider, the provider of the very large online platform considers the media service concerned to be incompatible with its terms and conditions, it may refer the case to the relevant competent national regulatory authority or body or the body of the relevant self-regulatory or co-regulatory mechanism. The relevant competent national regulatory authority or body or the representative of the relevant self-regulatory or co-regulatory mechanism shall decide, without delay, whether the intended suspension or restriction is justified</u></p>		<p>Supporting the EP wording</p> <p><u>2a. Where, following the 24-hour period referred to in paragraph 2, the second subparagraph, and after due consideration of the response of the recognised media service provider, the provider of the very large online platform considers the media service concerned to be incompatible with its terms and conditions, it may refer the case to the relevant competent national regulatory authority or body or the body of the relevant self-regulatory or co-regulatory mechanism. The relevant competent national regulatory authority or body or the representative of the relevant self-regulatory or co-regulatory mechanism shall decide, without delay, whether the intended</u></p>

NEWS MEDIA EUROPE

		<i><u>in view of the specific clause in the terms and conditions of the provider of the very large online platform, taking into account fundamental freedoms.</u></i>		<i><u>suspension or restriction is justified in view of the specific clause in the terms and conditions of the provider of the very large online platform, taking into account fundamental freedoms.</u></i>
Article 17(3)				
217	3. Providers of very large online platforms shall take all the necessary technical and organisational measures to ensure that complaints under Article 11 of Regulation (EU) 2019/1150 by media service providers that submitted a declaration pursuant to paragraph 1 of this Article are processed and decided upon with priority and without undue delay.	3. Providers of very large online platforms shall take all the necessary technical and organisational measures to ensure that complaints under Article 11 of Regulation (EU) 2019/1150 <u>or Article 20 of Regulation (EU) 2022/2065 by recognised</u> by media service providers that submitted a declaration pursuant to paragraph 1 of this Article are processed and decided upon with priority and without undue delay <u>are processed and decided upon with priority and, in any event, no later than 24 hours after submission of the complaint. The media service provider may be represented by a body in complaints procedures.</u>	3. Providers of very large online platforms shall take all the necessary technical and organisational measures to ensure that complaints under Article 11 of Regulation (EU) 2019/1150 by media service providers that submitted a declaration pursuant to paragraph 1 of this Article are processed and decided upon with priority and without undue delay.	Supporting EP wording 3. Providers of very large online platforms shall take all the necessary technical and organisational measures to ensure that complaints under Article 11 of Regulation (EU) 2019/1150 <u>or Article 20 of Regulation (EU) 2022/2065 by recognised</u> media service providers <u>are processed and decided upon with priority and, in any event, no later than 24 hours after submission of the complaint. The media service provider may be represented by a body in complaints procedures.</u>
Article 17(6a)	European Commission	European Parliament	Council	Suggested compromise
222a				Supporting EP wording:

NEWS MEDIA EUROPE

		<u>6a. This Article shall be without prejudice to the right of media service providers to effective judicial protection.</u>		<u>6a. This Article shall be without prejudice to the right of media service providers to effective judicial protection.</u>
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7. Media pluralism assessment and media mergers

