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Public Consultation on Media Pluralism

In response to the consultation on the Commission's Draft Media Pluralism Policy, Bauer Media Audio Ireland is happy to participate in the process and has detailed below a number of key areas that we view as important for consideration as part of the process.

We are happy to engage further as required.

Best Regards



Chris Doyle
CEO – Bauer Media Audio Ireland

Bauer Media Audio Ireland response to the public consultation conducted by Coimisiún na Meán on its Media Pluralism Policy

I. Introduction

This submission provides comments from Bauer Media Audio Ireland (“BMAI”) to the public consultation conducted by Coimisiún na Meán (“An Coimisiún”) on its Media Pluralism Policy (the “Policy”).¹

A brief description of BMAI

BMAI is the leading commercial radio broadcaster in Ireland, reaching over 2.2 million weekly listeners. It is home to some of Ireland’s best-loved commercial radio stations, including Today FM, Newstalk, SPIN, iRadio, Red FM, Beat and 98FM. BMAI also operates Off the Ball, a multiplatform sports media brand, as well as GoLoud, the one destination app for audio content, and audioXi, Ireland’s largest digital audio advertising exchange.

BMAI supplies a network of news services to the entire independent commercial radio sector reaching 2.6 million people daily, almost double the reach of the state broadcaster, RTÉ. BMAI employs close to 400 people and has directly raised over €1million for charitable causes over the last 3 years on top of supporting many more charities by subsidising advertising campaigns, in the Republic of Ireland.

BMAI is a division of Bauer Media Audio, a leading UK and European commercial radio broadcaster and digital audio operator.²

The focus of BMAI’s response

¹ Coimisiún na Meán (2025). Media Pluralism Policy (“Policy”). Available at: https://www.cnam.ie/app/uploads/2025/08/20250827_Media-Pluralism-Policy-PConsult.pdf.

² BMA’s broadcast radio, online services, and podcasts reach over 61 million weekly listeners across nine countries. Our radio brands include KISS, Mix Megapol, Absolute Radio, Radio Norge, Radio Expres, Radio Nova, The Voice and RMF. BMA is a division of Bauer Media Group, a privately owned media group headquartered in Hamburg, Germany. Bauer Media Group is also, among other things, a magazine publisher, with titles including Cosmopolitan, Empire, Car, Closer, Grazia and Take a Break.

The purpose of the Policy is to provide clarity to all interested parties on An Coimisiún's understanding of media pluralism, and how media pluralism will guide its activities.³ The time is ripe for this initiative.

Media markets have changed dramatically since the publication of the Broadcasting Authority of Ireland's 2019 Media Plurality Policy. Gatekeeper platforms increasingly determine the variety and quality of media content that audiences access and engage with. As regards to audio markets specifically, the competitive dynamics are driven by a handful of vertically integrated companies. These companies provide services (e.g., virtual assistants) that act as gateways for radio broadcasters to reach their audiences. As a result of their market position, these companies have the ability and incentive to extract unfair terms from radio broadcasters. They also provide radio-like services which (a) compete directly with those offered by radio broadcasters, and (b) benefit from unfair competitive advantages, such as prominent display, that limit the visibility of content offered by third parties.

Against this background, BMAI's response focuses on two matters that are discussed in the Policy: concentration of ownership and discoverability of audio services. The response sets out that:

- Ownership restrictions imposed on licensed radio broadcasters do not reflect the current market dynamics and must be considered against other parameters relevant to pluralism, such as media viability (**Part II**), and
- The implementation of the EMFA is an opportunity to safeguard the discoverability of audio services in markets where vertically integrated companies are in the position to dictate the media content that audiences access (**Part III**).

BMAI looks forward to engaging with An Coimisiún during the course of the implementation of the Policy.

II. Ownership restrictions imposed on radio broadcasters do not reflect the current market dynamics

A. The Policy must consider trade-offs between different objectives

An Coimisiún has adopted a three-prong strategy, which comprises its objectives (the objectives make up the purpose of the Policy, and they will inform the actions of An Coimisiún on an ongoing basis), outcome areas (the outcome areas emphasise where An Coimisiún particularly aims to achieve

³ Policy, p. 6.

impact), and indicators (the indicators, when combined with the outcome areas, provide a basis for measuring media pluralism and the impact of An Coimisiún's activity).⁴

This is a methodologically sound approach. The outcomes will be assessed against several different indicators that reflect how media markets work in practice. In turn, the outcomes will be telling of whether the relevant objective has been achieved.

However, the Policy does not set out how (and why) certain indicators may contradict each other and that trade-offs must be made to achieve an overall pluralistic outcome. For example, a key indicator is **concentration**. To make progress in the context of this indicator, An Coimisiún notes that there should be diversity of ownership, including in relation to governance and management structures, and media merger and acquisition activity.⁵ Another key indicator is media **viability**. According to An Coimisiún, to ensure media viability, different services and content should be able to *sustainably* coexist.⁶

In many markets, especially in small markets like Ireland, trade-offs between different indicators need to be made to achieve an outcome that protects pluralism. In practice, this means that certain rules, including those that establish ownership restrictions, will need to be revised to protect the viability of media outlets operating in the market concerned. This point is illustrated by the 2024 report that implements the Media Pluralism Monitor in the Irish market. The report notes that:

"[T]he only quantitative level on media ownership in Ireland lies within Coimisiun na Meán's 2024 Ownership and Control Policy which considers ownership of more than 25% of licenced commercial radio stations to be 'unacceptable'. (In consequence, at present BMAI's ownership of eight stations precludes it from making further acquisitions in the Irish market)".⁷

The report also notes that:

"[A]dvertising revenues remain at best flat (and in inflation-adjusted terms, declining) across legacy media markets [which] creates ever greater incentives for further consolidation of media outlet ownership".⁸

⁴ Policy, p. 7.

⁵ Policy, p. 17.

⁶ Id., 16.

⁷ Flynn, R. (2024). Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European member states and in candidate countries in 2023. Country report : Ireland, p. 21.

⁸ Id., p. 10.

This suggests that **concentration of media ownership is attributed to the (small) size of the advertising market**. To state the obvious, advertising is the main source of revenue for radio broadcasters.

In view of the above, BMAI invites An Coimisiún to reconsider the ownership threshold against the current conditions of the Irish advertising market.

B. Audio markets have been experiencing a major disruption

Another reason why An Coimisiún must reconsider the ownership threshold is that it implies that “traditional” radio broadcasters do *not* compete with other providers. This no longer reflects market realities, including the competitive dynamics affecting the distribution of audio services, for the reasons set out below.

Traditionally, radio broadcasters operated in a relatively stable environment with limited competition, mainly from other terrestrial radio stations. However, this dynamic has shifted dramatically. Radio broadcasters now find themselves in a competitive arena shared with a broad array of digital audio providers.

In countries where FM and DAB distribution modes are available, listeners often switch between these modes depending on reception quality, convenience, and device availability. That FM and DAB are substitutable methods of accessing audio content has been assessed by competition authorities across the EU, which found that DAB and FM belong to the same market.⁹ While other EU Member States have progressed with DAB, there is currently no operating DAB network in Ireland beyond the ongoing DAB+ technical trial. The absence of DAB in the Irish market has constrained BMAI (and other radio broadcasters) by limiting the number of licences and the range of services that can be offered to FM only. In the absence of DAB, streaming platforms become more important as gateways to audio content (see below).

The rise of streaming platforms and the explosive growth of podcasts and on-demand audio, has created a new listening culture in which consumers expect personalised, interactive, and mobile-first experiences. Social media platforms and video-first networks like YouTube and TikTok have also claimed substantial audio audience share, further fragmenting listeners’ attention. The expansion of the audio market has led to a notable decline in the market share of linear broadcast radio. It has also driven traditional players to invest in digital innovation, including simulcasting, web radio stations,

⁹ See, for instance, AGCM, C12017 - RETI TELEVISIVE ITALIANE/GRUPPO FINELCO, Provvedimento n. 25858, paragraph 12; C11987 - EI TOWERS/RAI WAY Provvedimento n. 25359, paragraph 29; ACM, Case KPN Telecom B.V/Nozema Services N.V. 5454/94 (2006), paragraph 46.

bespoke digital content, and integration with smart devices, so that they are able to respond to these competitive dynamics.

Yet, the competitive dynamics are now largely driven by a handful of large platforms that dictate what (and how) audio services are distributed. Virtual Assistants (VAs) are a case in point. Radio broadcasters rely on VAs - they must go where their audience listens, which is increasingly on devices with embedded VAs: smart speakers, connected in-car infotainment systems, handsets, and other devices. There is variation in the use of VAs across the EU (which largely reflects the availability of, and date of introduction of, VAs' local language variants), but in Ireland 6%¹⁰ of listening now comes from smart speakers. The use of VAs in Ireland is the highest within the EU¹¹ and such use can only be expected to increase.

VAs are vertically integrated at multiple levels of the value chain. In the case of radio, Google, Amazon and Apple's VAs offer audio content which competes directly with radio (e.g., Google offers YouTube Music and Google Play Music, Amazon offers Amazon Music, Apple offers Apple Music streaming service and radio-like stations (for example, Apple has launched Apple Music 1, Apple Music Hits and Apple Music Country). This means that platforms face conflicting incentives to support radio broadcasters in their distribution via the VA. There is evidence that some of the platforms may not engage constructively to support distribution or provide data to radio broadcasters to enable them to offer services.¹² Despite this, radio broadcasters must be present on the platforms as they represent an important gateway to reach end users. Moreover, VAs increasingly offer audio advertising in competition with radio. Finally, VAs have the ability to exert bargaining power over radio broadcasters as they control multiple parts of the value chain. For example, Amazon owns the device and platform (Echo), voice control software (Alexa), application store (Skills Shop), adtech, and payment mechanism (Amazon Pay).

Against this background, maintaining a strict and static ownership threshold on licensed commercial radio stations simply fails to reflect how audio markets have evolved in recent years.

In its Policy, An Coimisiún correctly identifies the following market conditions as some of the main risks to media pluralism:

¹⁰ Based on 2023 data for Ireland (Irish Audio Report 2023).

¹¹ Ibid.

¹² This practice is documented in the European Commission's 2022 IoT Sector Inquiry Final Report. See, for instance, paragraph 42 in p. 10, which notes that "in relation to data, [affected stakeholders] express concerns about the position of voice assistants at the centre of data collection in the consumer IoT. One particular concern is that voice assistant providers can control not only data flows and user relationships, but are also able to leverage these advantages into adjacent markets, that is the provision of other consumer IoT products and services. Moreover, third-party manufacturers and service providers consider that the limits on the data they receive from the leading voice assistant providers hinder them in their own business development". Retrieved from: https://competition-policy.ec.europa.eu/sectors/digital-media-electronic-communications/sector-inquiry-consumer-internet-things_en.

- The power of online intermediaries in influencing access to media content;
- The emergence, uptake, and use of certain digital technologies;
- Limited transparency and accountability in the operations of providers of online intermediaries and digital technologies;
- Increasing concentration of media service providers and advertising revenues, particularly in digital advertising (the digital advertising market is highly concentrated and the European Commission has recently adopted a decision to address Google's anti-competitive practices affecting it¹³).

The above market conditions should be reflected in the laws that seek to protect media pluralism. Notably, the 25% ownership threshold that currently applies to licensed commercial radio stations must be relaxed and An Coimisiún should instead focus on regulating the ownership rules applicable to online intermediaries more effectively. These platforms have been able to engage in M&A activity without being subject to the same (straitjacketed) rules as traditional media organisations. This would be in line with An Coimisiún's Policy document which acknowledges the power of "online intermediaries", which is directly linked to ownership concentration.

C. Traditional radio broadcasters must be given the opportunity to scale so that they can effectively compete with other providers

Based on the current competitive dynamics, radio broadcasters must be given the opportunity to scale so that they can effectively compete with other providers that are active in audio and digital advertising markets. The Irish legal framework poses constraints that prevent radio broadcasters from doing so.

Specifically, when seeking to acquire non-Irish assets, businesses that hold Irish media assets (such as Bauer Media Audio but including Irish-headquartered media businesses) are at a competitive disadvantage due to the fact that they carry "on a media business in the State". This disadvantage arises principally from the significant delay the competition and plurality filings for non-Irish transactions in the State cause in terms of the closing of the relevant transaction.

¹³ European Commission. Press release of 5 September 2025. Commission fines Google €2.95 billion over abusive practices in online advertising technology. Available at: https://ec.europa.eu/commission/presscorner/detail/it/ip_25_1992.

In a competitive bidding situation, this presents a significant disadvantage to sellers who are considering bids from other operators who do not hold Irish media interests and can proceed to close at pace. Perversely, where the acquisition gives rise to no competition or media plurality issues in the territory in which the target actually operates, the Irish clearance process will often be the only matter preventing completion when there is no prospect whatsoever of any impact on the Irish market.

In addition to the delay issue, the competitive disadvantage arises because of the additional costs associated with the filing and clearance process for such applications and understandable unwillingness of a vendor to accept further conditions to completion (that are typically not being sought by other potential purchasers).

Vendors in “non-Irish” acquisitions routinely communicate to BMAI that the lengthy Irish media merger notification process is problematic. Two examples from December 2023 illustrate this:

- Bauer Media Audio had substantially finalised an agreement to acquire a Polish radio business. However, this was a competitive auction, and the vendor was not prepared to allow Bauer Media Audio to work through the Irish media merger notification process and, accordingly, accepted a competing bid that was not so constrained. Importantly, the acquisition of this (Polish) business by Bauer Media Audio had no prospect of impacting media plurality in the State. Further, the only regulatory clearance that would have been required was in Ireland.
- Bauer Media Audio entered into preliminary discussions to acquire a local radio business in the UK. The vendor had made clear that the timeline associated with Irish media merger notification process was highly problematic. Again, this is a situation where the acquisition had no prospect of impacting media plurality in the State and the initial assessment suggested that the only required regulatory clearance (aside from the standard Ofcom licence transfer notification) would have been in Ireland.

It is clear that the existing regime prejudices Irish media businesses in competing to acquire assets outside the State while, in respect of such non-Irish assets, serving no useful function in preserving Irish media pluralism. The revision of the Media Pluralism Policy provides a useful opportunity for An Coimisiún to reflect on ways to resolve this issue.

III. Discoverability of audio content on VA platforms

In its Policy, An Coimisiún correctly identifies exposure diversity as one of the dimensions of media pluralism. The Policy notes that exposure diversity is defined by reference to whether a range of

media content is discoverable.¹⁴ Discoverability may be impeded by the practices of VA platforms on which radio broadcasters rely to reach their audiences. The implementation of Article 20 of the European Media Freedom Act (EMFA), which imposes on the providers of user interfaces discoverability-related obligations, is an opportunity to mitigate this risk.

In its Regulatory Impact Assessment of the Media Regulation Bill (an initiative that was undertaken to implement the EMFA), the Department of Culture, Education and Sport notes:

“Article 20 has a later date of application (8 May 2027) than other EMFA provisions. Due to its technical nature its implementation will require close dialogue with industry stakeholders which is currently ongoing at EU level. This means that it is not yet clear what would be the most appropriate monitoring arrangements. As such, it is intended that a legislative amendment to set out the monitoring arrangements for Article 20 will be brought forward at a later date in preparation for application in advance of the May 2027 deadline.”¹⁵

In BMAI’s view, the Department’s interpretation and proposed implementation of Article 20 should not be limited to addressing the configuration of the user interface. It should also address the conditions under which media content is made available on such interface. In practice, the implementation of Article 20 should also encompass measures that prevent providers of user interfaces, including VA platforms and connected car user interfaces, from charging access fees, and measures to secure the findability and discoverability of licensed radio stations via such user interfaces.

The EMFA acknowledges the role that platforms now play in determining the media content that audiences access and engage with. It also considers how platforms affect the ability of media service providers to (a) reach end users and (b) generate revenues that would enable them to invest in the production of diverse content. Notably, the EMFA states that:

“[G]lobal online platforms act as gateways to media content, with business models that tend to disintermediate access to media services [...]. Those platforms are also essential providers of online advertising, which has diverted financial resources from the media sector, affecting its financial sustainability and, consequently, the diversity of content on offer. [...] The challenges stemming from the digital transformation also reduce the ability of undertakings in all media sectors, in particular the smaller ones in the radio and press sectors, to compete on a level playing field with online platforms, which play a key role in the online distribution of content.”¹⁶

¹⁴ Policy, p. 8.

¹⁵ Department of Culture, Education and Sport (2025). Regulatory Impact Assessment of the Media Regulation Bill, p. 17. Available at: https://assets.gov.ie/static/documents/RIA_Media_Regulation_Bill_1.pdf p. 17.

¹⁶ EMFA, Recitals (4) and (6).

This is why the EMFA seeks to address several platform practices that artificially restrict the ability of media service providers to reach the public. Those practices include (unjustified) decisions to suspend the provision of services to a media service provider (by e.g., removing their content)¹⁷ and the preferential treatment of platforms' own (or business partners') services.¹⁸

Of particular relevance for our purposes is Article 20(2). Pursuant to this provision, the providers of user interfaces, including VA platforms, must ensure that end users are able to "freely and easily" change at any time their configuration, including the default settings that control or manage access to and use of the media services offered. Moreover, under Article 20(3), providers of user interfaces must ensure that the visual identity of media service providers is consistently and clearly visible to end users. Such obligations seek to achieve the objective of Article 20(1), which enshrines the end users' right to change user interfaces to customise the media offering in accordance with their interests or preferences.

