

Response to Consultation: Media Pluralism Policy

This document contains Coimisiún na Meán's response to its [public consultation on a draft Media Pluralism Policy](#).

The public consultation opened on 1 September 2025 and closed on 24 October 2025.

Twelve (12) submissions to the public consultation were received.

Coimisiún na Meán has considered the submissions made. With due regard to the submissions as a whole, Coimisiún na Meán has exercised its judgement and formed its views on the Media Pluralism Policy.

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1. Introduction and background

Coimisiún na Meán (“**An Coimisiún**”) is Ireland’s independent agency for developing and regulating a thriving, diverse, creative, safe, and trusted media landscape. It was established on 15 March 2023.

On 1 September 2025, An Coimisiún published its [public consultation on a draft Media Pluralism Policy](#), and invited submissions until 24 October 2025.

An Coimisiún received 12 submissions to its consultation from the public, media service providers, online platform providers, representative associations, and academia.

[Copies of the submissions received](#) have been published separately.

Purpose of the response to consultation

In accordance with the [Consultation Guidelines](#) published by An Coimisiún, this response to consultation is published following An Coimisiún’s public consultation process.

An Coimisiún has considered the submissions made. With due regard to the submissions as a whole, An Coimisiún has exercised its judgement and formed its views on the Media Pluralism Policy.

The response to consultation sets out the key issues emerging from the consultation, and summarises how the final Media Pluralism Policy takes account of certain issues raised during the consultation. In view of the range of submissions received, the response to consultation is not intended to be exhaustive. The failure to refer to any specific issue should not be taken as failure on the part of An Coimisiún to have regard to any particular submissions or the submissions as a whole.

An Coimisiún reserves the right, in the exercise of its discretion, to adopt and publish materials or measures on which it has consulted, with or without amendment.

This document outlines changes made in respect of the Media Pluralism Policy, of which the draft was published on 1 September 2025.



2. Media Pluralism Policy

The final [Media Pluralism Policy](#) has been adopted and published by An Coimisiún.

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

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.

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.

An Coimisiún's [Strategy Statement 2025 – 2027](#) (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.

The **Media Pluralism Policy**:

- Sets out the role of An Coimisiún;
- 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.

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



Next steps

An Coimisiún, in line with the indicators set out in the final Policy, will now commence the development of a framework to measure media pluralism. The aim is to establish an evidence base on which An Coimisiún can take appropriate and targeted action.

This process will explore, in further detail:

- what types of information and data can be collected and analysed,
- the inferences that can be made from the collected information and data,
- any findings in relation to the state of media pluralism,
- how these findings can inform whether An Coimisiún is achieving impact in the Policy's outcome areas, and, more broadly, for the organisation's Strategy, and
- how An Coimisiún can act on these findings to promote and safeguard media pluralism.

This process is intended to be collaborative insofar as is possible, and An Coimisiún anticipates stakeholder engagement to ensure its measurement is efficient.

In measuring media pluralism, and in taking action on the basis of any measurement, An Coimisiún will have due regard to its regulatory remit and the principles of proportionality, consistency, and fairness.



3. Overview of consultation and Commission response

The role of Coimisiún na Meán

Overview of comments

While respondents welcomed the draft Policy and the role of An Coimisiún in media pluralism as outlined in the draft Policy, some suggested that elements of the draft Policy were not framed correctly. Some respondents called for stronger emphasis on the importance of media viability to media pluralism, in addition to stronger emphasis on the actions An Coimisiún would take to address the influence of online platforms on media pluralism and media viability.

In addition, some respondents submitted that there was a potential conflict or incoherence between the Policy and the regulatory framework, and cautioned against the potential to take action outside of the remit of An Coimisiún, or to take action that would amount to over-regulation, over-intervention, or would be incoherent with existing regulation and lead to fragmentation.

Some submissions focused on specific aspects of An Coimisiún's role in media pluralism, including media market concentrations and media mergers. Those focusing on media mergers requested that An Coimisiún, in considering its Policy, would revise its ownership and control rules.