Recital 44	European Commission	European Parliament	Council	Suggested compromise
54	(44) With a view to ensuring pluralistic media markets, the national authorities or bodies and the Board should take account of a set of criteria. In particular, impact on media pluralism should be considered, including notably the effect on the formation of public opinion, taking into account of the online environment. Concurrently, it should be considered whether other media outlets, providing different and alternative content, would still coexist in the given market(s) after the media market concentration in question. Assessment of safeguards for editorial independence should include the examination of potential risks of undue interference by the prospective owner, management or governance structure in the individual editorial decisions of the acquired or merged entity. The	(44) With a view to ensuring pluralistic media markets, the national authorities or bodies and the Board should take account of a set of criteria. In particular, impact on media pluralism should be considered, including notably the effect on the formation of public opinion, taking into account of the online environment. Concurrently, it should be considered whether other media outlets, providing different and alternative content, would still coexist in the given market(s) after the media market concentration in question. Assessment of safeguards for editorial independence should include the examination of potential risks of undue interference by the prospective owner, management or governance structure in the individual editorial decisions of the acquired or merged entity. The	(44) With a view to ensuring pluralistic media markets, the national authorities or bodies and the Board should take account of a set of criteria. In particular, the expected impact on media pluralism should be considered, including notably the effect on the formation of public opinion, taking into account of the online environment. Concurrently, it should be considered whether other media outlets, providing different and alternative content, would still coexist in the given market(s) after the media market concentration in question. Assessment of safeguards for editorial independence should include the examination of potential risks of undue interference by the prospective owner, management or governance structure in the individual editorial decisions of the	Supporting EP wording: 44) With a view to ensuring pluralistic media markets, the national authorities or bodies and the Board should take account of a set of criteria. In particular, impact on media pluralism should be considered, including notably the effect on the formation of public opinion, taking into account of the online environment. Concurrently, it should be considered whether other media outlets, providing different and alternative content, would still coexist in the given market(s) after the media market concentration in question. Assessment of safeguards for editorial independence should include

NEWS MEDIA EUROPE

	<p>existing or envisaged internal safeguards aimed at preserving independence of the individual editorial decisions within the media undertakings involved should also be taken into account. In assessing the potential impacts, the effects of the concentration in question on the economic sustainability of the entity or entities subject to the concentration should also be considered and whether, in the absence of the concentration, they would be economically sustainable, in the sense that they would be able in the medium term to continue to provide and further develop financially viable, adequately resourced and technologically adapted quality media services in the market.</p>	<p>existing or envisaged internal safeguards aimed at preserving independence of the individual editorial decisions within the media undertakings involved should also be taken into account. <u>Furthermore, the results of the Commission's annual rule of law reports presented in the chapters on press freedom and the risk assessment carried out annually by media monitoring exercises should be considered in determining the overall climate for media and the effects of the media market concentration in question over media pluralism and editorial independence.</u> In assessing the potential impacts, the effects of the concentration in question on the economic sustainability of the entity or entities subject to the concentration should also be considered and whether, in the absence of the concentration, they would be economically sustainable, in the sense that they would be able in the medium term to continue to provide and further develop financially viable, adequately resourced and technologically adapted quality media services in the market.</p>	<p>acquired or merged entity. The existing or envisaged internal safeguards aimed at preserving independence of the individual editorial decisions within the media undertakings involved should also be taken into account. In assessing the potential impacts, the effects of the concentration in question on the economic sustainability of the entity or entities subject to the concentration should also be considered and whether, in the absence of the concentration, they would be economically sustainable, in the sense that they would be able in the medium term to continue to provide and further develop financially viable, adequately resourced and technologically adapted quality media services in the market.</p>	<p>the examination of potential risks of undue interference by the prospective owner, management or governance structure in the editorial decisions of the acquired or merged entity. The existing or envisaged internal safeguards aimed at preserving independence of the editorial decisions within the media undertakings involved should also be taken into account. <u>Furthermore, the results of the Commission's annual rule of law reports presented in the chapters on press freedom and the risk assessment carried out annually by media monitoring exercises should be considered in determining the overall climate for media and the effects of the media market concentration in question over media pluralism and editorial independence.</u> In assessing the potential impacts, the effects of the concentration in question on the economic sustainability of the entity or entities subject to the concentration should also be considered and whether, in the absence of the concentration, they would be</p>
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NEWS MEDIA EUROPE

				economically sustainable, in the sense that they would be able in the medium term to continue to provide and further develop financially viable, adequately resourced and technologically adapted quality media services in the market.
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Article 2, first paragraph, point (13a)				
	European Commission	European Parliament	Council	Suggested compromise
91a		(13a) 'media pluralism' means a variety of voices, analyses and opinions in public discourse, including minority positions and opinions, disseminated in an unimpeded way by media service providers which are in the hands of many different owners, each independent from one another, across different media channels and media genres and the recognition of the co-existence of private commercial media service providers and public service media providers;		Rejecting EP definition

