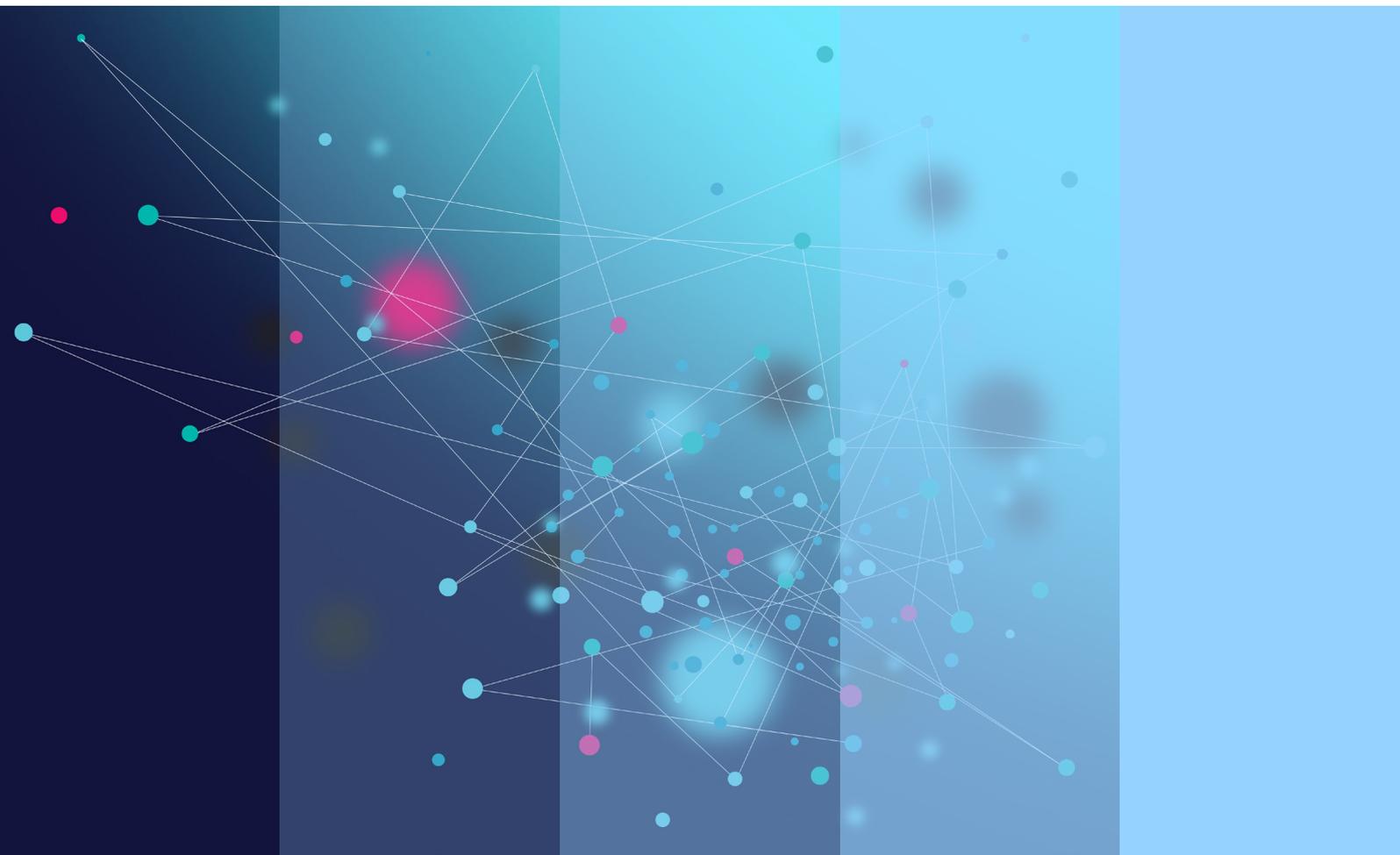


A new digital framework for Europe

Key points from nordic public service media on The Digital Services Act





The seven Nordic Public Service media companies call for an improved balance in digital markets and welcome the commitment to strengthening principles for online trust. We are keen to ensure that content and services from independent and trustworthy media continue to reach audiences on digital platforms without undue interference by third parties, while mitigating risks of overregulation in relation to freedom of speech. We hope the new Digital Services Act (DSA) will help to support this.

About the Nordic Public Service Media Companies

Nordic public service media (Nordic PSM) play a vital democratic role across our region. Building on our public service remits, we provide content that can help meet the democratic, social and cultural needs of our audience. We do this as part of an independent and diverse media environment that promotes societal participation and an informed public. This matters more than ever at times of crisis such as this. Citizens are turning in even greater numbers to PSM for reliable and trustworthy news and information. Our reporting helps the public to understand unfolding events. We provide entertainment and content that brings communities together, as well as ensure that the joys of culture and learning are available to everybody. Nordic PSM enjoy some of the highest levels of trust throughout the EU¹. Together, we strive to be world class competitive by investing billions of euros every year in content and unique journalistic stories, with a vast majority of Nordic or European origin.