The obligations imposed on platforms under Article 20 attempt to address the ability and incentive of platforms to restrict access to third-party media services. Related practices also affect the end users' ability to access and engage with the media content of their choice, to the detriment of media pluralism. As Recital (57) notes: "Recipients of media services providing programmes should be able to effectively choose the content they want to watch or listen to according to their preferences. Their freedom to choose content could, however, be constrained by commercial practices in the media sector; such as agreements for content prioritisation between media service providers and manufacturers of devices or providers of user interfaces controlling or managing access to and the use of media services providing programmes, such as connected televisions or car audio systems. [...]"

The same logic as that underpinning Article 20 and Recital (57) applies to the ability of VA platforms to unilaterally impose on radio broadcasters' revenue sharing requirements in exchange for access to the platform. Such commercial practices would prevent radio broadcasters from distributing their content on these platforms. They would also restrict the radio broadcasters' ability to invest in high-quality content and services. In turn, this would constrain the end users' ability to "effectively choose"¹⁹ the content they want to listen to.

Indeed, if Article 20 of the EMFA were implemented in a manner that only addresses the configuration of the user interface and not the conditions under which media content is made available on such interface, the objective it establishes would be rendered devoid of substance. This is because focusing

¹⁷ Id., Article 18(4).

¹⁸ Id., Article 20.

¹⁹ Id., Recital (57).

solely on the configuration of the user interface would ignore the next step in the consumption of media content, that is, the ability of the end user to access the content concerned. In other words, in the absence of an obligation to refrain from charging access fees, an obligation whereby end users are able to download, install and set as their default service an app provided by their preferred media service provider would have no practical significance.

Allowing VA providers to charge for access to the platform (whilst preventing them from configuring their user interface in a manner that serves their commercial interests) would simply enable them to exert their bargaining power over radio broadcasters at the next level of the supply chain. This would contravene the spirit of the EMFA. Against this background, in furtherance of the EMFA, which emphasises that platform practices have diverted financial resources from the media sector and the diversity of content on offer;²⁰ it is essential that Ireland (along with all other Member States) adopts measures that prevent VA platforms from charging access fees. Such measures may emanate from Article 20(4) of the EMFA, which establishes the Member States' obligation to adopt rules to ensure that the providers of user interfaces comply with their obligations under Article 20, and the Member States' competence to regulate the media sector (which derives from the Treaties and is not affected by the EMFA).

In the absence of clear and robust rules, providers of user interfaces may interfere with the free flow of information by engaging in practices that control, restrict or obstruct the ability of audiences to find media content. For example, providers of user interfaces may treat their own content services preferentially (or the content services of partners that pay for preferential treatment). This may occur with or without the knowledge of those audiences. All of this puts the viability of radio and, in turn, the free formation of opinion that is underpinned by (inter alia) editorially independent radio stations, at risk, endangering our democracies.

The UK Media Act 2024 provides a useful blueprint in this respect. The UK Media Act was enacted in May 2024.²¹ This instrument brought about significant changes to the regulations governing the UK media sector, including radio broadcasting, to ensure that the legal framework is informed by market and technological developments that have taken place in recent years. With respect to radio broadcasting specifically, the primary goals of the UK Media Act are to secure the long-term relevance of radio in light of the rapid growth in voice-activated usage and to preserve the significant public value radio provides.²²

²⁰ Id., Recitals (4) and (6).

²¹ The text of the UK Media Act is available here: <https://www.legislation.gov.uk/ukpga/2024/15>.

²² UK Media Act Explanatory Notes, paragraph 10, p. 5 and paragraph 8, p. 7. The Explanatory Notes are available here: <https://www.legislation.gov.uk/ukpga/2024/15/notes/division/1/index.htm>.

The preparatory works preceding the enactment of the UK Media Act concluded that there are imbalances in bargaining power between voice assistant platforms and radio broadcasters.²³ Subsequently, recommendations were made as to potential legislative intervention to “[protect] radio’s position in this environment into the future”.²⁴

Against this background, the UK Media Act introduced provisions to ensure that radio broadcasters may seamlessly access VA platforms to reach their audiences. Specifically, the UK Media Act imposes on VA platforms:

- An obligation to take all reasonable steps to secure that end users are able to select the radio service of their choice, and to cause that service to play;²⁵
- A prohibition whereby VA platforms are prevented from overlaying the radio broadcasters’ content;²⁶ and
- A prohibition whereby VA platforms are prevented from charging radio broadcasters “for doing what [they are] required to do” in order comply with (a) and (b) above.²⁷

Relatedly, the UK Media Act also establishes an anti-circumvention obligation, which prevents VA platforms from entering into an agreement that provides for the payment by a radio broadcaster that would breach, or is capable of breaching, the obligation to secure access to the platform concerned.²⁸

The obligations and prohibitions the UK Media Act imposes on VA platforms reflect (a) the key role that radio plays in a democratic society, (b) consumption patterns, including the fact that a growing proportion of radio listening is now online,²⁹ and (c) market realities, including the fact that VAs increasingly act as gateways for radio broadcasters to reach their audiences.³⁰ These three factors are also relevant to the Irish (and other EU) market(s), and it would be most useful if the approach taken by the UK legislator could inspire and inform regulatory initiatives in Ireland (and the other EU Member States), including the interpretation and implementation of the EMFA.

²³ Id., paragraph 9, p. 7.

²⁴ UK Media Act Explanatory Notes, paragraph 9, p. 7.

²⁵ UK Media Act, 362BI (1)(a).

²⁶ Id., 362BI (2).

²⁷ Id., 362BI (6)(a).

²⁸ Id., 362BI (6)(b).

²⁹ UK Media Act Explanatory Notes, paragraph 9, p. 7.

³⁰ Id., paragraphs 8 and 9, p. 7.



Aighneacht Chonradh na Gaeilge
do
Chomhairliúchán Choimisiún an Meán
maidir le
hlolrachas na Meán

Deireadh Fómhair 2025

INTREOIR

Cuireann Conradh na Gaeilge fáilte roimh an deis seo aighneacht a chur isteach Chomhairliúchán Choimisiún an Meán maidir le hlolrachas na Meán. Is deis í an comhairliúchán seo cothromas idir an Ghaeilge agus Béarla agus normalú a dhéanamh ar an Ghaeilge.

Is é Conradh na Gaeilge fóram daonlathach phobal na Gaeilge agus saothraíonn an eagraíocht ar son na teanga ar fud na hÉireann uile agus timpeall na cruinne. Is í príomhaidhm na heagraíochta an Ghaeilge a athréimniú mar ghnáth-theanga na hÉireann. Ó bunaíodh é ar 31 Iúil 1893 tá baill an Chonartha gníomhach ag cur chun cinn na Gaeilge i ngach gné de shaol na tíre, ó chúrsaí dlí agus oideachais go forbairt meán cumarsáide agus seirbhísí Gaeilge.

Tá Conradh na Gaeilge roghnaithe ag Foras na Gaeilge, an foras uile oileánda ag feidhmiú ar son an dá Rialtas thuaidh agus theas leis an nGaeilge a chur chun cinn, mar cheann de na sé cheanneagraíocht atá maoinithe acu leis an nGaeilge a fhorbairt ar oileán na hÉireann. Go príomha, tá Conradh na Gaeilge roghnaithe le tabhairt faoi chosaint teanga, ionadaíocht agus ardú feasachta ar an Ghaeilge. Tá breis is 200 craobh agus iomaí ball aonair ag Conradh na Gaeilge, agus bíonn baill uile an Chonartha ag saothrú go dian díograiseach chun úsáid na Gaeilge a chur chun cinn ina gceantair féin. Tá breis eolais faoi obair an Chonartha le fáil ag www.cnag.ie.

COMHTHÉACS

Níl a dhóthain le feiceáil nó le cloisteáil as Gaeilge ar na meáin trí chéile in Éirinn. Chomh maith leis sin, as an ábhar atá ar fáil as Gaeilge níl mórán rogha ann do phobal na Gaeilge agus na Gaeltachta agus dóibh siúd le spéis an teanga a chloisteáil agus/nó a úsáid níos mó:

- Ó thaobh na teilifíse de, tá rogha de bhreis is 300 stáisiún teilifíse ar fáil in Éirinn don té atá ag iarraidh féachaint ar ábhar teilifíse as Béarla. Chomh maith leo siúd tá ardáin eile ann ar nós Netflix, Prime, Amazon a chuireann méad mór ábhar ar fáil ar réimsí éagsúla spéise don phobal as Béarla. Don té atá ag iarraidh féachaint ar ábhair as Gaeilge, tá TG4 agus Cúla4 ann agus beagáinín de sholáthar as Gaeilge ar RTÉ. Tá an freastal ar ábhar spéise daoine le Gaeilge, mar sin, an-teoranta go deo.
- Ó thaobh an raidió de, tá 3 stáisiún as breis is 70 stáisiún sna 26 contae ag craoladh trí Ghaeilge agus astu sin tá ceann amháin dírithe go príomha ar phobal na Gaeltachta, ceann eile ag craoladh i mBaile Átha Cliath le ceadúnas pobail FM agus níl an tríú stáisiún, atá dírithe ar dhaoine óga, ag craoladh ar FM go leanúnach. Tá seónna Gaeilge ar chuid de na stáisiúin eile ach, don chuid is mó, bíonn na seónna ar siúl ag amanna neamhshóisialta, amanna nach mbeadh mórán den phobal ag éisteacht leo. Arís níl ach rogha an-teoranta don té le Gaeilge nó ag iarraidh an Ghaeilge a chloisteáil
- Ó thaobh nuachtán agus irisí de, níl ach 4 nuachtán Gaeilge ann (Tuairisc.ie, ExtraG.ie agus nós.ie atá ar fáil ar líne amháin agus An Páipéar a foilsíodh le déanaí) agus forlíne amháin agus cúpla alt seachtainiúil sa 70+ nuachtán eile sna 26 chontae. Chomh maith leis sin, níl ach 2 iris Ghaeilge as an 200+ iris ar fáil agus bíonn ailt ó am go chéile ag líon fíor-bheag de na hirisí eile. Níl rogha fairsing in aon chor ann don duine atá ag iarraidh a gcuid spéis ó thaobh nuachta nó ábhair iriseoireachta eile de a léamh as Gaeilge

Is é cuspóir an Stáit, mar atá leagtha amach sa Straitéis 20 Bliain don Ghaeilge 2010-30, an líon daoine ag úsáid na Gaeilge go laethúil a ardú 80,000 duine go 250,000 duine. Ní amháin sin ach ba mhaith leis an Stáit go mbeidh dhá mhilliúin duine le Gaeilge ann (ardú ó 1.78 milliúin). Creideann Conradh na Gaeilge go bhfuil ról nach beag an na meáin le spriocanna an Rialtais a bhaint amach agus le húsáid na Gaeilge i measc an phobail agus sa sochaí a normalú. Mar theanga dhomhanda, tá

sé rídheacair dul i gcomórtas leis an mBéarla ach tá sé níos deacra fós nuair nach bhfuil soláthar ceart sásúil sna meáin in Éirinn le freastal ar phobal na Gaeilge, na Gaeltachta agus dóibh siúd gur mian leo níos mó Gaeilge a fhoghlaim, a chloisteáil nó a úsáid.

ACHT NA dTEANGACHA OIFIGIÚLA

Má tá comhlacht poiblí i mbun cumarsáid tráchtála, is gá a chinntiú go bhfuil an comhlacht sin ag cloí le halt a 6 d'Acht na dTeangacha Oifigiúla (Leasú), 2021¹ a deir gur

i nGaeilge a bheidh 20 faoin gcéad ar a laghad d'aon fhógraíocht arna déanamh ag an gcomhlacht in aon bhliain' agus 'go ndéanfar 5 faoin gcéad ar a laghad d'aon airgead a chaithfidh an comhlacht ar fhógraíocht in aon bhliain a úsáid chun fógraíocht a chur amach i nGaeilge trí na meáin Ghaeilge'.

Déantar 'fógraíocht' a shainmhíniú san Acht (2021):

(a) cumarsáid tráchtála d'aon chineál a bhfuil d'aidhm léi, nó a bhfuil d'éifeacht léi, go díreach nó go neamhdhíreach, táirge nó seirbhís de chuid an chomhlachta poiblí lena mbaineann a chur chun cinn, agus

(b) cumarsáid d'aon chineál leis an bpobal, i leith na nithe seo a leanas—

- (i) foireann a earcú,*
- (ii) tionscnaimh reachtaíochta nó bheartais,*
- (iii) talamh nó sócmhainní a cheannach nó a dhíol,*
- (iv) seirbhísí a sholáthar, nó*
- (v) comhchomhairliúchán poiblí;*

ciallaíonn "meáin Ghaeilge" aon mheán ina bhfuil 50 faoin gcéad nó níos mó d'ábhar na meán sin trí mheán na Gaeilge."

IOLRACHAS NA MEÁN - SAINMHÍNIÚ & TÁBHACHT

Tá an iliomad gnéithe a bhfuil an-tábhacht leo i dtaca le hiolrachas na meán, ach tá sé tábhachtach go gcuirfear an éagsúlacht teanga san áireamh freisin. Tá easpa seirbhísí agus foinsí trí Ghaeilge ann, ach tá dul chun cinn déanta maidir le líon na bhfoinsí iriseoireachta agus nuachta Gaeilge le blianta beaga anuas, agus ba chóir líon agus caighdeán na bhfoinsí agus na bhfoilseacháin a chosaint, a neartú, agus a mhéadú sna blianta amach romhainn. Bunaithe air sin, molaimid go gcuirfear an gné a leanas leis:

Éagsúlacht Teanga

Líon agus caighdeán na bhfoinsí agus na bhfoilseacháin i nGaeilge agus i dTeanga Chomharthaíochta na hÉireann a chosaint, a neartú, agus a mhéadú sna blianta amach romhainn.

¹ <https://www.irishstatutebook.ie/eli/2021/act/49/enacted/ga/print#sec6>

Is iad seo a leanas cuspóirí an Choimisiúin maidir le tacú le hiolrachas na meán agus é a chur chun cinn:

1. *A chinntiú go bhfuil struchtúir úinéireachta agus rialaithe éagsúil agus trédhearcach.*
2. *Neamhspleáchas soláthraithe seirbhíse meán a chosaint i ndearadh, seachadadh agus scaipeadh ábhair, lena n-áirítear sa chinnteoireacht eagarthóireachta.*
3. *Tírdhreach meán atá faoi bhláth, cruthaitheach agus nuálach a rialáil, a fhorbairt agus tacú leis, ina gcinntítear inmharthanacht réimse seirbhísí agus ábhair meán.*
4. *Tírdhreach meán a rialáil, a fhorbairt agus tacú leis atá freagrúil do chearta, riachtanais agus leasanna sochaí éagsúla agus a léiríonn iad, lena n-áirítear maidir le **cultúr, teanga agus oidhreacht na hÉireann**.*
5. *A chinntiú go bhfuil sé de chumhacht ag daoine roghanna eolasacha a dhéanamh maidir leis na seirbhísí agus an ábhar a bhfaigheann siad rochtain orthu, a úsáideann siad agus a chruthaíonn siad.*
6. *A chinntiú go mbeidh ábhar meán iontaofa, údarásach agus ábhartha ar fáil, go mbeidh sé infhionnta, inbhuanaithe agus inrochtana, lena n-áirítear iriseoireacht neamhspleách iontaofa.*

Molaimid an t-aitheantas a thugtar do chultúr agus do theanga na hÉireann, agus molaimid go luaifead an Ghaeilge go sonrach:

*Tírdhreach meán a rialáil, a fhorbairt agus tacú leis atá freagrúil do chearta, riachtanais agus leasanna sochaí éagsúla agus a léiríonn iad, lena n-áirítear maidir le **cultúr, teanga agus oidhreacht na hÉireann, go sonrach an Ghaeilge agus Teanga Chomharthaíochta na hÉireann**.*

RIOSCAÍ & DÚSHLÁIN

Tugtar aitheantas don soláthar teoranta seirbhísí agus ábhair i nGaeilge sa dréacht-Bheartas, agus molaimid é sin. Caithfear aird a thabhairt ar gach gné agus cúis taobh thiar de seo, agus eiceachóras na meán Gaeilge a shamhlú ina iomláine. Níl an earnáil ardoideachais agus breisoideachais freagrúil don éileamh atá ann in earnáil na meán Gaeilge, agus líonann earnáil na meán Gaeilge bearnaí agus an t-éileamh laistigh dá n-earnáil féin. Faoi láthair, tá earnáil na Gaeilge ag feidhmiú gan foirne, agus le foirne le heaspa scileanna Gaeilge. Beidh comhoibriú tras-rannach ag teastáil le dul i ngleic leis an soláthar teoranta seirbhísí agus ábhair i nGaeilge atá aitheanta sa bheartas.