Article 21(1), first subparagraph				
	European Commission	European Parliament	Council	Suggested compromise
237				Supporting Commission's wording:

NEWS MEDIA EUROPE

	1. Member States shall provide, in their national legal systems, substantive and procedural rules which ensure an assessment of media market concentrations that could have a significant impact on media pluralism and editorial independence. These rules shall:	1. Member States shall provide, in their national legal systems law , substantive and procedural rules which ensure an assessment of media market concentrations that could have a significant an impact on media pluralism and editorial independence. These rules shall:	1. Member States shall provide, in their national legal systems law , substantive and procedural rules which ensure allow for an assessment of media market concentrations that could have a significant impact on media pluralism and editorial independence. These rules shall:	1. Member States shall provide, in their national legal systems, substantive and procedural rules which allow for an assessment of media market concentrations that could have a significant impact on media pluralism and editorial independence. These rules shall:
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Article 21(1), first subparagraph, point (da)				
241a		<u>(da) specify in advance a reasonable period of time by which the national regulatory authority or body conducting the assessment is to complete the assessment, taking into account the period of time required for the involvement of the Board, the Commission, or both, in accordance with paragraphs 4 and 5;</u>		Supporting EP wording: <u>da) specify in advance a reasonable period of time by which the national regulatory authority or body conducting the assessment is to complete the assessment, taking into account the period of time required for the involvement of the Board, the Commission, or both, in accordance with paragraphs 4 and 5;</u>

Article 21(2)	European Commission	European Parliament	Council	Suggested compromise
243	2. In the assessment referred to in paragraph 1, the following elements shall be taken into account:	2. In the assessment referred to in paragraph 1, the following elements shall, <u>in particular</u> , be taken into account:	2. In the assessment referred to in paragraph 1, the following elements shall be taken into account:	2. In the assessment referred to in paragraph 1, the following elements shall be taken into account:

NEWS MEDIA EUROPE

Article 21(2), point (b) European Commission	European Parliament	Council	Suggested compromise	
245	(b) the safeguards for editorial independence, including the impact of the concentration on the functioning of the editorial teams and the existence of measures by media service providers taken with a view to guaranteeing the independence of individual editorial decisions;	(b) the safeguards for editorial independence, including the impact of the concentration on the functioning of the editorial teams and the existence of measures by media service providers taken with a view to guaranteeing <u>ethical and professional standards and</u> the independence of individual editorial decisions;	(b) the safeguards for editorial independence, including the impact of the concentration on the functioning of the editorial teams and the existence of <u>measures</u> measures taken by media service providers taken with a view to guaranteeing the independence of individual editorial decisions;	Supporting Council's wording: (b) the safeguards for editorial independence, including <u>measures taken</u> by media service providers with a view to guaranteeing the independence of editorial decisions;

Article 21(2), point (ca) European Commission	European Parliament	Council	Suggested compromise
246a		<u>(ca) the results of the risk assessment carried out as part of the Commission's annual rule of law report and the Media Pluralism Monitor to identify, analyse and assess risks to media freedom and media pluralism in the Member States.</u>	Supporting EP wording: <u>(ca) the results of the risk assessment carried out as part of the Commission's annual rule of law report and the Media Pluralism Monitor to identify, analyse and assess risks to media freedom and media pluralism in the Member States.</u> Adding an amendment: <u>(da) take into account the media market in its entirety, including the online environment, very large online platforms and public service media</u>