An Coimisiún's response

An Coimisiún acknowledges the importance of media viability as underpinning media pluralism; the draft Policy now makes further specific references to this key dependency on viability in the text's sections on "The importance of media pluralism" and "Risks and challenges for media pluralism".

In relation to submissions concerning An Coimisiún's remit and scope of activity to be undertaken, An Coimisiún, in drafting the Policy, has had regard to its statutory remit and considers that it has appropriately represented its role in media pluralism in the final text of the Policy. In taking action further to the Policy, An Coimisiún must adhere to its remit, and will follow the principles of proportionality, consistency, and fairness in such actions. The introduction to the Policy now contains wording to indicate An Coimisiún's adherence to its remit and such principles.

In respect of market concentrations and media mergers, An Coimisiún may independently revise its rules around ownership and control for media services – but a review of the ownership thresholds, as specified in the Commission's current Ownership and Control Policy, do not form part of the development and publication of the Media Pluralism Policy.

What is media pluralism?

Overview of comments

Respondents largely welcomed An Coimisiún's proposed language in relation to elements contributing to media pluralism in the draft Policy. Specific calls for certain elements to be included were made, including in relation to the diversity of language, and increased reference to media viability.

Other submissions called for further clarity, including on the use of the term "media pluralism" as opposed to "media plurality", and an understanding of what "creating" media content means, including clarity on how the Policy would be applied in respect of individual content creators as opposed to media service providers.

An Coimisiún's response



The Policy reflects the need for media content to be responsive to and reflective of a diverse society – this incorporates linguistic diversity. An Coimisiún also notes that it has a statutory function to ensure that the broadcasting services and audiovisual on-demand media services available in the State are open, inclusive and pluralistic, and that the Commission's policies in relation to those services best serve the needs of the people of the island of Ireland, bearing in mind the diversity of the people of the island of Ireland, including their linguistic diversity.

In respect of the possibility for media viability to be included, An Coimisiún considers that it has appropriately referenced media viability throughout the text of the Policy, including on foot of changes made from the public consultation process – embedded in the importance of media pluralism, the risks and challenges to media pluralism, the Policy's outcome areas, and the Policy's indicators.

On the distinction between pluralism and plurality, An Coimisiún notes that it uses the term pluralism in line with the usage in the European Charter for Fundamental Rights, in addition to European legislation governing the provision of media and online services, including the Audiovisual Media Services Directive, the Digital Services Act, and the European Media Freedom Act.

In terms of the role of content creators, the use of the term “creators of media content” is intended to acknowledge the existence of actors in the media landscape who create media content. The Policy identifies the possibility of individuals creating content in line with An Coimisiún's Strategy Statement, which recognises that the public can consume and create content. It is also consistent with an understanding of the media landscape wherein individuals, such as journalists, influencers, or other content creators, can provide media services and content. An Coimisiún will have regard to its regulatory remit and the principles of proportionality, consistency, and fairness in its activities to support media pluralism, including in respect of the various actors in the media landscape.

Importance of media pluralism

Overview of comments

Respondents largely welcomed An Coimisiún's representation of the importance of media pluralism in the draft Policy.

Some submissions suggested that the Policy should emphasise the role of media in democratic societies, the importance of community and local media outlets, and the importance of the media itself to various aspects of society.

In addition, submissions Policy should indicate more strongly the dependency of the viability of media on financial and technological developments.

An Coimisiún's response

An Coimisiún notes the responses made, and has included additional wording in the sections of the Policy relating to “The importance of media pluralism” and “Risks and challenges to media pluralism”, so as to underscore the role of media in democratic societies, and underline the dependency of media pluralism on the viability of a range of media services and content. The Policy has also been changed to note that developments in legislation, policy, and technologies raise significant questions and issues for the viability and reach of media services and content.

Furthermore, Policy refers now to the European Commission's recently published European Democracy Shield, which emphasises the role of free and independent media in democracy.



Risks and challenges to media pluralism

Overview of comments

Respondents largely agreed with the risks and challenges for media pluralism identified in the draft Policy, but a number of submissions were made that requested that certain risks and challenges needed to be explicitly identified or reframed, including in relation to market concentration and digital advertising revenue concentration, the safety of journalists, levels of trust in media, threats to the provision of Irish language media, threats to public service media, the impact of online platforms and other technologies, and the need for media entities to engage with digital transformation.