RÉIMSÍ TORAIDH & GNÍOMHAÍOCHTAÍ

Molaimid go gcuirfear na gníomhaíochtaí a leanas leis na Réimsí Toraidh thíos:

Rogha

rochtain thuaidh / theas a chinntiú d'ábhair i ngach teanga, go háirithe i nGaeilge

Cinntítear faoin réimse toraidh 'Rogha' go mbeadh rogha agus éagsúlacht ábhair ar fáil do phobail uile na hÉireann. Ag teacht le bun-choimintintí a rinneadh i gComhaontú Aoine an Chéasta, ba cheart go mbeadh teacht ag pobal na Gaeilge sna 6 chontae ar gach clár a chraoltar ar TG4 ó thuaidh fosta, go háirithe na cláir spóirt a chuirtear bac orthu, go minic agus foirne ó na 6 chontae ag imirt.

Seirbhís Phoiblí

Fáil ar ábhar i nGaeilge agus i dTeanga Comharthaíochta a chinntiú

TÁSCAIRÍ

Molaimid go gcuirfear na nithe a leanas leis an táscaire beartais thíos:

Feiceálacht

Líon na n-ábhar agus seirbhísí trí Ghaeilge méadaithe

Le hinmharthanacht a chinntiú, ba chóir go gcothaítear scileanna agus cáilíochtaí san earnáil meán Gaeilge, ionas go mbeidh eiceachóras feidmhiúil ann, agus fostaithe cáilithe, cumasacha le Gaeilge. Ba chóir go gcruthófar deiseanna uasoiliúna chomh maith, chun scileanna Gaeilge a sheachadadh d'oibrithe le scileanna faoi leith sna meáin. Molann muid go gcuirfear an ní a leanas leis an táscaire thíos:

Inmharthanacht

Méadú i líon na gcúrsaí agus modúil trí Ghaeilge atá ar fáil

CUR CHUN FEIDHME

Is gá infheistíocht shuntasach bhreise a dhéanamh sa Ghaeilge sna meáin trí chéile, cuma cén múnla a bhaintear úsáid as amach anseo, agus chun na gnéithe thuasluaite a chur chun feidhme.

Baineann na moltaí a leanas le maoiniú breise a chur ar fáil laistigh den chóras maoinithe reatha, agus le bealaí ar féidir leis an Rialtas maoiniú a chur ar fáil go lárnach amach anseo in aon mhúnla nua nó leasú ar aon mhúnla reatha. Sna moltaí céanna, tá cuid acu nach mbeadh aon chostas breise i gceist ach bheadh gá cur chuige a athrú leis an nGaeilge a chur san áireamh. Is iad na moltaí:

TG4 / Cúla4

1. Ba chóir go mbeidh buiséad de €100 milliúin ag TG4 le seirbhís iomlán leathan Gaeilge a sholáthar don phobal. Bheadh an maoiniú seo ag teacht leis an maoiniú a cuirtear ar fáil do S4C sa Bhreatain Bheag
2. Ba chóir go mbeadh TG4 ag cur níos mó cláracha ar fáil le fotheidil as Gaeilge nuair atá fotheidil Béarla san áireamh
3. Ba chóir go mbeadh soláthar i bhfad Éireann níos mó de chláracha do dhéagóirí
4. Ag teacht le bun-choimintintí a rinneadh i gComhaontú Aoine an Chéasta, ba cheart go mbeadh teacht ag pobal na Gaeilge sna 6 chontae ar gach clár a chraoltar ar TG4 ó thuaidh fosta, go háirithe na cláir spóirt a chuirtear bac orthu, go minic agus foirne ó na 6 chontae ag imirt.
5. Ba cheart go mbeadh ionadaíocht shásúil idir canúintí na Gaeilge ar chlár TG4 agus Cúla4, canúint Uladh san áireamh, le tuairisciú rialta ar chothromaíocht canúintí sna cláir chun an soláthar cothrom sin a chinntiú. Ar chlár do dhaoine óga agus páistí a chuirtear an Ghaeilge ar fáil via 'gúthú', ba cheart 'rogha cánúna' a chur ar fáil (féach *Super Simple Amhráin*) agus na roghanna sin a bheith ar fáil ar gach ardán a mbíonn seinnteoir TG4/Cúla4 ann.

Craolacháin Ghaeilge RTÉ

6. Ba chóir go mbeidh 15% den bhuiséad ag RTÉ curtha ar fáil do chraoltóireacht Gaeilge le cinntiú go mbeidh réimse leathan de chláracha ar fáil trí Ghaeilge ar níos mó ná stáisiún amháin (tá thart ar 7.5% de buiséad RTÉ ag dul ar chraoltóireacht na Gaeilge faoi láthair idir RTÉ Raidió na Gaeltachta agus cláracha teilifíse Gaeilge)
7. Ó thaobh rudaí go bhféadfadh RTÉ déanamh gan aon chostas le cur go mór mór le normálú na Gaeilge, ba chóir coinníoll a chur san áireamh i ngach Conradh do chláracha siamsaíochta, ar nós First Dates, Dancing with the stars, srl. go mbeidh ar na cuideachtaí léiriúcháin an Ghaeilge a chur san áireamh agus rannpháirtithe le Gaeilge a chur san áireamh sna cláracha teilifíse. Chabhródh seo go mór mór le normálú na Gaeilge
8. Ba chóir do RTÉ an Ghaeilge a chur san áireamh sna cláracha a sholathraíonn RTÉ iad féin, ar nós an Toyshow ar an Late Late Show
9. Creideann muid go láidir nár chóir go mbeadh aon íslí i líon nó caighdeán craolachán Gaeilge RTÉ toisc na bhfadhbanna atá ann le cúpla bliain anuas i struchtúr RTÉ. A mhalairt atáimid ag moladh agus gur chóir an deis a thapú le buiséad agus líon craolachán Gaeilge RTÉ a mhéadú agus múnlaí nua á phlé do RTÉ amach anseo.
10. Ba chóir go mbeadh cothrom na féinne curtha ar fáil d'fhostaithe Raidió na Gaeltachta ó RTÉ ó thaobh tuarastail de agus go mbeidh an tuarastal cuí curtha ar fáil mar chuid d'aon mhúnla nua
11. Tá tábhacht nach beag leis an réimse cláracha agus an láithreach a dhéanann Raidió na Gaeltachta fud fad na tíre agus ba chóir go mbeidh a dhóthain acmhainní amach anseo ann dóibh le cur leis an réimse seo

Seirbhís Raidió don Aos-Óg

12. Ba cheart go mbeidh maoiniú agus ceadúnas curtha ar fáil leis an stáisiún raidió Gaeilge don aos óg, Raidió Rí-Rá, a chraoladh le ceadúnas cuasaí-náisiúnta FM agus ar ardáin eile ar fud na tíre. Tá 63% den aoisghrúpa 15-34 ag éisteacht go laethúil leis an raidió ar FM agus ba chóir go mbeadh Raidió Rí-Rá mar rogha dóibh le héisteacht leis.

Meáin Ghaeilge eile

13. Ba cheart go mbeidh €1+ milliúin sa bhreis ag Foras na Gaeilge le dáileadh ar na meáin Ghaeilge reatha a mhaoineann siad, le Tuairisc.ie, nos.ie agus Raidió na Life san áireamh
14. Ba cheart go mbeadh iriseoirí lánaimseartha lonnaithe in achan Chúige ag na meáin Ghaeilge chun ionadaíocht chothrom agus clúdach náisiúnta a chinntiú, de réir an mhaoinithe atá á chur ar fáil ag an eagrais 'tras-teorann' Foras na Gaeilge. Sa bhreis air sin, is cinnte gur cheart go mbeadh comhfhreagraí lánaimseartha ag na nuachtán Gaeilge i mBaile Átha Cliath agus i mBéal Feirste chun na mór-scéalta polaitiúla agus cúrsaí reatha a chlúdach.

Coimisiún na Meán

15. Ba cheart go mbeidh coinníoll ann i ngach Conradh nua nó in aon athnuachan ar chonradh a chuireann Údarás Craolachán na hÉireann / Coimisiún na Meán ar fáil amach anseo le líon áirithe craolachán, agus ní níos lú ná 5%, a dhéanamh trí mheán na Gaeilge i rith amanna sóisialta
16. Is é Moladh 7-2 ón Choimisiún um Thodhchaí na Meán ná "Ba chóir don BAI/Coimisiún na Meán athbhreithniú cuimsitheach a dhéanamh ar sholáthar seirbhísí agus ábhair Ghaeilge ar fud chóras na meán ina leagfar béim ar struchtúir institiúideacha agus deiseanna maidir le nuálaíocht agus comhoibriú. Ba chóir go mbeadh moltaí san athbhreithniú seo, atá le tabhairt chun críche laistigh de 18 mí, maidir le soláthar seirbhísí Gaeilge a fheabhsú". Ba chóir tús a chur leis an athbhreithniú sin gan moill ach níor chóir go mbeadh an t-athbhreithniú seo úsáidte le moill nó stop a chur le forbairtí gur féidir bogadh ar aghaidh leo láithreach bonn ar nós buiséad TG4 a mhéadú nó Raidió Rí-Rá a chur ar FM nó eile

17. Ba chóir clár traenála a chinntiú le craoltóirí agus léiritheoirí Gaeilge a chur ar fáil don earnáil amach anseo

An Roinn Turasóireachta, Cultúir, Ealaíon, Gaeltachta, Spóirt & Meán

18. Mar atá molta cheana ag Conradh na Gaeilge in aighneachtaí chuig an Roinn Turasóireachta, Cultúir, Ealaíon, Gaeltachta, Spóirt agus Meán, ba chóir go mbeidh imeachtaí saorchraolta le tábhacht faoi leith don phobal, leis na Cluichí Oilimpeacha, an corn domhanda sacair, breis cluichí CLG agus mór imeachtaí spóirt eile san áireamh, craolta le tráchtairacht as Gaeilge chomh maith leis an mBéarla le freastail i gceart ar an bpobal. D'fhéadfaí seo a dhéanamh tríd iad a chraoladh ar TG4 nó / agus seirbhís shásúil tráchtairachta ar chainéal teilifíse nó raidió eile. Chuirfeadh seo go mór mór le normálú na Gaeilge sa phobal chomh maith.

An Roinn Ardoideachais, Breisoideachais, Nuálaíochta & Taighde

19. Go dtairgfear agus go bhfógrófar roghanna oideachais trí mheán na Gaeilge agus teastais cháilíochta sa Ghaeilge gníomhach i réimsí ardoideachais agus breisoideachais, lena n-áirítear na hEalaíona, na hEolaíochtaí agus na hEolaíochtaí Sláinte, agus 5% de chúrsaí tríú leibhéal a bheith as Gaeilge laistigh de 20 bliain
20. Go ndéanfar ollscolaíocht na Gaeilge agus cúrsaí taighde agus staidéir sa Ghaeltacht a chur chun cinn agus a láidriú.
21. Tacú le cur i bhfeidhm iomlán Acht na dTeangacha Oifigiúla (leasú), 2021, Acht na Gaeltachta, 2012, na Pleananna Gnímh a eascróidh as an bPlean Náisiúnta um Sheirbhísí Poiblí Gaeilge agus na Caighdeáin Teanga do chomhlachtaí poiblí a fhoilseofar ar ball
22. Tabhairt ar ollscoileanna foireann a aithint a bhfuil leibhéal B2 ar a laghad acu chun na gníomhartha thuasluaite a éascú agus dreasachtaí fostaíochta a sholáthar do bhaill foirne chun an leibhéal inniúlachta seo a bhaint amach.
23. Tabhairt ar eagraíochtaí poiblí modúl oiliúna acmhainní daonna gearr a chur i bhfeidhm do bhaill foirne ionas go mbeidh siad ar an eolas faoina ndualgais mar fhostaí de chuid comhlachta poiblí faoi Achtanna na dTeangacha Oifigiúla 2003 agus 2021. Is minic a bhíonn an Coimisinéir Teanga ag dul i ngleic le fostaithe comhlachtaí poiblí nach bhfuil ar an eolas faoina bhfreagrachtaí maidir le comhfhreagras scríofa agus comharthaíocht. Dhéanfadh modúl simplí oiliúna feasachta an fhadhb seo a réiteach in ollscoileanna agus daoine a chur faoi dhliteanas as sárú ar chearta na Gaeilge.

LÁIMHSEÁIL GEARÁN

Ba chóir go mbeidh an próiseas láimhseála gearán mar an gcéanna don phobal, cuma i mBéarla nó i nGaeilge a bheartaítear gearán a dhéanamh.

Ní mór a bheith airdeallach go dtuirmiscfear idirdhealú ar bhonn teanga go sonrach in Airteagal 21 de Chairt um Chearta Bunúsacha an Aontais Eorpaigh agus in Airteagal 14 den Choinbhinsiún Eorpach um Chearta an Duine.

CONCLÚID

Tá sé rithábhacht go mbeidh an Beartas seo i gcomhréir le reachtaíocht na hÉireann agus an Aontais Eorpaigh ó thaobh dualgais teanga agus cosaint chearta de, agus go gcuirfear i bhfeidhm an chosaint sin le linn an phróisis láimhseála gearán.

Ní mór na dualgais faoin reachtaíocht seo a leanas a bheith ag croílár obair Choimisiún na Meán:

- Airteagal 21 de Chairt um Chearta Bunúsacha an Aontais Eorpaigh
- Airteagal 14 den Choinbhinsiún Eorpach um Chearta an Duine.
- Acht na dTeangacha Oifigiúla (Leasú), 2021
- Comhaontú Aoine an Chéasta

Tá Conradh na Gaeilge ar fáil má tá aon cheist maidir le haon ghné den aighneacht seo.

https://www.cnam.ie/app/uploads/2025/08/20250827_Media-Pluralism-Policy-PConsult.pdf

We welcome the opportunity to comment on the Media Pluralism Policy. There is a shift in terminology as the document shifts from the previously much used term “Plurality” to the newer term “Pluralism”. Pluralism is the idea or philosophy of diversity in media whereas Plurality is the existence of and measurement of diversity in media. We would hope that this shift in terminology is not a move away from the practicality of plurality and not a move toward the idea or concept of pluralism without it needing to exist. Plurality is mentioned 3 times in the policy (2 of these mentions are naming the prior policy). Pluralism is mentioned 58 times. If the policy is more philosophical will there be assurances that it will influence the practice of the policy as it proceeds in the next phase?

To highlight a few of the areas of An Coimisiún’s role in media pluralism

Promotion of media literacy: Now more than ever we need action on Media Literacy to help keep a thriving democratic landscape for society and within the media. Community Media is the first place most people gain access to participate in broadcast media. All other media are difficult to access.. The active part of Pluralism is to access media that espouses an ethos that provides democratic access inline with the AMARC Charter. Media literacy that is action based is evidenced in joining Community Media in your local area. If none exists, then the ability to set up Community Media should be made more simple through funded support. Support for Aspirant Community Media stations should be financed through the support schemes of Coimisisún na Mean.

Funding sectoral innovation: This is a really important opportunity to support media for the many like Community Media. As media funding is now platform neutral, the anticipated convergence of media forms will take place. Community Media Hubs, as recognised in the FoMC report will play its part in the wider media landscape where Radio Print Online and TV will converge. The Digital Transformation Scheme is ideally placed to assist media who are beginning this journey.

Researching media ownership structures and changes, including the development of media ownership databases: Measurement of ownership is very important. This should also include annual promotion of the database as a source of quality media outlets. Alas Community Media which is 100% Irish owned and owned locally, producing 100% local content is not included in the media ownership database. Inclusion in the database would visibly enhance the look that Irish Media is not majority owned by large groups from outside of Ireland. Inclusion in the database would also give visibility to the Community Media sector as a regulated quality sector that viewers of the database can interact with.

Monitoring the allocation of public funds for advertising: The transposition of EMFA into Irish law and the measurement of the plurality when it comes to the placement of Public Service Announcements by An Coimisisún is welcomed. What we already know is that zero

Public Service Announcements are broadcast on Community Media. Firstly this means that these important announcements on health, wealth, social cohesion and dignity are not heard on the very channels that often most need to hear these messages. Often Public Services Announcements are channeled to other media sectors to help support the sector financially. This often leads to the over placement or misplacement of advertisements. One example: a Public Service Announcement for Free HRT scheme on a commercial "youth" radio network. Plurality of these messages should see them broadcast and printed in all media. We look forward to the first report on the allocation of public funds for advertising and a remedy for the underserved sectors of media.

Definition and origin of Media Plurality: 51 years before the The Charter of Fundamental Rights of the European Union, the Universal Declaration of Human Rights (Article 19) expressed the freedom to communicate and share information and ideas through any medium. Community Media's ethos through the Community Media Policy and AMARC Charter directly links Community Media's mission to uphold these freedoms within the media landscape. Community Media will continue to play its part in this regard, particularly where no Community Media exists currently. The creation of new services locally and nationally for Community Media can meet these needs. While the origins of the definition are well established in declarations there is a need to actively promote and defend the right to communicate. UNESCO 'Right to Communicate' is an example of this shift from rights to action on the ground. UN SDG 16.10 actively monitors freedom of access to information, and local monitoring of the same in Ireland would be good.

Media Ownership: Where there are issues with failing media businesses models and the protection of employment within the media sector, due concern to the ownership concentration must also be paramount. In the current media environment, the overall result is that while diversity of ownership of media platforms declines so does media plurality.