NEWS MEDIA EUROPE

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Article 21(5)	European Commission	European Parliament	Council	Suggested compromise
249	5. Within 14 calendar days from the receipt of the consultation referred to in paragraph 4, the Board shall draw up an opinion on the draft national opinion or decision referred to it, taking account of the elements referred to in paragraph 2 and transmit that opinion to the consulting authority and the Commission.	5. Within 14 calendar days from the receipt of the consultation referred to in paragraph 4, the Board shall draw up an opinion on the draft national opinion or decision referred to it, taking account of the elements referred to in paragraph 2 and transmit that opinion to the consulting authority <u>or body</u> and the Commission.	5. Within 14 calendar days from the receipt of the consultation referred to in paragraph 4 the timelines to be established by the Board in its rules of procedure , the Board shall may draw up an opinion on the draft national assessment or draft national assessment or draft opinion or decision referred to it of the consulting national regulatory authority or body , taking account of the elements referred to in paragraph 2 and transmit that opinion to the consulting such authority or body and the Commission.	5. Within 14 calendar days from the receipt of the consultation referred to in paragraph 4, the Board may draw up an opinion on the draft national opinion or decision referred to it, taking account of the elements referred to in paragraph 2 and transmit that opinion to the consulting authority <u>or body</u> and the Commission.

8. Media mergers and the Board

Article 11a	European Commission	European Parliament	Council	Suggested compromise
158a		<u>Article 11a</u> <u>Expert Group to the Board</u>		<u>Article 11a</u> <u>Expert Group to the Board</u>
Article 11a, first paragraph				

NEWS MEDIA EUROPE

158b		<p><u>An Expert Group shall be established. The Expert Group shall consist of representatives from the media sector beyond the audiovisual media sector. The representatives of the Expert Groups shall be appointed in a transparent, objective and non-discriminatory manner.</u></p>		<p><u>An Expert Group shall be established. The Expert Group shall consist of representatives from the media sector beyond the audiovisual media sector. The representatives of the Expert Groups shall be appointed in a transparent, objective and non-discriminatory manner.</u></p>
Article 11a, second paragraph				
158c		<p><u>The Expert Group shall be composed of one or more representatives from the media sectors of each Member State, from European associations or from European organisations with expertise on media beyond the audiovisual media sector or one or more natural persons with expertise on media beyond the audiovisual media sector. Details on the full composition of the Expert Group shall be laid down in the Board's rules of procedure.</u></p>		<p><u>The Expert Group shall be composed of one or more representatives from the media sectors of each Member State, from European associations or from European organisations with expertise on media beyond the audiovisual media sector or one or more natural persons with expertise on media beyond the audiovisual media sector. Details on the full composition of the Expert Group shall be laid down in the Board's rules of procedure.</u></p>
Article 11a, third paragraph				
158d		<p><u>The Expert Group shall provide independent expertise, assistance and advice to the Board in carrying out its tasks on issues related to media freedom and pluralism.</u></p>		<p><u>The Expert Group shall provide independent expertise, assistance and advice to the Board in carrying out its tasks on issues related to media freedom and pluralism.</u></p>

NEWS MEDIA EUROPE

Article 11a, fourth paragraph				
158e		<u>The Expert Group may draft a recommendation, on its own initiative or on a request by the Board, Commission or the European Parliament, regarding the Board's work programme and the effective and consistent application of Chapter 3 of this Regulation. The Expert Group shall make such recommendations publicly available.</u>		<u>The Expert Group may draft a recommendation, on its own initiative or on a request by the Board, Commission or the European Parliament, regarding the Board's work programme and the effective and consistent application of Chapter 3 of this Regulation. The Expert Group shall make such recommendations publicly available</u>
Article 11a, fifth paragraph				
158f		<u>Where the Board deals with a matter beyond the audiovisual media sector or relating to the press, it shall consult the Expert Group.</u>		<u>Where the Board deals with a matter beyond the audiovisual media sector or relating to the press, it shall consult the Expert Group.</u>

