

Consultation Document: Media Pluralism Policy

Publication date: 1 September 2025 Deadline for response: 24 October 2025

This document contains a public consultation on Coimisiún na Meán's draft **Media Pluralism Policy**.

The Policy is intended to provide clarity to all interested parties on Coimisiún na Meán's understanding of media pluralism, and how media pluralism will guide the activities of the organisation.

Media pluralism means a **diversity** in media **ownership**, media **services**, media **content**, and **exposure** to media.

Coimisiún na Meán welcomes the views of any interested person or organisation on the contents of its **draft Media Pluralism Policy**.

You can submit your views in general, or respond to the specific questions in section 3.2. of this document.

You can find information on how we use your personal data in <u>section 3.5 of this</u> <u>document</u>.

You can respond to the consultation:

- by email, to consultation@cnam.ie;
- by post, to:

 Coimisiún na Meán
 1 Shelbourne Buildings
 Shelbourne Road
 Dublin 4, D04 NP20, Ireland

You may wish to refer to Coimisiún na Meán's **Consultation Guidelines** when making your submission.

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1. Summary

Coimisiún na Meán ("An Coimisiún") is Ireland's independent agency for developing and regulating a thriving, diverse, creative, safe, and trusted media landscape.

An Coimisiún has a number of powers, functions, and responsibilities to uphold freedom of expression and ensure pluralism of the media.

Media pluralism is an established concept in human rights frameworks, linked to the right to freedom of expression. Free and pluralistic media are recognised as pillars of modern democracy, allowing for the flow of information and the possibility to hold power to account.

The legal framework under which An Coimisiún operates in regulating and supporting media and online services provides it with a range of tools for media pluralism, including:

- the Broadcasting Act 2009 as amended (the "2009 Act"), providing for the establishment of An Coimisiún and granting it a range of functions and powers,
- the Competition Act 2002 as amended (the "2002 Act"), which requires An Coimisiún to conduct research in relation to media pluralism and to assess media mergers,
- the Audiovisual Media Services Directive (the "AVMSD"), setting out a framework for the regulation of audiovisual media services,
- the Digital Services Act (the "**DSA**"), to ensure a safe, predictable, and trustworthy online environment, and
- the European Media Freedom Act ("EMFA"), to safeguard media pluralism and editorial independence.

An Coimisiún is publishing its Media Pluralism Policy to provide clarity to all interested parties on its understanding of media pluralism, and how media pluralism will guide the activities of the organisation.

Media pluralism means a **diversity** in media **ownership**, media **services**, media **content**, and **exposure** to media.

Coimisiún na Meán welcomes the views of any interested person or organisation on the contents of its **draft Media Pluralism Policy**. You can submit your views in general or respond to the specific questions in section 3.2. of this document.

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2. Introduction and background

2.1. Coimisiún na Meán

An Coimisiún is Ireland's agency for developing and regulating a thriving, diverse, creative, safe and trusted media landscape. It was established on 15 March 2023.

An Coimisiún is obliged to ensure that:

- The democratic values enshrined in the Constitution are upheld;
- The interests of the public are protected;
- Broadcasting and audiovisual on-demand media services available in the State are open, inclusive, and pluralistic;
- Regulatory arrangements consider technological and societal change;
- High-quality, diverse, and innovative programmes are provided;
- There is diversity and transparency in the control of communications media operating in the State;
- Media literacy is promoted through research and education; and
- The regulatory environment sustains independent and impartial journalism.

An Coimisiún's <u>Strategy Statement 2025 – 2027</u> (the "**Strategy**") sets out its **mission** to regulate, support, and develop a media landscape that fosters a democratic and pluralistic society. Media pluralism is core to the achievement of the **strategic outcomes** outlined in the Strategy, including:

- the lawful expression of a wide variety of views, and enabling people in their diversity to express their lawful views, and be their individual, authentic selves in all forms of media;
- an Irish media sector that is accessible, inclusive, diverse, and representative of contemporary Ireland:
- diversity of media ownership and a plurality of production, distribution, and delivery channels;
- the production by public service media organisations of valued and consumed content; and
- people seeking out, identifying and consuming content from trusted sources of information.

2.2. What is media pluralism?

In Europe, Article 11 of the Charter of Fundamental Rights of the European Union ("**CFREU**") establishes the right to freedom of expression, including the freedom to hold opinions and to receive and impart information and ideas, without interference and regardless of frontiers. Article 11 also provides that the freedom and pluralism of the media shall be respected.

In Ireland, the 2002 Act sets out that "plurality of the media" means "diversity of ownership and content". In its proposed Media Pluralism Policy, An Coimisiún states that it considers media pluralism to be made up of a diversity of ownership, services, content, and exposure.

2.3. Why is An Coimisiún publishing a Media Pluralism Policy?

The Broadcasting Authority of Ireland ("**BAI**"), An Coimisiún's predecessor organisation, published its <u>Media Plurality Policy</u> in 2019. The media landscape has continued to evolve since publication, with a number of developments in the Irish and European media and regulatory landscapes occurring, including:

- The enactment of the Online Safety and Media Regulation Act 2022, amending the Broadcasting Act 2009, and establishing Coimisiún na Meán;
- The entry into force of the Digital Services Act in 2022;



- The publication of the final report of the Future of Media Commission in 2022, and the Future of Media Commission Implementation Strategy and Action Plan in 2023;
- The entry into force of the European Media Freedom Act in 2023;
- The publication of An Coimisiún's Strategy Statement 2025 2027; and
- Further developments in media market shares, audience shares, news consumption and other audience and user habits, information behaviours, editorial decision-making, content production and dissemination, and supports for journalism.