If business models are failing and large media groups can operate with scale of efficiency, is that ultimately good for employment practices and plurality? And if diversity of ownership narrows by buying up businesses that otherwise would not thrive, is allowing large media conglomerates ownership of scarce broadcast spectrum a good outcome for plurality? This itself is market distortion, where business models fail within markets, the option should be given to new entrants in franchise areas where concentration of media ownership is already at the limit.

Genuine plurality of media broadly safeguards freedom of expression and public interests, whereas, concentrations of media ownership, with limited access to the right to communicate, embeds and naturalises persistent social inequalities.

Innovation: While there is one mention of Artificial Intelligence in the section on Risks and challenges for media pluralism, the section on Innovation while not explicitly mentioning AI does seem to point in that direction. As Artificial Intelligence is so new and not something

that would be at home in a Declaration of Human Rights, we would welcome a precautionary approach to technologies like AI in the media. Such advancements in technology are not proven allies to Human Rights or Workers Rights which is something the Community Media sector has enshrined in the AMARC Charter.

Consultation Feedback: Media Pluralism Policy

Submitted by: EurAV European Audio Visual CLG (EurAV)

Platform: theM1 (hybrid media: web, video, audio, print-linked) – them1.eu



Introduction

EurAV welcomes this consultation on Ireland’s Media Pluralism Policy. We feel that media pluralism is about more than ownership or market share. It is also about trust, representation, and enabling people to access reliable information in ways that reflect how they live, learn, and engage.

It is our strong belief that community media has a vital role to play in strengthening pluralism. Until recently, funding for community media remained limited and fragmented, though the introduction of a dedicated Community Media Scheme in Budget 2026 marks a very welcome first step. EurAV is a not-for-profit, community-rooted organisation based in Drogheda. We are developing theM1.eu, a hybrid media platform shaped by how people increasingly want to consume information — reading, listening, or watching, depending on context and preference.

Our work is grounded in four constitutional pillars: social inclusion, media literacy, climate action, and arts and creativity. These values guide our approach to building a platform that is participatory, future-focused, and genuinely public-facing.

The role of community media in pluralism

Community and hyperlocal media outlets deliver pluralism in practice. Often, they are the most trusted sources in their local areas, precisely because they feature familiar voices — people known within the community — and are less susceptible to manipulation, deep fakes, or commercial agendas.

These platforms amplify voices that mainstream media often overlooks: migrants, ethnic minorities, young people, and those living outside of urban centres. If pluralism is to be meaningful, it must be lived and felt at the community level.

Supporting large national institutions alone will not be enough to protect pluralism. It requires parallel investment in grassroots infrastructure — outlets that build trust from the ground up. Community media, with its proximity to audiences and participatory ethos, is uniquely placed to help to combat mis-, dis- and malinformation.

Digital transformation and pluralism

In today's environment, media pluralism is inseparable from digital transformation. Without dedicated investment in tools, infrastructure, and training, community outlets will struggle to remain visible and relevant in the digital space where audiences increasingly spend their time.

EurAV is responding to this challenge through the development of theM1, a hybrid platform that allows communities to access trustworthy, public-interest content in whichever format they prefer. This approach reflects how people engage with media today and helps to ensure that community-based content remains accessible, inclusive, and engaging.

The demand for digital skills in the sector is clear. Our current community media training programme, funded by Coimisiún na Meán, received over 150 applications for just 20 places. Much of this engagement came through TikTok outreach, demonstrating both the appetite for learning and the importance of meeting younger audiences where they already are.

EurAV is an active member of Media Literacy Ireland and received a Media Literacy Ireland Award for our digital inclusion projects with older people. At a European level, we collaborate with partners through Erasmus+ and other initiatives to support digital development in the sector. Recently, our approach was recognised as a best-practice example by Italy's Erasmus+ National Agency — a sign that Ireland's community media sector has models of relevance well beyond our borders.

Alignment with policy outcome areas

EurAV's work directly supports the five outcome areas proposed in the draft policy:

- **Public service:** Our four pillars reflect public service values, aiming to inform, empower, and include.
- **Journalism:** theM1 is being developed to deliver trusted, independent, community-based information that strengthens public trust.
- **Choice:** Our hybrid model allows audiences to choose how they engage with content — across audio, video, print, and web.
- **Innovation:** We are innovating in both format and engagement — particularly through using platforms like TikTok as a 'breadcrumb trail' to engage difficult to reach younger demographics.
- **Inclusion:** Our multicultural projects and collaborative work foreground under-represented voices and experiences.

Measuring pluralism

We support the proposed indicators for measuring pluralism — particularly the inclusion of independence, transparency, accountability, representation, viability, prominence, and concentration. For community media, the most urgent of these is viability.

EurAV welcomes the announcement in Budget 2026 of the new €1 million Community Media Scheme under the Department of Culture, Communications and Sport. This represents an important recognition of the sector's contribution to media pluralism and trust. We encourage policymakers to ensure that the scheme is designed for accessibility, sustainability, and parity with existing supports such as Sound & Vision and the Digital Transformation Scheme. The initiative has the potential to provide the kind of structural underpinning that community media in Ireland has long needed.

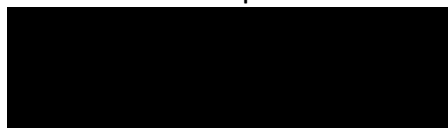
A meaningful policy on pluralism must go beyond scale or market share. It must recognise the unique value of small, independent outlets that, while modest in budget, enjoy high levels of trust and relevance in their communities.

Conclusion

Ireland's media pluralism will be stronger when community media is enabled to modernise, grow, and reach more diverse audiences. Our early-stage work on theM1 shows what is possible: a platform rooted in trust, shaped by community needs, and capable of engaging people across formats, languages, and generations.

With the right supports, we aim to develop theM1 as a national model — a replicable template that other communities can adopt and adapt. This would help to ensure that pluralism in Ireland is not only protected but made tangible, visible, and future-proof for generations to come.

Declan Cassidy
Executive Director,
EurAV European Audio Visual CLG



24 October 2025

Consultation on Draft Coimisiún na Meán Media Pluralism Policy

Independent Broadcasters of Ireland Response

We are pleased to provide our response to the above consultation and are grateful for all of the engagement on this matter and for the work of Coimisiún na Meán on this important area.

We have provided our view in this document as well as answering all of the consultation questions.

Introduction:

Coimisiún na Meán's Strategy Statement 2025 – 2027 sets out its mission to regulate, support, and develop a media landscape that fosters a democratic and pluralistic society. In fulfilling this objective and in line with the role and responsibilities, we believe that it would be important and worthwhile for An Coimisiún to broaden its understanding of its role beyond the narrow focus on broadcasters alone in 2009 Broadcasting Act. That Act was developed at a time when the media which were regulated by the predecessor organisations were solely or predominantly broadcasting.

The current situation in radio in Ireland: There is plurality within the independent broadcast sector, with at least 14 economic entities owning and operating radio stations. This is added to, in the general broadcast sector by RTE's stations.

The Centre for Media Pluralism and Media Freedom in its annual Media Pluralism Monitor research project assessed media plurality throughout Europe and has a specific project looking at this topic in Ireland. In its latest report it has concluded that Ireland remains at the lower end of the risks to media pluralism on the spectrum within the European Union.

Role of Coimisiún na Meán

Since its establishment Coimisiún na Meán has taken on responsibility for regulating a wider range of media sectors than was previously the case with its predecessor organisation. The added sectors include electronic media, such as the web and social media giants, and the major audiovisual platforms.

Hence, in our view, An Coimisiún needs to have a far wider view of the overall media landscape in Ireland. This needs to recognise that, for the purposes of successfully carrying out its role, a greater range of media and sectors have to be included in consideration of media plurality. Broadcasting will continue to be an important area but can no longer be the sole or prime area of concentration of attention by regulators and legislators. Definitions and areas to be reviewed and need to be far more inclusive of new media who have grown to have an outsized role in the media marketplace in Ireland, and which are recognised widely as presenting risks of harm to consumers, society and democracy, as well as to media plurality.

These other media who should be considered include:

- Very large Web platforms (search, consumer marketing and audio-visual)
- Very large Music streaming platforms
- Very large Social media organisations and platforms

Media market shares in Ireland

While numbers for all of the users of those web platforms are difficult to obtain, they stretch into millions of users and a legitimate proxy which can be used to indicate those platforms' market power is presented by the latest advertising market share figures.

The most up-to-date advertising market figures show that very large web and social media firms have the overwhelming majority share of the advertising market in Ireland. This is gained in part through the scale these companies operate at which inevitably brings market power. It is also added to, because the levels of regulation on the content or commercial operations of these players are not in any way comparable with the stringent regulation applied to established media players, such commercial broadcasters. This puts broadcasters at a very serious disadvantage and affects pluralism in the media.

The advertising market in Ireland is estimated to be worth €1.595 billion per annum (Source: Radiocentre Ireland). Following extremely tough years for the radio sector due to the 2008 economic crash, the Covid pandemic, and the rapid increase in inflation during this decade, it is clear radio's market and revenue share has not increased in parallel with the growth of the market which has seen the web and social media share rise to in excess of €920 million annually. This compares to independent radio's combined share estimated at less than €100 million per annum (based on IBI analysis of latest Radiocentre Ireland figures).

All of the above ensures that the media context in Ireland is far more complex than a focus on broadcasting alone would reflect.

It is clear from the above that, commercially and in terms of user numbers, the social media and video platforms have a very outsized position in terms of share of mind and share of

market, in excess of 60%, when streaming and video platforms are included. Ownership of those large web platforms is not regulated within Ireland under current legislation, and they are not subject to regulation as to editorial content or decisions, or commercial, or prevention of harm in any way comparable to broadcast radio. The editorial and commercial operations of those web and social media firms are directed from outside Ireland, unlike broadcasters in this country whose organisations and editorial teams are managed in Ireland, and are required to be under license. Algorithms used by the companies are opaque, meaning Irish media organisations can find it challenging to reliably reach audiences. Plurality can be negatively affected in our view by some web or social media market players having a “gate-keeper” role over content of other market participants.

Regulation of independent radio broadcasters and pluralism in the media

Yet, radio is strictly and disproportionately regulated in comparison with those very large platforms as to (inter alia): licencing, balance and content, protection of listeners from harm, commercial operations, ownership, and timing/content of advertising relating to children, regulations on election coverage, financial services, alcohol, gambling etc. Technology platforms are simply not regulated to the same degree. This places radio at a severe disadvantage in terms of competition, with the consequent risk to media pluralism.

In considering pluralism in the media, we believe it is vital that as well as ownership of media organisations, share of the overall media market (above) is considered. Pluralism also needs to be considered in relation to the licenced radio sector in terms of choice provided for listeners, and diversity of voices, and perspectives. Pluralism in radio needs to encourage freedom of independent editorial policies and ensure that they are not at risk of being unduly affected by national policy priorities.

Our detailed answers to the questions asked in the consultation are in **red below**

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?

In relation to the roles which Coimisiún na Meán sees itself as delivering, we note that it believes that from a regulation point of view these include licensing of broadcasters, registration of video-on-demand providers, codes and rules for broadcaster, video on demand providers and video sharing platforms, complaint handling and compliance, supervising online platforms obligations, reviewing the provision of public service media, assessing media mergers, researching media ownership and structures and monitoring the allocation of public funds for advertising.

A large part of this extensive list is focussed on broadcasters.

Therefore, it is a concern to our Members that there is an unlevel regulatory playing field on established media players, including radio broadcasters. We consider that there is a risk of

reduction in plurality in Irish broadcast media due to economic pressures, stemming from an outdated regulatory approach to the broadcasting sector.

The list of areas identified in the proposed Media Pluralism Policy for *Development and Support* is a shorter one and the list of areas identified as relating to *Audience* and users is shorter still. Those are areas could be addressed by the regulator after this consultation with additional media development actions designed to promote a thriving and sustainable independent broadcast sector, which is critical to media plurality because of its significant and loyal audiences and its trusted content.

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?

Media plurality needs to take account of the full range of Irish media consumption and of the potential for outsized power in a market by one single sector (web and social media) to the detriment of society and audiences, as opposed to intensive focus on a relatively small sector like broadcasting and independent broadcasting.

We point out that independent broadcasting is highly regulated, is highly responsible and has a record of facilitating a wide range of views. Decisions are made independently by each station's editorial personnel or operational personnel, and no single group viewpoint dominates. That gives citizens the opportunity to access and engage with a wide range of information and perspectives.

The dominant role of very large social and web platforms in the Irish media market is an area which needs to be prioritised in a media pluralism policy .

With that in mind, we welcome the definition's inclusion of 'diversity of exposure' to media, which the Commission defines as: "The extent to which a range of media content is discoverable and accessible". Media organisations' access to audiences is increasingly filtered through online intermediaries, such as search engines and online platforms. As trends in technology take-up and listening habits continue to evolve, radio broadcasters will become increasingly reliant on digital intermediaries, such as smart speakers, to reach our audiences. That potentially presents risks to media plurality, because while our content might be available to audiences on intermediary platforms, it may not be easily discoverable or accessible to audiences.

We have seen measures taken in the UK, under Part 6 of the Media Act 2024, to protect radio broadcasters' route to market on voice-assistant platforms, such as smart speakers. Designated platforms (known as "radio selection services") will have to ensure the UK-licensed radio stations are easily findable and accessible to UK audiences (e.g. the right radio station plays when requested), and platforms cannot insert their own advertising into radio streams, or charge for carriage.

We would strongly support an exploration of whether similar regulations could be introduced in Ireland, to protect Irish audiences' access to Irish radio stations in the decades to come. We believe that an important factor to consider in relation to pluralist media is that radio listeners must not be denied choice when driving or travelling in vehicles, or when using smart

devices or on platforms. The implementation of the European Media Freedom Act (EMFA) in EU Member States is a critical opportunity. Keeping radio accessible and prominent in cars is vital in Ireland because that is where so many listeners receive news and information or hear Irish music.

Radio also continues to play an essential role in society in Ireland and across Europe, providing trusted, high-quality, easily-accessible information, especially during weather emergencies when networks may fail.

The implementation of the Digital Markets Act (DMA), the Networks Act (DNA) and the European Electronic Communications Code (EECC) are vital and upcoming revision of the EECC and DNA offer unique opportunities to secure the future of radio in vehicles and on dashboards without commercial barriers or other barriers to visibility, accessibility or prominence.

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

We agree that media pluralism is important, but we believe that the Policy being developed should be focussed on outcomes including ensuring a continued economically sustainable Irish licenced broadcasting sector.

Diversity is key not just within broadcasting, but in the greater market. It should take into account diversity among the remaining media beyond broadcasting, including in particular the share of the market by very large web and social and music/video platforms, as well as podcasting and other forms of electronic publishing.

Crucial to media plurality is a level playing field in regulatory, economic, and legal areas. Therefore, restrictions on ownership, or financial, political or other advertising on Irish managed media should not be more onerous than those on the large platforms where content codes, commercial codes, and ownership restrictions do not apply. A good example of this is where Irish based broadcasters are required to have content dealing with environmental sustainability, inclusivity and Irish language. Those restrictions do not apply to large platforms.

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?

The risks and challenges to media pluralism in Ireland have been demonstrated since the 1990s in the closure of a number of media outlets (Irish Press, Sunday Press, Evening Press, Sunday Tribune, Ireland on Sunday, multiple local newspapers and Century Radio and others) and by the pressures on commercial revenue in other sectors such as broadcasting.

The risk of the current unlevel playing field in regulation include its effect on the mission of An Coimisiún of supporting a thriving sector.