Article 12, first paragraph, point (g) Commission		European Parliament	Council	Suggested compromise
172	(g) draw up opinions on draft national opinions or decisions assessing the impact on media pluralism and editorial independence of a notifiable media market concentration	(g) draw up opinions on draft national opinions or decisions assessing the impact on media pluralism and editorial independence of a notifiable media market concentration where such a	(g) draw up opinions on draft national opinions or decisions assessing the impact on media pluralism and editorial independence of a notifiable media market concentration where such a	Supporting Council's wording: (g) draw up opinions on:

NEWS MEDIA EUROPE

	where such a concentration may affect the functioning of the internal market, in accordance with Article 21(5) of this Regulation;	concentration may affect the functioning of the internal market , in accordance with Article 21(5) of this Regulation;	concentration may affect the functioning of the internal market , in accordance with Article 21(5) of this Regulation;	
Article 12(1), point (g)(i)				
172a			(i) national measures which are likely to significantly and adversely affect the operation of media service providers in the internal market, in accordance with Article 20(4) of this Regulation;	(i) national measures which are likely to significantly and adversely affect the operation of media service providers in the internal market, in accordance with Article 20(4) of this Regulation;

Article 22a	European Commission	European Parliament	Council	Suggested compromise
254a		<u>Article 22a</u> <u>Delegated acts</u>		Rejecting EP wording.
Article 22a(1)				
254b		<u>1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.</u>		

9. Audience measurement

NEWS MEDIA EUROPE

Article 23	European Commission	European Parliament	Council	Suggested compromise
Article 23(1)				
257	<p>1. Audience measurement systems and methodologies shall comply with principles of transparency, impartiality, inclusiveness, proportionality, non-discrimination and verifiability.</p>	<p>1. Audience measurement systems and methodologies shall comply with principles of transparency, impartiality, inclusiveness, proportionality, non-discrimination, <u>comparability</u> and verifiability. <u>Audience measurement shall be conducted in accordance with self-regulatory mechanisms jointly agreed and widely accepted within the media industry.</u></p>	<p>1. Providers of audience measurement systems and methodologies shall ensure that their systems and methodologies comply with the principles of transparency, impartiality, inclusiveness, proportionality, non-discrimination and verifiability.</p>	<p>Supporting EP wording:</p> <p>1. Audience measurement systems and methodologies shall comply with principles of transparency, impartiality, inclusiveness, proportionality, non-discrimination, <u>comparability</u> and verifiability. <u>Audience measurement shall be conducted in accordance with self-regulatory mechanisms jointly agreed and widely accepted within the media industry.</u></p>
Article 23(2)				
258	<p>2. Without prejudice to the protection of undertakings' business secrets, providers of proprietary audience measurement systems shall provide, without undue delay and free of costs, to media service providers and advertisers, as well as to third parties authorised by media service providers and advertisers, accurate, detailed, comprehensive, intelligible and up-to-date information on the methodology used by their audience</p>	<p>2. Without prejudice to the protection of undertakings' business<u>trade</u> secrets <u>as defined in Article 2, point (1), of Directive (EU) 2016/943</u>, providers of proprietary audience measurement systems shall provide, without undue delay and free of costs, to media service providers, and advertisers, as well as to third parties authorised by media service providers and advertisers, accurate, detailed, comprehensive, intelligible and up-to-date</p>	<p>2. Without prejudice to the protection of undertakings' business secrets, providers of proprietary audience measurement systems developed outside relevant self-regulatory organisations or whose methodologies do not comply with standards and best practices agreed by the industry shall provide, without undue delay and free of costs, to media service providers and advertisers, as well as to third parties authorised by media service</p>	<p>Supporting Council's wording:</p> <p>2. Without prejudice to the protection of undertakings' business secrets, providers of proprietary audience measurement systems developed outside relevant self-regulatory organisations or whose methodologies do not comply with standards and best practices agreed by the industry shall provide, without undue</p>