An Coimisiún's response

An Coimisiún has disambiguated the issues of media market concentration from digital advertising revenue concentration. It has also now included the safety of journalists and levels of trust in media as specific risks and challenges for media pluralism.

An Coimisiún notes that the Policy is not intended to be an in-depth account of all risks and challenges in the media landscape, and considers that the text of the Policy, including the changes made, are broadly representative of the main risks and challenges to the landscape. The nuances and consequences of those risks and challenges, including any action An Coimisiún may take to address any or all of those, will be further explored and detailed in the implementation of the Policy.

Vision, objectives, outcome areas, and indicators

Overview of comments

Submissions largely welcomed the vision and objectives outlined in the draft Policy, with some considerations for achievement of these objectives in practice. Again, some submissions cautioned the potential for over-regulation or overextension of An Coimisiún's remit and activities. Some respondents called for varying prioritisation or framing of the objectives.

Respondents also welcomed the outcome areas, but pointed to a range of issues that could be taken into consideration to bolster these, including cross-border access to media content, further recognition of the structural challenges facing the media sector, an emphasis on participation and shared spaces in the media landscape, and the restatement of challenges faced by journalists.

In relation to the indicators, respondents agreed with the relevant factors as set out, but further clarification was sought in relation to the sources of information and data that would be used, the potential to overburden service providers in the event of further reporting, and on how the indicators would be used to achieve tangible change. Other respondents noted the potential for trade-offs between indicators, and that, in practice, the relative weighting and importance of indicators should be highlighted. Some respondents also pointed to the potential to explore the awareness of not only the public, but of relevant service providers, of certain matters. Respondents also requested collaboration would be undertaken on the development and assessment of indicators.

An Coimisiún's response

An Coimisiún has added wording to the text of the Policy to acknowledge the concept of shared spaces under the outcome area of "Inclusion", and now refers to the safe provision of news and current affairs content under the outcome area of "Journalism".



On respondents' submissions relating to over-regulation or overextension of An Coimisiún's remit, please refer to An Coimisiún's [response under "The role of Coimisiún na Meán"](#).

In relation to the indicators, An Coimisiún has made changes to the Policy to note that the indicators may interrelate and overlap, that the weighting and importance of indicators may change over time, and that there are a range of factors influencing how the indicators may appear in practice. An Coimisiún has also made changes to refer to information on relevant service providers' awareness and experience of regulatory or other matters.

On the topic of data and information sources generally, the Policy now clarifies that An Coimisiún will have regard to its statutory remit and the relevant legal provisions in respect of the collection and use of certain data and information.

Policy structure and implementation

Overview of comments

Respondents generally made submissions on the practical implementation of various parts of the Policy, including about how certain issues manifest, what changes should be made within the media landscape, and considerations that An Coimisiún should have when undertaking activity to promote and support media pluralism.

Some respondents raised questions around the implementation of the European Media Freedom Act by An Coimisiún, and called for An Coimisiún to ensure it fulfils its duties in this respect, including ensuring that recipients of media services have access to a plurality of editorially independent content.

An Coimisiún's response

An Coimisiún acknowledges the significant commentary on the implementation of the Policy and will take account of the matters raised as it works to develop a framework to measure media pluralism, and intends to collaborate with stakeholders in this respect. Please refer to the ["next steps" section of this document](#) for further detail.

In relation to the European Media Freedom Act, An Coimisiún notes that it was designated as the national regulatory authority for the European Media Freedom Act under a statutory instrument in February 2025. An Coimisiún is expecting forthcoming powers and functions via the implementation of the Broadcasting (Amendment) Bill and the Media Regulation Bill – these functions and powers are referenced at a high level in the text of the Policy, as is the right of recipients to media services. An Coimisiún has already been working to implement the parts of the European Media Freedom Act for which it has been made responsible to date, and An Coimisiún will implement any other functions or powers arising from the European Media Freedom Act as appropriate and as required.