Limited revenues in the remaining parts of the Irish media resulting from unfair competition would inevitably result in the lack of investment and limitation of financial resources in the highly and uniquely regulated radio sector. This has the potential to negatively affect retention

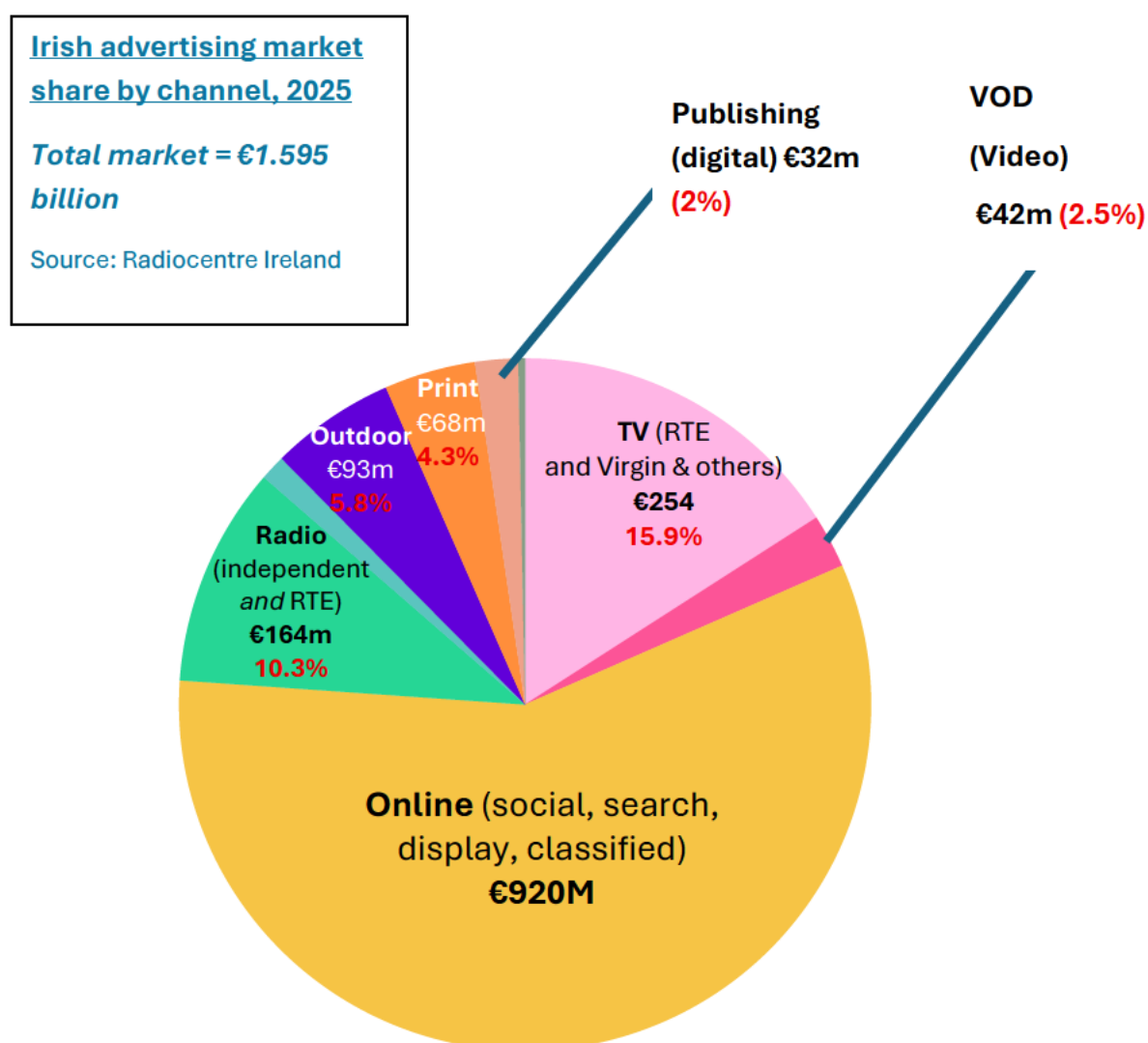
and attraction of a range of staff involved in content and other areas, as well as the maintenance and development of existing content and services which are valued by citizens.

We believe that An Coimisiún should take account of the factors we have set out below in terms of the market share of other players outside of broadcast and of the unique regulatory requirements applying to radio broadcasters. These factors should be considered in taking a decision on a level playing field in regulatory terms.

We have previously stated that where media organisations or sectors are eroded or disappear the international experience is that they do not return.

Information of market share in the media in Ireland and on the unique regulatory obligations of our sector is below.

IRELAND'S MEDIA MARKET – KEY STATISTICS AND FACTS



Unique regulatory and content obligations of licensed broadcasters compared to web/social media

Regulatory Standards and Mandatory Codes	Broadcasters	Web and Social media
Code on protection of consumers from harm and undue offence	✓	✗
News and Current Affairs – Code of Fairness, and obligation to ensure accuracy and balance	✓	✗
Professional and ethical standards to prevent misinformation and disinformation	✓	✗
Ownership regulation (CCPC and Dept of Communications, Culture and Sport). Approval required for any change in shareholding.	✓	✗
Require licence to operate as a media business, satisfying authorities on multiple criteria	✓	✗
Required by regulator to have a prompt and effective complaints process – proven in practice	✓	✗
Keeps consumers' data safe/does not take it automatically	✓	?
Controls on advertising of alcohol	✓	✗
Elections - fair coverage Code and moratorium	✓	✗
Code on content and advertising relating to children	✓	✗
Controls on advertising of infant food products	✓	✗
Stringent controls on timing gambling advertising	✓	✗
Controls on proportion of advertising allowed compared to other content	✓	✗
Ban on political advertising	✓	✗ While platforms are subject to disclosure rules, they are allowed to carry political advertising.
Require regulatory approval for any changes to content commitments	✓	✗

License to broadcast/operate can be rescinded by regulator	✓	✗
Effective processes to prevent scam advertising including crypto and fake use of prominent people's images or names	✓	✗
Medicines or cosmetic treatment advertising - rules on advertising	✓	✗
Prevention of harmful information about health or trauma	✓	✗
Restriction on advertising for slimming products and High Fat or Salt Products	✓	✗
Smoking Cessation product advertising rules	✓	✗
Restrictions and terms and conditions for financial services advertising	✓	✗
Require approval for Senior Management Appointments	✓	✗
Restrictions on ads for fortune tellers or psychics	✓	✗
Program policies on equality and inclusion	✓	✗
Programme Policies on environmental programming	✓	✗

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

The objectives are as follows and we have commented on each in **red**.

- *"To ensure ownership and control structures are diverse and transparent."*

IBI comment: This role needs to be carried out while simultaneously taking into account the effect of regulation on smaller entities such as commercial radio, and by the same levels of focus taking place in relation to very large platforms.

- *"To safeguard the independence of media service providers in the design, delivery, and dissemination of content, including in editorial decision-making."*

IBI comment: This needs to be done by constructive, positive media development regulation, which does not get caught up in administrative issues, but promotes a sustainable and thriving media sector. It also needs a level playing field in legislation and regulation.

- *“To regulate, develop, and support a thriving, creative, and innovative media landscape where the viability of a range of media services and content is ensured.”*

IBI comment: Independent funding needs to be provided by Government to An Coimisiún which is within the regulatory body’s control, and governed only by compliance with its legislative obligations. Funding should not have “strings attached” in terms of restrictive thematic areas of focus which are only directed at broadcasters. An Coimisiún needs to become an **advocate** on behalf of the media as well as a regulator of the media.

- *“To regulate, develop, and support a media landscape that is responsive to and reflective of the rights, needs, and interests of a diverse society, including with regard to Irish culture, language, and heritage.”*

IBI comment: By promotion of training and development, and by setting high level objectives An Coimisiún can put in place the conditions for the above areas, but it should not be involved in setting specific mandatory conditions or themes/topics which infringe freedom of editorial control and expression. Were an authoritarian government to be elected in the future, the definition of pluralism needs be one where journalists’ and content providers’ editorial freedom is not at risk.

- *“To ensure that people are empowered to make informed choices as to the services and content they access, use, and create.”*

IBI comment: In order to empower users, those consumers need to have choice that is not restricted by the outsized market role of the very large digital platforms in their media consumption journeys. We strongly welcome measures to improve the transparency of algorithmic operations, which may become even more important in the age of Gen AI.

Therefore, it can be said that someone has the freedom to switch on the radio or to switch it off, without control by the media of consumer actions, and with choice of which station to listen not. That is not the case with social media or web platforms where consumers struggle to digitally disconnect.

In many cases platforms have dominant positions in different sectors and provide services which it is difficult to citizens to operate without, reducing choice. Not having an account with some very large providers can affect a consumer's ability to access services.

- *“To ensure that trusted, authoritative, and relevant media content is available, discoverable, sustainable, and accessible, including independent and trusted journalism.”*

IBI comment: While media literacy has a role in empowering people to make informed choices, the range of media available is also a factor. It is important not to exaggerate the effect of media literacy in isolation, which is often a weakness of strategies relating to reducing disinformation. In parts of the UK and US, there are news deserts where due to economic factors local media have faded. So advising people of their Media options and of the need to consult a range of media to ascertain accurate facts, only works if trusted media like broadcasters and publishers are available. Fair competition and proportionate and **accessible** support for regulated and licenced broadcasters is vital.

That is where the role of An Coimisiún of advocating on behalf of sectors like radio is needed, and where actions to address unlevel playing fields are needed.

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?

We have commented on each of the proposed outcomes in **red below**:

Public service

Media services and content that reflect and serve the public.

Public service media and public service content – media that is owned and funded by the public – play an essential role in society. They can uphold the rights of citizens and fulfil a range of needs and interests. **This must not be restricted to media owned and funded by the public - independent commercial broadcasting's specific role needs to be called out as valued and as qualifying as a public good, and therefore supported. Careful consideration needs to be put into practical solutions which recognise the unique role of independent radio.**

Journalism

Quality, independent news and current affairs services and content.

Access to trusted, independent, and impartial news and current affairs is vital to ensure informed debate about matters of public interest.

A number of challenges arise in relation to the provision of news and current affairs content, including disinformation and misinformation, and the viability of media service providers, particularly at regional and local levels.

The role of the very large social and web platforms needs to be added to the challenges facing the media ecosystem and plurality, as the challenges are not only at local levels.

Media Pluralism Policy

In the implementation of the Policy, An Coimisiún will engage in activities to enable news and current affairs content to:

- maintain editorial independence;*
- follow regulatory standards;*
- benefit from appropriate funding to support provision and careers;*
- enjoy and build on the trust of a range of people; and*
- objectively, impartially, and fairly represent a range of voices, opinions, and analyses.*

IBI agrees with the above policy objectives but this implementation needs to ensure that independent broadcasters are not disadvantaged owing to their uniquely regulated status and role and that a level-playing field is at all times kept as a priority.

Choice

Informed discovery of and access to a range of media services and content.

Users and audiences should be exposed to a range and mixture of media services and content, ensuring their access to voices, opinions, and analyses.

Availability of content does not equate to access to content. The availability of a range of services and content does not mean that users and audiences are accessing and using them, nor that they are fully informed about those services and content.

In the implementation of the Policy, An Coimisiún will engage in activities to enable users and audiences to:

- *understand who creates and owns services and content;*
- *understand the impact of ownership on media;*
- *understand how and why services and content reach them;*
- *discover and access different services and content;*
- *critically think about the services and content they discover and access.*

IBI agrees with the above outcomes.

As in our answer to Q2, we would strongly welcome work to explore introducing a regime similar to that introduced under the UK's Media Act, to ensure that Irish-licensed radio stations are easily accessible and findable on voice-assistant platforms, including smart speakers and in-car operating systems. This would ensure that Irish audiences can continue to easily access Irish radio stations on a range of platforms, and support access to a plural media market.

Our independent radio sector already provides choice and that needs to be recognised.

Innovation

New possibilities for media services and content.

New and emerging technologies, while posing challenges to the media landscape, present new opportunities for the design, delivery, and dissemination of media services and content.

Innovation is both dependent on and a precondition of media service and content viability – media services and content require adequate support to innovate, and they are required to innovate to develop and reach

new audiences in new ways. A level playing field for media services and content can foster innovation.

In the implementation of the Policy, An Coimisiún will engage in activities to enable media services and content to:

- use and invest in a range of technologies to design and deliver content;
- explore non-traditional services and formats and new dissemination channels;
- be supported by skills and capabilities in the media and digital sectors;
- benefit from appropriate funding for innovation; and
- build on existing partnerships and create new partnerships.

IBI agrees with the above proposed outcomes

Inclusion

Upholding everybody's right to participation and expression in the media landscape.

IBI agrees with the above proposed outcomes, subject to this applying to all media.

Media Pluralism Policy

A diversity of voices, opinions, and analyses can only be supported by the participation of a diversity of people in the media landscape.

Media services and content should reflect, be shaped by, and be accessible to the diversity of society. In particular, media have a role in promoting understanding, inclusion, and respect for diversity. The role of public service, national, regional, local, and community media is significant in providing opportunities for such inclusion, though it should be embedded throughout the media landscape. This also needs to include very large platforms including web, social media, video and music streaming apps.

In the implementation of the Policy, An Coimisiún will engage in activities to enable media services and content to:

- *be owned, governed, and managed by a diversity of entities;*
- *fairly and respectfully reflect a diversity of people in content and content production;*
- *be created and informed by a diversity of people;*
- *be accessible to a diversity of people; and*
- *benefit from appropriate funding to support such diversity.*

IBI agrees with the above proposed outcomes but subject to this applying to **all** media including very large platforms.

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?

Independence

There should be minimal interference or influence in editorial decision-making from political, commercial, or other sources. **We agree with this.**

We believe that the indicators adopted should fit in with our preferred outcome comments above and that media plurality should include an economically sustainable independent radio broadcasting sector in order to maintain that plurality.

Independent Broadcasters of Ireland, October 2025

News UK and Ireland's response to Coimisiún na Meán's consultation on its Draft Media Pluralism Policy

Introduction

News Corp UK and Ireland Ltd (**'News'**) is one of the leading media businesses in the UK and Ireland. News operates a multi-platform news publishing and broadcasting business in Ireland, under our News Ireland and Onic divisions. Under News Ireland, we publish both *The Irish Sun* and the Irish edition of *The Sunday Times*, which reach 1.3 million adults every week.¹ Onic operates a network of local radio stations, serving audiences in Dublin (FM104 and Q102), Cork (96FM and C103), Limerick (Live95), and Louth and Meath (LMFM), and reaching 793,000 listeners every week.² Spanning print and pixel, audio and video, our multi-format brands are home to a plurality of news, opinion, analysis and entertainment. We are a member of NewsBrands Ireland, the Independent Broadcasters of Ireland and IAB Ireland.

News welcomes the opportunity to respond to Coimisiún na Meán's consultation on its draft media pluralism policy. A plural media market is essential to any healthy democracy. It is vital that audiences have access to a wide range of perspectives and voices, enabling them to think critically, develop their own opinions and make informed decisions about the issues that matter to them.

News supports An Coimisiún's role in securing and promoting media plurality and strongly welcomes the modernisation in its approach to media pluralism. However, there are areas where we suggest that An Coimisiún clarifies its proposed position, including:

- on the challenges Gen AI poses to media plurality; and
- on the relative importance of structural and market challenges to media pluralism.

Below, we set out our views on these two areas before answering specific consultation questions in turn.

The draft position rightly reflects the important role of technology platforms in media supply chains, but risks overlooking the challenges posed by Gen AI

News supports the broadening of the definition of 'media pluralism' to reflect the importance of access, exposure and prominence in how audiences engage with media services and content. We strongly agree with An Coimisiún that factors influencing a plural market now go beyond issues of ownership and control over media organisations. As An Coimisiún rightly notes, the availability of a range of media sources does not necessarily reflect the accessibility of a range of sources to audiences.

¹ The total combined (print & digital) weekly reach across *The Irish Sun*, thesun.ie, *The Sunday Times* and thetimes.com for all adults in the Republic of Ireland. Source: TGI Republic of Ireland R2 2025, September 2025, read in the past seven days.

² JNLR/Ipsos 2025-2, August 2025.

Technology platforms play a critical role in media supply chains, as they have done for nearly two decades. Media organisations have become increasingly dependent on platforms to reach their audiences, with platforms conditioning how audiences access and engage with media content online. As Gen AI adoption increases and the technology continues to evolve, it is likely to bring further disruption to the media market and therefore media plurality.

As Robert Thomson, Chief Executive of News Corp recently said: *“...I remember being asked to address the House of Lords in 2007. A committee was examining the impact of digital on media, which was, and it was clear then, that there was going to be a profound impact, and probably not a positive one. And one of the reasons was what you might call egregious aggregation, where there had been a huge shift in power from creators, journalists, writers, musicians, to distributors, Google, Facebook and others. And so, with that shift came a shift in revenues and really the undermining of the act of creation, the ability of media companies to hire great journalists, and the ability of book publishers to commission authors at reasonable revenue levels for them, i.e. that great authors should get great payments. And so that really has continued through the decades and been accelerated by the rise of AI, because AI is really the exponential expansion of the digital world in many respects, including in the violation of IP.”*³

While artificial intelligence is mentioned in passing in the draft Policy, its impact on the media sector and therefore media plurality risks being overlooked. It presents a challenge to the financial sustainability of media organisations, and financial sustainability is what ultimately underpins a thriving, plural media market. But Gen AI also matters to media plurality because of the potential impact on the quality of information available to audiences. There are three issues that should be considered in the context of the draft Policy:

- **Copyright infringement and licensing:** News articles are scraped by AI models to provide the most up-to-date and accurate information in Gen AI outputs. Where there is no licensing agreement in place between a media company and a Gen AI firm, news organisations are not being remunerated for the use of their journalism.

As part of a large, international media company, News UK and Ireland is fortunate to have partnerships with global technology companies, including a global AI licensing agreement with Open AI. But we recognise that smaller media organisations may be in a different position. Licensing agreements are important because they lift all boats; they ensure AI firms can access the data they need for their models, while ensuring media organisations get a return on the use of their journalism.

- **Substitutability and greater intermediation:** There is a risk that Gen AI services and content may increasingly act as substitutes for media services and content, with consequences for the core revenue streams of most media organisations (e.g. advertising, subscriptions). It also risks further loosening the relationship between audiences and media organisations, particularly if Gen AI services do not properly or prominently attribute material to the correct sources.

³ Robert Thomson, News Corp CEO, The Times Tech Summit, October 2025

- **Reliability of information and range of sources:** Gen AI ‘hallucinates’ information, meaning that users may be provided with incorrect or made-up information. It may incorrectly attribute a hallucination to a source, which presents reputational issues for established media companies.⁴ Additionally, in providing a single answer to a query, it risks narrowing the range of sources an individual engages with.