In light of the changing environment at such a scale and pace, An Coimisiún has reconsidered what media pluralism means in concrete terms, and its Media Pluralism Policy aims to:

- Set out a definition of media pluralism that reflects the current media and regulatory landscape;
- Advance aims and objectives for the safeguarding and promotion of media pluralism in Ireland;
- Accurately inform all interested parties of An Coimisiún's current and future role in safeguarding and promoting media pluralism in Ireland; and
- Serve as a unified framework for An Coimisiún to articulate its understanding of, and shape its activities relating to, media pluralism.

As part of the process of developing the proposed Policy, we have reflected on our functions and powers within a changing media landscape, consulted internal and external stakeholders, and completed a review of relevant legislation, policy, and other sources of evidence to identify themes and issues in media pluralism. We now wish to consult with the public to gather your views.



3. Consultation

You may wish to refer to Coimisiún na Meán's Consultation Guidelines when making your submission.

3.1. Media Pluralism Policy

The text of the proposed Media Pluralism Policy is available here: Media Pluralism Policy.

The Policy:

- Sets out the role of An Coimisiún;
- · Provides a definition of media pluralism;
- Describes the role and purpose of the Policy, and how the Policy will be used;
- Describes the importance of media pluralism, and risks and challenges facing media pluralism;
- Establishes a vision and objectives for An Coimisiún in supporting and safeguarding media pluralism; and
- Establishes outcome areas and indicators, providing a basis An Coimisiún to evaluate its impact and measure media pluralism.

Subject to the public consultation process, An Coimisiún will develop plans for the implementation of the Policy in order to measure media pluralism and the impact of An Coimisiún's activity on pluralism.

3.2. Consultation questions

You may submit your views on the text of the Policy in general terms, or respond to the specific questions below. You do not have to respond to all or any of the questions outlined.

Q1: Do you have any views on the **role of Coimisiún na Meán** in supporting and safeguarding media pluralism, either in general or with reference to the description in the draft Policy? Are there particular parts of Coimisiún na Meán's role that are more important than others?

Q2: Do you have any views on the **definition of media pluralism** provided in the draft Policy? Are there other elements to a definition of media pluralism that Coimisiún na Meán should consider?

Q3: Do you have any views on the importance of media pluralism as described in the draft Policy?

Q4: Do you have any views on the **risks and challenges to media pluralism** outlined in the draft Policy? Are they adequately captured? Are there other risks and challenges Coimisiún na Meán should consider?

Q5: Do you have any views on the vision and objectives set out in the draft Policy?

Q6: Do you have any views on the **outcome areas** outlined in the draft Policy? Are there other areas Coimisiún na Meán should aim to impact?

Q7: Do you have any views on the **indicators** outlined in the draft Policy? Are they adequately captured? Are there other indicators and/or sources of data and information Coimisiún na Meán should consider?



Q8: Do you have any views on how Coimisiún na Meán should implement the draft Policy?

3.3. How to respond

You can respond to this consultation:

- By email, to consultation@cnam.ie; or
- By **post**, to:

Coimisiún na Meán 1 Shelbourne Buildings Shelbourne Road Dublin 4, D04 NP20, Ireland

If you require any assistance with making a response, please contact Coimisiún na Meán:

- By email, to <u>consultation@cnam.ie</u>;
- By phone, at 01 644 1200; or
- By **post**, to:

Coimisiún na Meán 1 Shelbourne Buildings Shelbourne Road Dublin 4, D04 NP20, Ireland

Coimisiún na Meán will normally consider written responses only and will not give respondents an opportunity to make submissions in other formats.

3.4. Timeframe for response

The consultation period ends at 17:00 on Friday, 24 October 2025.

3.5. Use of information

3.5.1. Publication of submissions

It is Coimisiún na Meán's policy to publish all submissions to public consultations.

Submissions should be provided as non-confidential documents, with any information over which confidentiality is claimed (e.g. commercially sensitive information) supplied in a separate annex.

Alternatively, a redacted, non-confidential version may be submitted along with the confidential version. Any documents marked confidential in this manner will not be published.

However, Coimisiún na Meán will not be liable for any document that is subsequently disclosed pursuant to a request under the Freedom of Information Act 2014 or otherwise in accordance with law.

3.5.2. Consultation report

Coimisiún na Meán will take account of the submissions made. However, it should be noted that the process is not equivalent to a voting exercise on proposals and Coimisiún na Meán will exercise its



judgment having considered the submissions made. Coimisiún na Meán will form its own views independently of the views of any particular consultees.

Coimisiún na Meán will publish a consultation report following each consultation process. It is recognised that there may be a wide range of stakeholders on any particular issue. Coimisiún na Meán will set out the key issues emerging and the main points taken on board, as well as the main points that could not be taken on board for practical, legal or policy reasons. Coimisiún na Meán may decide to adopt the measure consulted on, with or without amendment.

3.5.3. Personal data

Coimisiún na Meán will comply with its obligations under the General Data Protection Regulation ("GDPR"), the Data Protection Act 2018 and any other applicable data privacy laws and regulations. An Coimisiún is obligated and committed to protecting all personal data submitted. Coimisiún na Meán has an appointed Data Protection Officer who is registered with the Data Protection Commission. You can find out more on how Coimisiún na Meán processes personal information in our published policy.

As part of the consultation process, the name of the respondent to the consultation and the response provided will be made publicly available. However, Coimisiún na Meán will not make publicly available your contact details, such as your address, phone number or email. The information collected will be used only for the purposes of this consultation process and where lawfully permitted.

3.5.4. Freedom of information

Information held by Coimisiún na Meán is subject to its obligations under law, including under the Freedom of Information Act 2014. We will consult you about information you mark as confidential before deciding on any request made under the Freedom of Information Act, 2014