Today, we operate in an era of increased online disinformation and hate speech. We are worried this can have far-reaching consequences for the general democratic debate and want to be part of the discussion on possible solutions. Nordic PSM are, furthermore, in a constant state of digital transformation. We play an important role in meeting these challenges, by continuously raising the quality of our content and services and by embracing new digital opportunities and flexible forms of distribution. While we adapt quickly to the changing environment, our role nevertheless builds on enduring, universal values: legitimacy, independence and trust from our audiences. These are at the heart of everything we do.

1) Media Trust Index. Eurobarometer.



1. Editorial independence is crucial to ensure trust

Guided by strict national and European rules as well as journalistic and editorial principles, the cornerstone of independent PSM is exercising full editorial responsibility over our content. Public trust is built on maintaining this independence. That is why, when digital platforms and social networks are used to make independent content of societal general interest available to audiences, such content should never be subject to any undue form of secondary control or removal.

- The anticipated Digital Services Act must safeguard freedom of expression and freedom of the press. It is crucial that any provisions on platforms' liability do not lead to platforms exercising editorial control over content made available by independent PSM (i.e. take-down or modification). This applies equally to content from other independent media, ie. independent providers of content of societal general interest already subject to specific regulation and enforcement. In fact, the view of Nordic PSM is that the DSA should establish safeguards which prevent platforms from applying additional or secondary control over such content. This should include removal or modification based on platforms' community standards.
 - The anticipated reform of the liability regime within the Digital Services Act should be strictly limited to cover illegal content only, as determined by national law.
 - Defining content of societal general interest and enforcement should be within the competence of EU members states. The definition of independent media must above all relate to independence from political influence over editorial decision-making.
 - Sector-specific regulation should prevail over the horizontal Digital Services Act.
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2. Attribution, prominence and data are means to emphasise freedom of expression, pluralism and trust

Independent media can help to increase levels of political knowledge, understanding and even participation. To do so, however, the audience needs to be able to find and engage with the content offered. Digital platforms have become important way of reaching audiences, and recent years have seen a significant development in the role platforms play in this regard. New ways of distributing content have stimulated innovation and led to exciting opportunities for audiences and creators. We want to operate with, and alongside digital intermediaries and social networks based on level conditions and business relations. However, when platforms control if and how content is discovered, through for example community standards, notice-and-action procedures, ranking and recommendation algorithms, it can have far-reaching consequences for the exercise of freedom of expression and pluralism. If content of societal general interest gets harder to find and to identify by brand, consumers risk losing out on the content they trust and rely on.

- We support regulation that guarantees the prominence of content of societal general interest on digital services and platforms and ensures proper and clear attribution of brand to the media company. Clear attribution is important for the audience's ability to identify trustworthy sources, and in turn support the objective of informed citizens.
 - Easy access to, and findability of, independent media content of societal general interest must be guaranteed on digital services and platforms.
 - Media need access to/return of non-privacy data in a usable form that is generated from making their content available on third party platforms, in line with data protection and privacy rules. This ensures further innovation and enhancement of services for the long-term benefit of audiences.
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3.

Media freedom, pluralism and safety of journalists underpin european democracy

The Nordic PSM companies are eager to continue developing their content and services in line with the obligation to serve audiences where, how and when they want to engage with us. Our goal as PSM companies is to ensure that content of public value remains widely available, is easily accessed and enjoyed by audiences, and that it is able to play a continued role in stimulating fundamental rights and in supporting media pluralism. In an ever-changing media landscape, media and information literacy (MIL) competencies are crucial. PSM help to increase levels of societal knowledge and participation and play a key role in strengthening societal resistance to manipulation, rumors and disinformation. Not only by trustworthy and reliable content, but through transparency in relation to journalistic and production methods.

- Media freedom and pluralism are at the heart of European democracy. Any new legislation at European level must be consistent with, and respect the principles of media freedom, freedom of speech and support pluralism in Europe.
 - Media and information literacy are essential means of tackling disinformation and increasing levels of digital literacy in Europe.
 - One essential means of fighting disinformation is to ensure effective prominence of independent content of societal general interest, as recognized by the AVMS Directive, and to protect quality journalism from any form of threats to independence.
 - Journalists need to be able to do their work free of pressure and intimidation. Digital services and social networks should have a duty of care, to ensure that journalists are able to operate on their platforms, and feel free to carry out their work to the highest standards.
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