We encourage An Coimisiún to give greater consideration to the challenges Gen AI poses to media pluralism. Otherwise the policy risks becoming rapidly outdated.

We encourage An Coimisiún to prioritise tackling the structural and market challenges to media pluralism

While we welcome the draft Policy’s broader and modernised definition of media pluralism, it is difficult to see how it will have a tangible impact on An Coimisiún’s work given the proposed approach to implementation set out. We strongly encourage An Coimisiún to prioritise tackling the two structural and market issues that have the biggest impact on media plurality: 1) issues of access and exposure to audiences, and 2) financial sustainability.

There are steps An Coimisiún, working with the government where relevant, can take to ensure that audiences can easily find and access a plural range of news and media sources as consumer habits and technology continue to evolve. For example, in the radio market, An Coimisiún and the government should consider the merits of introducing findability and accessibility requirements for Irish-licensed radio stations on voice-assisted platforms, such as smart speakers, to ensure that audiences can continue to access local, regional and national stations, however they choose to listen.⁵

An Coimisiún could also consider means to support the commercial sustainability of the Irish media sector beyond State funding schemes. There are levers in An Coimisiún’s gift to support the sustainability of commercial media organisations, including loosening existing commercial restrictions in an already heavily regulated, established market. Furthermore, we note that independent commercial media companies are operating in a market whereby the national broadcaster has a triple-sourced funding model, receiving both Licence Fee and direct Exchequer income, while competing with independent commercial operators for advertising revenues.

Similarly, both the government and national bodies - including An Coimisiún - could consider supporting the commercial sustainability of indigenous Irish media organisations, and therefore media plurality, by committing to dedicate a certain proportion of their annual advertising spend to national, regional and local Irish news publishers and broadcasters.

⁴ We note research carried out jointly by the BBC and EBU on the integrity of AI assistants for news, and research carried out by the BBC on levels of trust audiences place in AI assistants for news. See EBU-BBC, October 2025, [News Integrity in AI Assistants: An international PSM study](#). BBC, October 2025, [Audience Use and Perceptions of AI Assistants for News: Research findings](#).

⁵ This would mirror the soon-to-be introduced regime in the UK. The Media Act 2024 provides Ofcom with the powers to designate voice-activated platforms, as ‘radio selection services’ (RSS). RSS must ensure that UK-licensed radio stations are easily findable and accessible to UK audiences, and they cannot insert advertising into radio streams, or charge for carriage. As of August 2025, 7% of listening time to radio was via a smart speaker. When this was first measured in 2020, the figure was c. 1%. JNLR/Ipsos 2025-2, August 2025.

Dedicating advertising spend in a conscious way supports the commercial viability of media organisations in a two-way exchange. There are already interventions to place around the advertising spend of State bodies, specifically to ensure that a certain proportion of public bodies' advertising spend is on Irish-language advertising content in Irish-language media, so it would not be without precedent.⁶

Please find our answers to specific consultation questions below. To avoid duplication, we have grouped our answers to questions where relevant.

Answers to specific consultation questions

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?

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

We support Coimisiún na Meán's role in promoting and safeguarding media pluralism, and we broadly support its vision and objectives. However, we would encourage An Coimisiún to consider clarifying the scope of its role, vision and objectives. An Coimisiún's role should be clearly focused on enabling pluralism through measures that tackle structural and market issues, not by extending regulatory control over editorial or journalistic activity.

In particular, we are concerned about the risk of potential over-intervention by An Coimisiún in editorial processes in both news publishing and broadcasting environments. News publishers adhere to a well-established self-regulatory system through the Press Council of Ireland and the Office of the Press Ombudsman. Safeguarding media pluralism should mean that editorial processes operate independently and free from influence, including burdensome reporting, compliance or governance obligations.

Similarly, while broadcasters are regulated by An Coimisiún, broadcasters themselves are best placed to determine who they hire, the type of editorial content they make and how to respond to changing audience needs, tastes or interests. They should be free to make those decisions without influence.

On the draft Policy objectives, we particularly welcome the inclusion of issues of discoverability and accessibility within objective 6, given the role platforms now play in the media supply chain. However, we have queries about both objectives 4 and 5.

- On objective 4 (to ensure a responsive and diverse media market), we consider that if objectives 1-3 are secured, objective 4 will likely be achieved as a consequence. It

⁶ Section 10A (Advertising by Public Bodies) of the Official Languages Act 2003, as amended, requires that public bodies ensure that: 1) at least 20% of any advertising they carry out in any year shall be in Irish, and; 2) at least 5% of any money they spend on advertising in any year shall be used for advertising in Irish in Irish-language media.

is in the interests of commercial media businesses to respond to the needs and interests of audiences, and to identify and move into gaps in the market.

- On objective 5, we question the inclusion of ‘create’ (*‘To ensure that people are empowered to make informed choices as to the services and content they access, use, **and create**’*). More broadly, clarity would be welcome on the emphasis on individual content creation throughout the draft Policy document.⁷ It risks suggesting that An Coimisiún considers individual ‘creators’ (e.g. anyone who posts on Instagram, TikTok, YouTube etc.) to be in scope of this draft Policy. It blurs the boundaries between professional media organisations - such as those regulated by An Coimisiún - and any member of the public.

Alternatively, it is unclear whether the use of the word ‘creator’ through the draft Policy reflects language used by Ofcom in its 2021 Statement on the Future of Media Plurality, in which it recommended that the UK government consider introducing a new term of ‘news creator’ to its Media Public Interest Tests to account for online-only providers in the news media supply chain.⁸ We would therefore welcome An Coimisiún clarifying how it is defining the term ‘creator’, and how content creation by individuals relates to the scope of this draft Policy.

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?

As set out, News supports the modernisation of the definition of media pluralism, particularly the focus on the ‘diversity of exposure’. Intermediation between media providers and audiences has been the key change in the media sector in the last 15 years, meaning media services have much less control over how their content reaches audiences. This structural issue presents a significant challenge to media pluralism, and is only likely to become more difficult in the age of Gen AI.

But there is a gap in the definition; there is no reference to the importance of financial sustainability. We suggest that the definition of ‘diversity of services’ is amended to read: *‘The coexistence of a number of distinct, **sustainable** media services or platforms for the design, delivery, and dissemination of media content.’*

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

We agree on the importance of media pluralism. But in its description of the importance of media pluralism (below), An Coimisiún seems to downplay the positive and necessary role the media sector plays in public life, and therefore why media pluralism matters.

‘Media have a role in producing and providing reliable information and diverse perspectives, and can promote participative democratic processes, intercultural understanding, social

⁷ See pages 8, 10 and 12.

⁸ Ofcom, 2021, [Statement: the future of media plurality in the UK](#), see pages 26-30.

inclusion, and respect for diversity. Media can have a significant role in forming public opinion and shaping public discourse.'

It is strange for An Coimisiún, as the media regulator and advocate for the sector, not to be more emphatic about the positive role of the media sector. For example, the news media plays an integral role as the fourth estate - freely and independently holding the powerful to account, investigating wrongdoing and reporting on issues of public interest, and informing audiences across the country about the issues that matter to them. Similarly, the broadcasting sector plays an important role beyond its news provision, prompting debate and discussion, showcasing a diversity of perspectives, and offering companionship and entertainment.

Media plurality is only important if the media itself is important. We would therefore welcome An Coimisiún strengthening the drafting in this section to reflect that.

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?

Generally, it is positive that the risks and challenges set out in the draft Policy reflect the role technology platforms now play in the media market and supply chains. However, the challenges posed by Gen AI should be featured more prominently. We would also suggest that viability challenges are not just confined to regional, local, community and niche media services; the draft Policy should reflect viability challenges in national media provision too.

We would also welcome more nuance in the presentation of the risks of greater concentration of media services to plurality. Consolidation can bring benefits to the media market by improving profitability, increasing economies of scale, and improving the ability of a company to innovate, invest and take risks, and it can help to sustain plural provision where otherwise a media service would fail. As currently drafted, the potential positive consequences of consolidation risks being overlooked.

Of course, consolidation can present a risk to media pluralism, which is why there are competition impact and media plurality tests in place for media mergers, as set out in An Coimisiún's Ownership and Control Policy. However, we consider that, given changes in the media market now reflected in the draft media pluralism position, An Coimisiún could also explore reflecting those same market changes in a modernised Ownership and Control Policy, including considering the diversity and plurality of media ownership on a cross-media basis.

Beyond these specific points, it is difficult to engage with this section because the way it has been presented (i.e. in a table) means that it is very high level and lacks crucial detail. For example, it is not clear who An Coimisiún defines as 'online intermediaries', and whether AI firms, social media platforms, video-on-demand platforms, or search engines are in scope. It is also unclear which risks An Coimisiún considers more acute than others (all fifteen risks are presented as equal) and it is not clear whether it considers some of the risks to be interrelated (e.g. the power of online intermediaries and viability challenges).

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?

An Coimisiún's focus on choice and innovation as outcome areas are particularly welcome. We strongly agree with the following lines: *"Availability of content does not equate to access to content. The availability of a range of services and content does not mean that users and audiences are accessing and using them, nor that they are fully informed about those services and content."*

But it is not clear how An Coimisiún plans to have a tangible impact on these outcome areas as it implements the policy. For example, under 'choice', An Coimisiún's proposed activities are all media literacy activities. While media literacy is a valuable tool, in isolation it will not change the underlying structural and market issues that ultimately shape the services and content available to audiences. An Coimisiún should take a more ambitious approach to designing activities that will have an impact on the structural issues that affect the choice accessible to audiences.

Considering ways to support advertising-funded media businesses, beyond State funding schemes, is essential to affecting change in several of the outcome areas. Under 'journalism', An Coimisiún should consider other levers it could pull to support the viability of local, regional and national news media services. This could include modernising its approach to commercial rules, or ruling out the introduction of new advertising restrictions. Similarly, under 'innovation', while we strongly welcome the focus on this outcome area, the drafting should explicitly reflect that commercial media organisations need to be sustainable to invest in new technologies, distribution methods and so on, and consider alternative means to support sustainability.

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?

As above, while we broadly agree with the areas of focus, it is unclear to us how An Coimisiún will use the indicators outlined to achieve tangible change on structural issues - particularly access, exposure and choice.

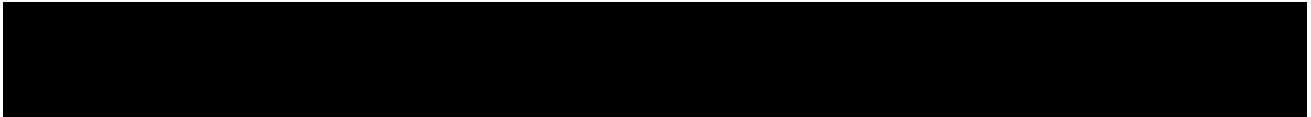
It appears that most of the indicators focus on the provision of information from well-established and long-regulated stakeholders, like broadcasters, rather than technology platforms. It is also not clear whether the adoption of the indicators will increase the information provision burden on regulated stakeholders. We would welcome An Coimisiún engaging directly with stakeholders in the design of indicators.

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

As set out in response to Q6, we have reservations about how effective An Coimisiún's suggested implementation activities are likely to be. We encourage An Coimisiún to focus on the structural and market challenges facing media organisations to secure a strong, plural media landscape.

- **Financial sustainability:** An Coimisiún should consider means to better support the viability of commercial media businesses, including considering the levers at its disposal in its Commercial Codes and Rules. It should also consider the role it can play in supporting the media sector as it faces the challenges posed by Gen AI firms. We strongly encourage An Coimisiún to consider policy options beyond State funding schemes, to avoid an outcome whereby the media sector becomes increasingly dependent on such funding to the detriment of plurality and independent provision.
- **Access to audiences:** An Coimisiún should consider measures it can take to secure media services' access to audiences in the face of increased intermediation. This could include introducing findability and accessibility requirements for Irish-licensed radio stations on voice-activated devices, and ensuring there is proper attribution and remuneration for the use of media content by Gen AI firms.

October 2025



NewsBrands Ireland Submission

Coimisiún na Meán Consultation on Draft Media Pluralism Policy

24 October 2025

Introduction

NewsBrands Ireland, as the representative body for Ireland's leading multi-platform news publishers, welcomes the opportunity to make this submission in respect of the draft Policy on media pluralism that has been published by Coimisiún na Meán.

NewsBrands Ireland's remit is to promote the fundamental role of a free and independent press, to support a legislative framework that enables sustainable public service journalism, and to ensure a fair and competitive media environment for all news publishers. Our members also invest in a dedicated news literacy and student journalism programme for transition year students – Young Journalist Ireland. The initiative is designed to build media literacy, foster critical thinking, and inspire the next generation of Irish journalists. Through classroom resources and mentorship from professional journalists and editors, students learn to assess information sources, identify misinformation, and create original, high-quality journalism.

We share An Coimisiún's commitment to safeguarding a diverse and pluralistic media environment in Ireland. A healthy democracy depends on citizens having access to a wide range of voices, perspectives and trusted sources of information, and we recognise the role that An Coimisiún plays in supporting this goal.

However, we believe the draft Policy, unintentionally, risks overlooking and even exacerbating some of the core challenges facing independent journalism in Ireland. In short, we believe this Policy positions Coimisiún na Meán as the arbiter of media diversity rather than as an enabler of market sustainability. The test of a media pluralism policy is not how effectively it measures pluralism and diversity, but how effectively it sustains it.

We are concerned that the draft Policy does not give adequate attention to the impact of artificial intelligence (AI) on journalism and copyright. It fails to confront AI or platform-driven exploitation of news content, leaving copyright, transparency, remuneration and arbitration unresolved.

We are concerned that the extensive public funding of State broadcasters without comparable measures for the independent sector will create an unfair and imbalanced market in which publicly funded media is seen as the central guarantor of pluralism. Economic support for the independent or private journalistic ecosystem is limited and limiting in the schemes that have been rolled out so far.

We are concerned that the expansion of the regulatory scope of An Coimisiún will undermine the independence of the press in Ireland. This must be protected with care and it is vital that any pluralism policy recognises the distinct position of independent press publishers. Our members operate within a well-established system of self-regulation through the Press Council of Ireland and the Office of the Press Ombudsman, which guarantees high standards of ethics, accuracy, and accountability. A light-touch, supportive approach is essential in order to safeguard editorial independence and avoid imposing unnecessary reporting, compliance, or governance obligations.

At the same time, a more interventionist and proactive approach is needed in relation to global digital platforms, whose commercial models rely heavily on the use of journalistic content without fair remuneration.

We call on An Coimisiún to: strengthen its approach to AI and platform accountability, including support for new national policies to guarantee publishers are compensated for the use of their content by AI companies and platforms; to ensure equitable support for independent and commercial media alongside public service broadcasters and to provide guarantees that regulatory oversight will not encroach on editorial freedom.

We have set out below our responses to the various questions that have been raised. While this submission was prepared to respond to the questions posed, we believe that there are also broader issues within the draft Policy that require attention in advance of the next iteration. These issues go beyond the scope of the individual questions but are central to ensuring that the final Policy is coherent, comprehensive, and fit for purpose.

In particular, we wish to highlight the following points:

- the current draft appears to follow too closely the structure and language of the earlier Broadcasting Authority of Ireland policy. As a result, the wording remains framed primarily from a broadcasting perspective and does not adequately encompass other forms of media which are essential components of a pluralistic media environment;
- the draft Policy includes several tables presented in three columns, which give the impression that the items on each line are related. On closer reading, however, the items appear unrelated and arranged arbitrarily. This presentation makes the document difficult to interpret and detracts from the clarity and accessibility of the policy as a whole.

These examples illustrate that, in addition to addressing specific consultation questions, a more general review of the draft Policy will be required. Such a review should ensure that the Policy is conceptually consistent, clearly presented, and appropriately broad in scope to reflect the full range of media operating in Ireland today.

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?

We welcome the recognition in the draft Policy of the centrality of media pluralism to a functioning democracy. However, we believe An Coimisiún's role should be clearly focused on enabling pluralism through structural and market measures, not by extending regulatory control over editorial or journalistic activity. The Commission's most urgent role lies in tackling structural threats to pluralism arising from: the dominance of online platforms in distributing and monetising news; the use of journalistic content by artificial-intelligence systems without licence or compensation; and the growing financial fragility of independent and regional media.

Our members invest significant time, money, and resources in producing high-quality journalism that adheres to rigorous ethical and professional standards. This work delivers fact-checked information, holds those in positions of power accountable, and keeps citizens informed and engaged in the issues shaping our society. Yet while publishers shoulder these costs, tech platforms benefit disproportionately from this investment.

News content is a driver of engagement on digital platforms, helping them to attract and retain users. That engagement, in turn, generates valuable streams of user data which platforms monetise through highly profitable advertising models. Despite the central role that trusted journalism plays, publishers are not compensated for the value extracted from their content. An Coimisiún should adopt a more interventionist stance towards global digital platforms, emphasising transparency, accountability, and the establishment of effective mechanisms to secure fair remuneration for the use of publishers' content.

Against this backdrop, the role of Coimisiún na Meán must be clear. In attempting to secure media plurality, it should not become engaged in regulatory intervention which inadvertently encroaches upon editorial independence. When it comes to independent press publishers, the Commission should act as a facilitator, not an overseer. Any move towards detailed supervision of editorial or organisational matters would risk encroaching on the freedom and independence that are central to a plural media environment.