NEWS MEDIA EUROPE

	<p>measurement systems. This provision shall not affect the Union's data protection and privacy rules.</p>	<p>information on the methodology used by their audience measurement systems. <u>Providers of proprietary audience measurement systems shall provide free of charge to each media service provider the audience measurements relating to its content and services. An independent body shall audit once a year the methodology used by proprietary audience measurement systems and the application of that methodology.</u> This provision shall not affect the Union's data protection and privacy rules.</p>	<p>providers and advertisers, accurate, detailed, comprehensive, intelligible and up-to-date information on the methodology used by their audience measurement systems. This provision shall not affect the Union's data protection and privacy rules.</p>	<p>delay and free of costs, to media service providers and advertisers, as well as to third parties authorised by media service providers and advertisers, accurate, detailed, comprehensive, intelligible and up-to-date information on the methodology used by their audience measurement systems. This provision shall not affect the Union's data protection and privacy rules.</p>
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Article 23(3)	European Commission	European Parliament	Council	Suggested compromise
259	<p>3. National regulatory authorities or bodies shall encourage the drawing up of codes of conduct by providers of audience measurement systems, together with media service providers, their representative organisations and any other interested parties, that are intended to contribute to compliance with the principles referred to in paragraph 1, including by promoting independent and transparent audits.</p>	<p>3. National regulatory authorities or bodies shall encourage the drawing up of codes of conduct by Providers of audience measurement systems, together with media service providers, their representative organisations, <u>online platforms</u> and any other interested parties, <u>shall draw up codes of conduct, with the support of national regulatory authorities or bodies,</u> that are intended to contribute to compliance with the principles referred to in paragraph 1, including by promoting</p>	<p>3. National regulatory authorities or bodies shall encourage the drawing up of codes of conduct by providers of audience measurement systems, together with media service providers, providers of online platforms, their respective representative organisations and any other interested parties, that encourage adherence with existing codes of conduct by these entities. Such codes of conduct shall be intended to contribute to compliance with the principles</p>	<p>Amending EP wording:</p> <p>3. Providers of audience measurement systems, together with media service providers, their representative organisations, <u>online platforms</u> and any other interested parties, shall draw up codes of conduct, with the support of national regulatory authorities or bodies, that are intended to contribute to compliance with the principles referred to in paragraph 1, including by promoting independent and transparent</p>

NEWS MEDIA EUROPE

		independent and transparent audits. <u>Such codes of conduct shall provide for the regular, transparent and independent monitoring and evaluation of the achievement of compliance with the principles referred to in paragraph 1. When drawing up codes of conduct, special consideration shall be given to small media in order to ensure that their audiences are properly measured.</u>	referred to in paragraph 1, including by promoting independent and transparent audits.	audits. Such codes of conduct shall provide for the regular, transparent and independent monitoring and evaluation of the achievement of compliance with the principles referred to in paragraph 1. When drawing up codes of conduct, special consideration shall be given to local media in order to ensure that their audiences are properly measured.
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10. State advertising

Article 24	European Commission	European Parliament	Council	Suggested compromise
Article 24(1)				
263	1. Public funds or any other consideration or advantage granted by public authorities to media service providers for the purposes of advertising shall be awarded according to transparent, objective, proportionate and non-discriminatory criteria and through open, proportionate and non-discriminatory procedures. This Article shall not affect public procurement rules.	1. Public funds or any other consideration or advantage granted <u>allocated</u> by public authorities to media service providers, <u>providers of online platforms and providers of online search engines</u> for the purposes of advertising <u>and purchases</u> shall be awarded according to transparent, objective, proportionate and non-discriminatory criteria and through open, proportionate and non-discriminatory procedures. <u>Such public funding allocated for the purposes of advertising to a singular</u>	1. Public funds or any other consideration or advantage granted <u>made available, directly or indirectly</u> , by public authorities or entities to media service providers for the purposes of state advertising shall be awarded according to transparent, objective, proportionate and non-discriminatory criteria and through open, proportionate and non-discriminatory procedures. The award of supply or service contracts by public authorities or entities to media service providers shall be based on transparent, open,	Amending EP wording: 1. Public funds or any other consideration or advantage <u>allocated</u> by public authorities to media service providers, <u>providers of online platforms and providers of online search engines</u> for the purposes of advertising <u>and purchases</u> shall be awarded according to transparent, objective, proportionate and non-discriminatory criteria and through open, proportionate and non-discriminatory procedures. [deletion of the 15% cap]