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?

The draft Policy takes a broader view of pluralism than that contained in the Broadcasting Authority of Ireland's Policy, encompassing diversity across content, ownership, platforms, language, and accessibility. This broadened approach is welcome. However, what this definition does not do in our view is to reflect the diversity's dependence on the financial viability of independent media organisations. To that end, we would like the definition to make specific reference to the viability of independent media outlets, to ensure that State funded broadcasters cannot distort the market and to help secure compensation for publishers for the use of their content in AI and other digital platforms.

Specifically in relation to sector-specific diversity, we believe pluralism of ownership and content must not be satisfied solely by diversity across unrelated sectors. For example, having all print media owned by one entity and all broadcast or online media by another would still constitute a significant concentration of control, which undermines democratic discourse. There must be meaningful diversity *within* each sector to ensure genuine plurality of voices and perspectives.

We also emphasise that any definition of pluralism should be grounded in editorial independence. Pluralism is not merely a matter of quantity or variety; it is fundamentally about the freedom of publishers to operate without interference. This requires safeguarding publishers from excessive regulatory intrusion while recognising the need for proportionate oversight of large digital platforms that profit from the use of media content without remuneration.

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

The draft Policy recognises the importance of media pluralism, but there should be stronger emphasis on the role of independent, free media as a cornerstone of pluralism and democracy. We believe the Policy should go further in recognising the economic fragility of pluralism: the draft Policy underestimates how closely media pluralism now depends on economic, technological, and regulatory conditions beyond the traditional media landscape.

Independent publishers are essential to ensuring a diversity of voices, providing fact-checked information, and enabling public accountability. These functions are fundamental to the healthy functioning of democracy and to the ability of citizens to make informed decisions.

In a media environment dominated by global platforms, traditional publishers face increasing challenges and declining revenues. These pressures threaten the sustainability of pluralistic media. The Policy should more clearly recognise this dimension and outline how it will be safeguarded in practice.

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?

The draft Policy identifies a range of risks and challenges to media pluralism, including ownership concentration, misinformation, and digital disruption. However, we believe the most pressing issues facing the sector should also be identified and specifically addressed.

One pressing concern is the failure at both national and European level to provide clear mechanisms for licensing agreements or to ensure remuneration under Article 15 of the Directive on Copyright in the Digital Single Market. Without such mechanisms, publishers face the ongoing misappropriation of their content by large online platforms without fair compensation. This is one of the most significant threats to the sustainability of independent journalism.

It is our view that there is insufficient attention given to the challenges posed by artificial intelligence. The unauthorised use of journalistic content to train and ground AI models is eroding copyright and undermining the viability of traditional media. Without robust safeguards and fair payment arrangements, AI could amplify the misappropriation of content and weaken the ability of independent publishers to invest in high-quality journalism. We ask An Coimisiún to explicitly recognise AI content appropriation and non-compliance with copyright laws as material risks to pluralism, the importance of transparency obligations for AI companies on data sources and training content, and to highlight the need for intervention to ensure fair payment to publishers.

The challenges posed by AI were recently acknowledged by the European Parliament, who have committed to examining the AI threat to media pluralism. In a Press Release regarding this commitment, Michael McNamara MEP of the Renew Europe Group stated as follows: *“When these systems summarise information directly in the search interface, they divert users away from original news sources which starve independent media of visibility and revenue, weakening the financial sustainability of public interest journalism. This in turn threatens media pluralism and, by extension, democratic discourse.”* He further noted that *“When a single platform can decide whether journalism*

is seen or buried behind an AI-generated summary, that is a systemic risk to the media pluralism upon which our democracy depends. Parliament cannot remain a bystander while media ecosystems are quietly hollowed out by design choices made in Silicon Valley."

AI Overview is fundamentally disrupting the core business model of the media businesses of advertising and subscriptions. A recent analysis of Google search impressions and clicks to NewsBrands member publisher websites shows decline of between 15% and 30%, as people get their answers from AI, in some cases with AI platforms scraping behind paywalls and illegally accessing content. Digital Content Next, a US-based trade association, which represents the New York Times, Washington Post, News Corp and others, published [research findings](#) from its members in August 2025. The research found that year-on-year traffic from Google Search to premium publishers was down 10% over just eight weeks. A study by [Pew Research Centre](#), a US thinktank, conducted in March 2025 showed a significant impact on referral traffic from Google AI Overviews. A month-long survey of almost 69,000 Google searches found users only clicked a link under an AI summary once every 100 times.

The European Commission has just commenced an analysis of AI Overviews' potential effects on publishers. DG COMP has invited European publishers to provide granular data showing any change in traffic to their website, or other relevant metrics of users' engagement, in the period following the launch of AI Overview.

The potential distortion of competition through public funding for public service broadcasters should also be recognised. Without robust safeguards, such funding risks undermining a level playing field, to the detriment of independent news publishers.

Communities across the State are losing access to locally produced, independent news. This represents a critical erosion of democratic pluralism at the regional level. We would ask An Coimisiún to identify the loss of local reporting capacity as a national concern.

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

The vision articulated in the draft Policy is one that we broadly support. However, we believe that the accompanying objectives require closer scrutiny, particularly in how they frame the role of regulation.

Throughout the draft, there is a recurring focus on regulating the media landscape. While regulation is undoubtedly a tool available to Coimisiún na Meán, we are concerned by its presentation as an objective in itself, rather than a means to an end. Regulation should be instrumental, not aspirational.

From the perspective of our members, this distinction is critical. Over-regulation, especially when applied to editorial processes, risks undermining the very independence that pluralism seeks to protect. The media sector is already subject to extensive regulation and adding further layers of oversight, without clear boundaries or safeguards, could have a significant negative effect on editorial freedom and operational viability.

Regulation should be applied judiciously, with a clear understanding of its potential unintended consequences. We urge An Coimisiún to revisit the language of its objectives. Rather than positioning regulation as a goal, the Policy should focus on facilitation, support, and protection.

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?

We broadly support the outcome areas identified in the draft Policy. However, there are some important points that we believe should be addressed more directly.

First, we fully acknowledge the value of a strong public service media. At the same time, it is vital that the way in which public service media is supported and funded does not undermine the viability of private, independent publishers. If funding models are designed in a way that distorts the market or gives public service outlets an unfair advantage in advertising or digital distribution, the result will be to weaken the very plurality that the Policy seeks to protect. A balanced approach is needed, one that allows both public and private media to thrive alongside one another.

Second, we believe the draft Policy should more explicitly recognise the structural challenges facing traditional publishers. The dominance of global digital platforms in the advertising market has eroded the revenue base of Irish publishers. Audiences are increasingly consuming news through intermediaries such as search engines and social media, which reduces direct engagement with publishers and makes our members dependent on algorithms that we do not control. The implementation of Article 15 of the Copyright in the Digital Single Market Directive was intended to address this imbalance by ensuring fair remuneration when our members' content is used by online platforms. In practice, however, enforcement has been uneven and negotiations with large platforms remain highly asymmetrical. Without stronger regulatory backing, publishers cannot secure fair value for their work. Added to this are the rising costs of producing quality journalism, which are difficult to sustain in the current environment.

The Policy's outcome areas should therefore be expanded to include:

- Measures to ensure fair remuneration for the use of publishers' content by online platforms including AI companies and sanctions for breaches.
- Safeguards to ensure public service media funding does not distort competition.
- Supporting citizens to distinguish between professional journalism and unverified online content.

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?

We acknowledge the value of using indicators to assess progress towards media pluralism. However, the purpose of such indicators should be to measure the health of the news ecosystem, not the content it produces.

There is a risk of regulatory overreach if the development or use of indicators extends into areas that fall outside the proper remit of Coimisiún na Meán. As outlined above, publishers already operate under a robust framework of self-regulation. This system ensures high standards of journalistic ethics, accuracy, and accountability, while safeguarding editorial independence. Any attempt by Coimisiún na Meán to regulate or oversee areas already covered by these existing frameworks would risk duplication, confusion, and unnecessary administrative burdens.

In relation to our members, the most productive approach would be to focus on indicators that assess the broader ecosystem in which they operate. Examples might include:

- Financial indicators for independent media outlets that measure their ongoing viability.
- Indicators monitoring the impact of artificial intelligence, including the extent of unlicensed use of publisher content in AI model training, the degree to which AI-generated material affects the visibility, credibility or monetisation of original journalism and the extent to which AI contributes to disinformation and poor media literacy.
- Indicators of platform accountability, such as the level of transparency and engagement between platforms and press publishers, and the proportion of platform revenue derived from journalistic content.
- Indicators relating to Article 15 of the Copyright in the Digital Single Market Directive, such as the number of licensing agreements concluded between publishers and digital platforms, or the proportion of publishers who have received remuneration under such agreements.

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

The way in which the Policy is implemented will be as important as the Policy itself. Implementation should focus on enabling pluralism, not overseeing it. The Policy should focus on putting in place economic and technology reforms that sustain journalism, ensuring regulation is not creating an overly onerous burden for media outlets, co-designing indicators with industry stakeholders and respecting boundaries between structural oversight and the erosion of editorial independence.

We would encourage Coimisiún na Meán to adopt a collaborative approach, with ongoing dialogue with publishers and other stakeholders. This will help ensure that measures are practical and proportionate.

Ends / 24 October 2025

NewsBrands members:

The Irish Times DAC – Irish Examiner; The Irish Times; irishtimes.com; examiner.ie; breakingnews.ie

News Ireland: The Sunday Times; The Irish Sun; thetimes.ie; irishsun.ie

The Agricultural Trust: Farmers Journal; farmersjournal.ie

Business Post Group: Business Post; BusinessPost.ie

DMG Media Ireland: Irish Daily Mail; Irish Mail on Sunday; Evoke.ie; Extra.ie,

Reach Ireland: Irish Daily Star; Irish Daily Mirror; Irish Sunday Mirror; Buzz.ie; Mirror.ie

Ann Marie Lenihan

CEO NewsBrands Ireland

Submission to Coimisiún na Meán on draft Media Pluralism Policy

October 2025

The Pro Life Campaign thanks Coimisiún na Meán for the opportunity to comment on the draft Media Pluralism Policy and on the wider question of diversity in media ownership, content, and access.

The goal of genuine media pluralism is both necessary and commendable. However, lofty principles mean little unless those responsible for implementing them demonstrate genuine commitment and integrity in trying to ensure they are given effect. In our experience, Coimisiún na Meán has so far failed to inspire public confidence that it understands, much less protects, true pluralism and diversity in Ireland's media environment.

Coimisiún na Meán is entrusted with a crucial public responsibility: to act as Ireland's media watchdog, ensuring balance, fairness, and integrity in the nation's news coverage.

In parallel, it administers millions of euros in public funds to media outlets to promote what it describes as "high-quality, trusted and independent news." Those dual functions create an unavoidable conflict of interest. It is impossible to act as an impartial regulator while simultaneously distributing vast sums of money to the very bodies one is meant to regulate.

This arrangement undermines credibility and calls into question every claim of independence or objectivity. The power to allocate substantial funding gives Coimisiún na Meán immense influence over which voices are amplified and which are excluded. Such control inevitably shapes the national conversation and restricts genuine diversity of thought.

The question must be asked plainly: how can an organisation charged with safeguarding impartiality also serve as a financier of the same outlets whose output it oversees? That contradiction strikes at the heart of trust and accountability. It is not a procedural flaw; it is a structural one.

Our experience on the abortion issue illustrates this imbalance starkly. Approximately 95 percent of RTÉ's output on abortion presents a single, 'pro choice' perspective. That overwhelming bias should alarm any regulator genuinely committed to pluralism.

Yet when the Pro Life Campaign and others submitted formal complaints in 2024 about an RTÉ Investigates programme – a one hour and five minute broadcast exclusively on abortion that excluded even a single pro life voice – Coimisiún na Meán concluded that the programme met all journalistic standards and didn't find a single thing wrong with it. With respect, that decision was indefensible. It deepened public cynicism about your organisation's neutrality and reinforced the perception of ideological bias within Coimisiún na Meán's ranks.

This was not an isolated case. Similar determinations on comparable complaints reveal a consistent pattern: a reluctance to confront bias when it aligns with dominant or fashionable narratives. That pattern erodes public trust and betrays the very concept of media pluralism the Commission claims to defend.

With respect, we must ask: how many individuals representing pro life or broadly conservative viewpoints have been invited into the core of Coimisiún na Meán's deliberative structures? Consultation at arm's length is not the same as inclusion. True pluralism demands that dissenting perspectives are not merely tolerated but actively engaged at the level where decisions are made.

Ireland deserves a regulator that embodies fairness, independence, and courage – one that resists ideological conformity and ensures all citizens are served, not just the views of a chosen elite. Until Coimisiún na Meán addresses its internal blind spots and the inherent conflicts in its current role, "media pluralism" will remain a slogan rather than a lived reality.

We wish the Commission well in its deliberations and stand ready to contribute constructively to any genuine effort to broaden diversity and restore public trust in Ireland's media.

Ends

I, Maurice Fitzgerald, Shanbally, County Cork, submit the following in relation to the consultation:

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?

Answer: The predominance and dictatorship of RTÉ has crippled other forms of media. RTÉ is a media monopoly created by the TV licence, and as a result affect the media landscape to an enormous extent in the country and pluralism. They have a detrimental and unbalanced effect on other media such as community radio. It should be crucial in any draft documents to state RTÉ's profound effect on the media in this country. It is crucial that other forms of media get adequate resources rather than RTÉ getting the lion's share. CnaM should be critical of RTE's media power when formulating policy and be aware of RTE's power to decide the direction of media in this country.

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?

Answer: Media should not push any agenda, but just be balanced.

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

Answer: It is very important to have a balanced outlook. We all know what happened with Covid 19 and the total lack of tolerance of others' views.

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?

No Answer.

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

No Answer.

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?

No Answer.

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?

No Answer.

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

Answer: Actively implement policy rather than talking shops.

You may publish my submission without further asking.

Technology Ireland view on Coimisiún na Meán's (CnaM) draft Media Pluralism Policy

24 October 2025



Technology Ireland, the Ibec group representing the technology industry, welcomes the opportunity to comment on Coimisiún na Meán's (CnaM) draft media pluralism policy and supports its core objective of safeguarding media pluralism. For this policy to be appropriate to the modern digital environment, we believe success hinges on three key areas: adherence to regulatory coherence, adopting a balanced approach to innovation, and ensuring measurement is efficient.

1. Coherence and a proportionate framework

The primary challenge for this policy is its interaction with the complex EU digital framework, including the EMFA, DSA, DMA, and AVMSD. Increasingly, industry is subject to an overlapping and duplicative set of obligations.

Clarity of scope is essential. We support the policy's four-pillar definition of pluralism. However, to maintain consistency with EU law, the policy should be precisely aligned with the EMFA and AVMSD.

2. Risks, Challenges, and Innovation

Regulatory fragmentation should be considered in the context of the list of risks to pluralism. Overlapping EU and national obligations create a significant risk in themselves, increasing compliance costs and discouraging innovation, which indirectly harms pluralism by limiting the ability of smaller, cross-border services to operate in the market.

We encourage a more balanced view that recognises the positive role of technology providers in expanding the diversity of voices and facilitating access for new digital entrants.

To that end, we support the policy's focus on innovation. To make this work effectively, CnaM should:

1. Ensure any new national initiatives on transparency or discoverability are coordinated with the Digital Services Act (DSA) to ensure they complement, rather than duplicate, existing EU-level platform duties.
2. Ensure Fairness. All innovation supports, grants, or "prominence" initiatives must be provider-neutral, giving equal access to traditional broadcasters, online publishers, and new digital-first services.
3. Strengthen Foundations. Promote practical measures like interoperability and digital skills development within the media sector.

3. Efficient and Meaningful Measurement

CnaM should clarify the data sources and scope for measurement. It is important to differentiate between editorial audience metrics and broader platform analytics.

All transparency and reporting expectations must be aligned with existing standards, particularly those in the DSA, to avoid duplicative reporting burdens on industry.

By prioritising regulatory coherence, a balanced view of innovation and efficient measurement, CnaM can successfully achieve its pluralism objectives in an open and competitive digital ecosystem.

Re: Consultation on Coimisiún na Meán Media Pluralism Policy

Coimisiún na Meán,
1 Shelbourne Buildings,
Shelbourne Road,
Dublin 4,
Do4 NP20,

23/10/25

A chairde,

Leis seo, tá moltaí TG4 maidir leis an Media Pluralism Policy. Beidh muid an-sásta na pointí seo a phlé libh.

While the Policy refers to the European Media Freedom Act (EMFA) we believe that further references should be made to Coimisiún na Meán complying with the relevant provisions of EMFA in the exercise of its plurality functions in view of the requirements of Article 3, Article 5(1) and Article 5(3) of EMFA. This is particularly important due to the central role of Coimisiún na Meán in carrying out funding reviews and making funding recommendations to the Minister in respect of PSM under the Broadcasting Act 2009 (as amended) and as envisaged in the Broadcasting Amendment Bill 2025 (Bill).

In addition, in view of the proposed amendments to the Bill whereby Coimisiún na Meán “identifies” the performance commitments of TG4 and RTE and the proposed role which Coimisiún na Meán will have in respect of the TG4 and RTE Audience Councils, it is important to specify in the Media Pluralism Policy that Coimisiún na Meán will comply with EMFA in carrying out its functions which will ensure that functional and editorial independence of PSM is secured. The exercise by Coimisiún na Meán of its functions should not diminish the role of the board and management of PSM as this would undermine the longer-term strategic development of PSM and the functional and editorial independence of PSM contrary to the plurality requirements of EMFA.

Guaranteed Adequate Sustainable and Predictable Funding of PSM

Adequate sustainable and predictable funding must be guaranteed for PSM (Article 5(3) EMFA).

Article 5(3) of the EMFA provides:

Member States shall ensure that funding procedures for public service media providers are based on transparent and objective criteria laid down in advance. Those funding procedures shall guarantee that public service media providers have adequate, sustainable and predictable financial resources corresponding to the fulfilment of and the capacity to develop within their public service remit. Those financial resources shall be such that the editorial independence of public service media providers is safeguarded.

The Bill proposes a three-year funding review for PSM together with an annual review of the previous years funding of a PSM which will be carried out by Coimisiún na Meán. TG4 believes that these funding reviews must be carried out in compliance with Article 5(3) of EMFA which will guarantee adequate sustainable and predictable funding for PSM and ensure media plurality.

TG4 welcomes the additional funding announced in Budget 2026. TG4’s funding levels are reflected in our financial inability to invest in significant outputs in key areas of public service media which would enable us to deliver plurality of content.

EBU research shows that Ireland has one of the lowest funded EU PSM when looked at as percentage of GDP. Average funding within the EU is 0.14% of GDP, Ireland is 0.08% of GDP. Ireland is below Portugal, which is underfunded at 0.08%, at the same level as Malta, and just ahead of Romania 0.06% [Funding of Public Service Media | EBU](#) April 2025, pp 22- 23. While TG4 is grateful for the continued support from government and Coimisiún na Meán in increasing TG4's annual grant allowance, the funding level for TG4 is still below the required amount for delivery of Strategy 2023 – 2027 and for a PSM. TG4's 2026 funding represents only 27.25% of RTE's 2026 public funding. While RTE now has a three-year multiannual funding arrangement in place, this is not the case for TG4. Without multiannual funding TG4 cannot plan effectively for the future, commit to longer term investments and partnerships, which in today's rapidly evolving media environment are needed more than ever.

A failure to guarantee adequate sustainable and predictable funding as required by Article 5(3) of EMFA would result in a risk of continuous underfunding for TG4, contrary to the EMFA.

We have suggested language in the draft Media Pluralism Policy in relation to guaranteed adequate sustainable and predictable funding of PSM.

Editorial and Functional Independence of PSM

Editorial and Functional independence of public service media is required under Article 5(1) of EMFA in order to ensure plurality.

Article 5(1) provides as follows:

“Member States shall ensure that public service media providers are editorially and functionally independent and provide in an impartial manner a plurality of information and opinions to their audiences, in accordance with their public service remit as defined at national level in line with Protocol No 29”. (EU Protocol No 29 refers to the need for media pluralism and provides “ that the system of public broadcasting in the Member States is directly related to the democratic, social and cultural needs of each society and to the need to preserve media pluralism”).

The Bill proposes that the Strategy of a PSM will be based on the Performance Commitments which are identified by Coimisiún na Meán. The Bill also proposes that the funding recommended by Coimisiún na Meán will be based on those Performance Commitments. It is important that Coimisiún na Meán identifies the Performance Commitments of PSM in a manner which enables PSM to develop as required by Article 5(3) of EMFA and in a manner which secures the functional and editorial independence of PSM as required by Article 5(1) of EMFA.

In addition, it is important that Coimisiún na Meán exercises its functions in the Bill in relation to the PSM Audience Councils in a manner which is consistent with Article 5(1) of EMFA in order to secure the functional and editorial independence of PSM and secure media plurality.

We have suggested language in the draft Media Pluralism Policy in relation to editorial and functional independence of PSM.

Recommendation 7.1 of the Future of Media Commission Report

Recommendation 7.1 provides as follows: *TG4 should have independent editorial control over its news services. This will allow for greater plurality in news coverage and allow TG4 to provide an enhanced service to its audiences.*

We welcome additional funding announced in Budget 2026 to start a digital news service, however the Recommendation should be implemented without any further delay to promote plurality and in view of

Article 3 of EMFA which requires that recipients of media services have access to a plurality of editorially independent media content.

Article 3 of EMFA provides: “Member States shall respect the right of recipients of media services to have access to a plurality of editorially independent media content and ensure that framework conditions are in place in line with this Regulation to safeguard that right, to the benefit of free and democratic discourse. “

We have suggested language in the draft Media Pluralism Policy in relation to the implementation of Recommendation 7.1 and in relation to Article 3 EMFA.

Prominence: Prominence of public service media in interactive guides as required by s128C of the Broadcasting Act 2009 (as amended) should be implemented to promote plurality when the prominence provision is commenced by the Government.

This provision should be commenced and implemented without any further delay to promote plurality.

We have suggested language in the draft Media Pluralism Policy in relation to prominence.

Diversity of ownership, services, content, and exposure:

The draft Media Pluralism Policy provides that An Coimisiún considers media pluralism to be made up of a diversity of ownership, services, content, and exposure.

This is consistent with the Broadcasting Amendment Bill 2025 which defines plurality in Head 23 (s153A) as diversity of content and diversity of ownership.

There is no plurality in respect of Irish language news at present because there is no diversity of ownership. The RTE Irish language news and Nuacht TG4 are provided by RTE.

Likewise, there is no diversity of content. TG4 cannot supply diverse Irish language news content until such time as recommendation 7.1 of the FOMC report is implemented.

TG4 is unable to increase plurality in content genres and representation on screen due to a lack of financial resources. TG4 does not have sufficient resources to provide subtitles in Irish and English for all programming, or to increase ISL and audio description for TG4 content. Guaranteed adequate sustainable and predictable funding is required for TG4 to ensure diversity of Services and similarly to ensure diversity of exposure.

Commencement and implementation of s128C of the Broadcasting Act 2009 (as amended) is urgently required to ensure diversity of exposure of TG4 content.

We attach the draft Media Pluralism Policy with our suggestions tracked for your convenience. We hope this assists and we are happy to discuss.

We also attach a copy of the TG4 Submission dated 5/6/2025 to the Joint Oireachtas Committee which recently examined the Bill which provides further details on TG4’s feedback on the Bill and compliance with EMFA.

23 DF 2025

CRÍOCH



Coimisiún na Meán Consultation: Draft Media Pluralism Policy

Consultation response from the

Centre for Competition Policy

University of East Anglia, Norwich Research Park, Norwich NR4 7TJ

Date: 23/10/2025

Author:

- Dr Sally Broughton Micova, Associate Professor of Communications Policy and Politics, UEA & CERRE Academic Co-Director

This consultation response has been drafted by a named academic member of the Centre, who retain responsibility for its content.

The Centre for Competition Policy (CCP)

CCP is an independent research centre established in 2004. CCP's research programme explores competition policy and regulation from the perspective of economics, law, business and political science. CCP has close links with, but is independent of, regulatory authorities and private sector practitioners. The Centre produces a regular series of Working Papers, policy briefings and publications. An e-bulletin keeps academics and practitioners in touch with publications and events, and a lively programme of conferences, workshops and practitioner seminars takes place throughout the year. Further information about CCP is available at our website: www.competitionpolicy.ac.uk

I thank the Coimisiún na Meán for the opportunity to respond to its draft media pluralism policy. I have addressed below each of the questions posed.

Q1. The Coimisiún has set out the regulatory framework for its role clearly and the table is particularly useful for seeing how the Coimisiún has interpreted its role under this framework. The elements listed seem appropriate to the regulatory framework. However, given that media plurality depends significantly on the viability of a diversity of media actors, I urge the Coimisiún to consider putting into this policy a broader understanding of their responsibility to assess market conditions under the 2002 Competition Act so that it is more thoroughly in the service of ensuring that the regulatory environment sustains independent journalism, that high-quality, diverse and innovative programmes are provided, and the interests of the public are protected. Advertising spending has dramatically shifted away from media actors, and media services struggle to reach audiences and monetize their content, both of which are necessary for their continued viability.¹ Extensive evidence from across the EU demonstrates that local and regional media have suffered the most leaving 'deserts' in the provision of local news in many parts of the Union.² To address these trends, the Coimisiún should conduct regular assessments of conditions in the market that go beyond an assessment of ownership structures and also focus upon market dynamics and conditions in which the media operate.

It might be useful to consider that media producers are also as 'users' of online platforms, other digital services such as advertising intermediaries, and various distribution channels. They use online platforms and other services and technology for dissemination of content, selling and conducting advertising, and engaging with audiences. Assessment of their market conditions as users of these services would include investigation into their experiences with ad revenue sharing arrangements, user and content data sharing arrangements, and other contractual relationships with intermediaries and distribution channels.

As Sabine Jacques and I demonstrated in our research, a variety of usually pseudonymised user behaviour data and non-personal data about content and transactions is crucial for media to demonstrate the value of their advertising inventory to advertisers and to track their inventory's performance, but most of this has been out of their reach.³ The Digital Markets Act contains provisions that could even out the information imbalance somewhat but only if media (referred to in the DMA as 'publishers') make use of the provisions and are able to create value from the information, and only if advertisers agree.⁴ Investigating the Irish media's take up of and experience

¹ I. Nenadić u. a., „A decade of digital transformation: Pluralism between the media and digital platforms“, in *Media Pluralism in the Digital Era: Legal, Economic, Social, and Political Lessons Learnt from Europe* (2024), Scopus, <https://doi.org/10.4324/9781003437024-2>.

² Agnes Gulyas u. a., *Uncovering news deserts in Europe*, 2024.

³ Sally Broughton Micova and Sabine Jacques, „The Functions of Data in the Competition between Audiovisual Media and Video Sharing Platforms for Advertising“, *Journal of Information Policy* 10 (2020): 514–48, JSTOR, <https://doi.org/10.5325/jinfopoli.10.2020.0514>; Jan Krämer u. a., *The role of data for digital markets contestability: case studies and data access remedies* (Centre on Regulation in Europe asbl (CERRE), 2020).

⁴ Sally Broughton Micova, *DMA Transparency Requirements in Relation to Advertising* (Centre on Regulation in Europe (CERRE), 2022), https://cerre.eu/wp-content/uploads/2022/11/DMA_TransparencyRequirementsinAdvertising.pdf.

with the implementation of these transparency provisions in the DMA could be part of an assessment of market conditions.

Assessment of the market conditions for media would also need to address the gatekeeping of major online platforms and search engines between media and their audiences. Although some of the largest platforms have had partnerships with media actors that facilitated access to audiences in the past, it has been shown that these have always been unstable and at the discretion of the platforms.⁵ Examination of any of these relationships and media services' experiences with treatment by recommender systems could also contribute to an assessment of market conditions. Content moderation is an important role for online platforms and a place where they exercise power, therefore media services' experience with the content moderation of the large online platforms would also form part of any picture of market conditions. For example, the European Media Freedom Act's Article 18 requires very large online platforms to set up specific interface features and functionalities to mitigate the risk that media actors' access to their audiences would be limited through content moderation. An assessment of market conditions that recognised media as users of online platforms could include investigation into their experiences with these features and functionalities.

Q2. The Coimisiún's four-part definition of media pluralism reflects the broad understanding of media pluralism in academic literature. It very importantly includes the element of exposure, which it notes covers issues of discoverability and accessibility. Within this exposure diversity aspect, there should be an understanding that it is not only about exposure to a range of content, but also to a range of public interest content, public media spaces and the skills to evaluate information. As Helberger has argued, amidst the abundance of content now circulating, citizens' ability to compare information must be facilitated, and they may need to be given signals to participatory spaces for engaging in civic discourse and public debate.⁶ This understanding supports the Coimisiún's role in media literacy and reviewing public service media provision among others.

Q3. In addition to the good points already made in relation to the importance of media pluralism, the Coimisiún might consider also noting that ensuring a pluralistic media environment is a crucial way that the state fulfils its positive obligations stemming from the fundamental right to freedom of expression. The positive obligations stemming from this right and the role of media has been established by the ECtHR and in academic literature.⁷

Q4. The risks and challenges presented in the table in the policy are all very pertinent. There are two additional risks that might also be included. The first is the declining levels of trust in media that has been seen in the last decade.⁸ A variety of factors may be contributing to this, but several relate to

⁵ Merja Myllylahti, „It's a Dalliance! A Glance to the First Decade of the Digital Reader Revenue Market and How the Google's and Facebook's Payments Are Starting to Shape It“, *Digital Journalism* 12, Nr. 9 (2024): 1329–47, <https://doi.org/10.1080/21670811.2021.1965487>.

⁶ Natali Helberger, „Diversity by design“, *Journal of Information Policy* 1 (2011): 441–69.

⁷ for explanations see Judit Bayer, *Digital Media Regulation within the European Union: A Framework for a New Media Order*, 1. Aufl. (Nomos Verlagsgesellschaft mbH & Co. KG, 2024), <https://doi.org/10.5771/9783748945352>; Andrew T. Kenyon, *Democracy of Expression: Positive Free Speech and the Law* (Cambridge University Press, 2021).

⁸ Craig T. Robertson, „People are turning away from the news. Here's why it may be happening“, *Reuters Institute*, 21. Februar 2025, <https://reutersinstitute.politics.ox.ac.uk/news/people-are-turning-away->

the ways intermediaries and disinformation have muddled the relationship between media and their audiences making it harder to achieve a healthy balance between scepticism and blind faith. The second risk to media pluralism stems from the well evidenced and regrettable increasing levels of online harassment and violence against journalists. There is ample evidence that female journalists and those from minority backgrounds experience the most,⁹ and that journalists respond with self-censorship that sees them avoid covering whole topics or "beats",¹⁰ with significant implications for pluralism. Since the Coimisiún is already working on this issue, it seems apt to recognise it here as well.

One of the risks identified in the market conditions could be made clearer. The Coimisiún notes "Increasing concentration of media service providers and advertising revenues, particularly in digital advertising". The issue of concentration among media service providers is a separate issue from the concentration of power and advertising revenues in the digital advertising ecosystem. There may be a risk that of the advertising revenues that go to media service providers in general, there is a concentration among a few media services providers. There is also certainly a risk to media pluralism from the fact that the digital advertising playing field is inherently unlevel and controlled by a very small number of tech companies that also provide online platforms, and that total advertising revenues are being diverted away from media service providers.

Q5. The vision and objectives seem appropriate and admirable.

Q6. The list of outcome areas also seems appropriate and admirable. Having "inclusion" as an outcome area is very important and acknowledges that effective media pluralism is not only about diversity and choice but also about participation and shared spaces. I also particularly appreciate that the Coimisiún has include journalism as a separate area. I would perhaps also note the safety challenge I mentioned above in this section so that outcomes can be related to this challenge as well.

Q7. The Coimisiún has usefully set out key categories of indicators and types of information that might speak to these. In relation to transparency, I suggest also including information on publishers' awareness and use of the access to data on advertising pricing and metrics ensured under the

news-heres-why-it-may-be-happening; Nic Newman u. a., *Digital News Report 2024* (Reuters Institute for the Study of Journalism, 2024), <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/dnr-executive-summary>.

⁹ I Hiltunen u. a., „Harassed for Their Job: Exploring Factors That Render Journalists Prone to Harassment and Intimidation“, *JOURNALISM STUDIES* 25, Nr. 13 (2024): 1634–53, WOS:001261604500001, <https://doi.org/10.1080/1461670X.2024.2372432>; L Stahel, „Why Do Journalists Face Varying Degrees of Digital Hostility? Examining the Interplay Between Minority Identity and Celebrity Capital“, *COMMUNICATION RESEARCH* 50, Nr. 4 (2023): 410–52, WOS:000973327900001, <https://doi.org/10.1177/00936502231158426>.

¹⁰ D Jastramskis u. a., „Professional Threats and Self-Censorship in Lithuanian Journalism“, *FILSOFIJA-SOCIOLOGIJA* 34, Nr. 4 (2023): 422–31, WOS:001176005600008, <https://doi.org/10.6001/fil-soc.2023.34.4.8>; I Iqbal und S Chinnasamy, „Navigating Misogynistic Cyber Harassment: Impacts and Challenges Faced by Pakistani Female Journalists“, *SEARCH-JOURNAL OF MEDIA AND COMMUNICATION RESEARCH* 16, Nr. 2 (2024), WOS:001290238400001, <https://doi.org/10.58946/search-16.2.P4>; L Willnat u. a., „The American Journalist Under Attack: An Institution at Risk“, *JOURNALISM & MASS COMMUNICATION QUARTERLY*, advance online publication, 16. November 2024, WOS:001356393700001, <https://doi.org/10.1177/10776990241292080>.



transparency provisions of the Digital Markets Act (Art 5.10). I also suggest that, in relation to accountability, the Coimisiún attempt to gather information on the extent to which Irish media are able to use the designation as media service providers and associated appeals tools required by the European Media Freedom Act. This could be compliance data from the VLOPs and/or information from the media services about their awareness of and experience of using the special regime for content moderation.