NEWS MEDIA EUROPE

		<p>media service provider, including to an online platform provider or to an online search engine provider, shall not exceed 15 % of the total budget allocated by the public authority to the totality of media service providers operating at national level. This Article shall not affect public procurement <u>rules or the application of State aid</u> rules.</p>	<p>proportionate and non-discriminatory procedures. This Article shall not affect the awarding of public contracts and concession contracts under Union public procurement rules or the application of Union state aid rules.</p>	<p>This Article shall not affect public procurement <u>rules or the application of State aid</u> rules.</p>
Article 24(2)				
264	<p>2. Public authorities, including national, federal or regional governments, regulatory authorities or bodies, as well as state-owned enterprises or other state-controlled entities at the national or regional level, or local governments of territorial entities of more than 1 million inhabitants, shall make publicly available accurate, comprehensive, intelligible, detailed and yearly information about their advertising expenditure allocated to media service providers, which shall include at least the following details:</p>	<p>2. Public authorities, including <u>at Union</u>, national, federal, <u>regional, or local level</u> or regional governments, <u>national</u> regulatory authorities or bodies, as well as state-owned enterprises or other state-controlled entities at the <u>Union</u> national or, regional level, or local governments of territorial entities of more than 1 million inhabitants, shall make publicly available <u>level, shall make publicly available by electronic and user-friendly means</u> accurate, comprehensive, intelligible, detailed and yearly information about their advertising expenditure <u>and purchase expenditures</u> allocated to media service providers, <u>providers of online platforms and providers of online</u></p>	<p>2. Public authorities, including national, federal or regional governments, regulatory authorities or bodies, as well as state-owned enterprises or other state-controlled or entities at the national or regional level, or local governments of territorial entities of more than 1 million inhabitants, shall make publicly available accurate, comprehensive, intelligible, detailed and yearly information about their state advertising expenditure allocated to media service providers, which shall include at least the following details:</p>	<p>Supporting EP wording:</p> <p>2. Public authorities, including <u>at Union</u>, national, federal, <u>regional, or local level</u> <u>national</u> regulatory authorities or bodies, as well as state-owned enterprises or other state-controlled entities at the <u>Union</u> national, regional, or local <u>level, shall make publicly available by electronic and user-friendly means</u> accurate, comprehensive, intelligible, detailed and yearly information about their advertising <u>and purchase expenditures</u> allocated to media service providers, <u>providers of online platforms and providers of online search engines</u>, which shall include at least the following details:</p>

NEWS MEDIA EUROPE

		<u>search engines</u> , which shall include at least the following details:		
Article 24(2), point (a)				
265	(a) the legal names of media service providers from which advertising services were purchased;	(a) the legal names of media service providers, <u>providers of online platforms or providers of online search engines</u> from which advertising services <u>and purchases were obtained</u> were purchased ;	(a) the legal names of media service providers from which advertising services were purchased;	(a) the legal names of media service providers, <u>providers of online platforms or providers of online search engines</u> from which advertising services <u>and purchases were obtained</u> ;
Article 24(2), point (aa)				
265a		<u>(aa) a short reasoning of the criteria and procedures applied for the allocation of public funds for the purposes of State advertising and purchases to media service providers, providers of online platforms or providers of online search engines;</u>		<u>(aa) a short reasoning of the criteria and procedures applied for the allocation of public funds for the purposes of State advertising and purchases to media service providers, providers of online platforms or providers of online search engines;</u>