Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2017 in the European Union, FYROM, Serbia & Turkey

Country Report: Denmark

Author: Kasper Netterstrøm
# TABLE OF CONTENT

1. About the Project ................................................................. 1
2. Introduction ........................................................................... 2
3. Results from the data collection: assessment of the risks to media pluralism 3
   3.1. Basic Protection (13% - low risk) ........................................ 4
   3.2. Market Plurality (50% - medium risk) ................................. 5
   3.3. Political Independence (21% - low risk) .............................. 6
   3.4. Social Inclusiveness (28% - low risk) ................................. 7
4. Conclusions ............................................................................ 8
   Annexe 1. Country Team .......................................................... 9
   Annexe 2. Group of Experts ..................................................... 9
1. ABOUT THE PROJECT

1.1 OVERVIEW OF THE PROJECT

The Media Pluralism Monitor (MPM) is a research tool that was designed to identify potential risks to media pluralism in the Member States of the European Union. This narrative report has been produced within the framework of the second EU-wide implementation of the MPM, carried out in 2017. The implementation was conducted in 28 EU Member States, Serbia, Former Yugoslav Republic of Macedonia (FYRoM) and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2 METHODOLOGICAL NOTE

The CMPF cooperated with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the cases of Malta and Italy where data collection was carried out centrally by the CMPF team. The research is based on a standardised questionnaire and apposite guidelines that were developed by the CMPF. The data collection was carried out between June and December 2017.

In Denmark, the CMPF partnered with Kasper Netterstrøm, media expert, who conducted the data collection and annotated the variables in the questionnaire and interviewed relevant experts. The scores assessing the risks for media pluralism were provided by the CMPF and calculated according to the algorithm developed by the Centre itself. The national report was reviewed by CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts).

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Figure 1 below).

<table>
<thead>
<tr>
<th>Basic Protection</th>
<th>Market Plurality</th>
<th>Political Independence</th>
<th>Social Inclusiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protection of freedom of expression</td>
<td>Transparency of media ownership</td>
<td>Political control over media outlets</td>
<td>Access to media for minorities</td>
</tr>
<tr>
<td>Protection of right to information</td>
<td>Media ownership concentration (horizontal)</td>
<td>Editorial autonomy</td>
<td>Access to media for local/ regional communities and for community media</td>
</tr>
<tr>
<td>Journalistic profession, standards and protection</td>
<td>Cross-media concentration of ownership and competition enforcement</td>
<td>Media and democratic electoral process</td>
<td>Access to media for people with disabilities</td>
</tr>
<tr>
<td>Independence and effectiveness of the media authority</td>
<td>Commercial &amp; owner influence over editorial content</td>
<td>State regulation of resources and support to media sector</td>
<td>Access to media for women</td>
</tr>
<tr>
<td>Universal reach of traditional media and access to the Internet</td>
<td>Media viability</td>
<td>Independence of PSM governance and funding</td>
<td>Media literacy</td>
</tr>
</tbody>
</table>

The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk. On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk. For more information on MPM methodology, see the CMPF report “Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2016 in EU-28, Montenegro and Turkey,” [http://cadmus.eui.eu/handle/1814/46786](http://cadmus.eui.eu/handle/1814/46786)

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, the MPM2017 scores may not be fully comparable with MPM2016 ones. For more details, see the CMPF report on MPM2017, soon available on [http://cmpf.eui.eu/media-pluralism-monitor/](http://cmpf.eui.eu/media-pluralism-monitor/)
2. INTRODUCTION

Denmark is a small European country of around 5.7 million inhabitants located north of Germany and covering an area of 42,925 km². The official language is Danish which is closely connected to and mutually intelligible with Swedish and Norwegian. The fact that Danish is a relatively small language is an important element in understanding Danish media and cultural policy. Support for Danish media and cultural production is to a large extent driven by a political will (shared by most political parties, although the extent is debated) to support and uphold media in Danish language. Using Gösta Esping-Andersen's classic typology of welfare regimes, Denmark can be classified as a universal welfare state, although the country also shares some elements of the corporative model especially in the functioning of the pension schemes.

Danish media is dominated by private newspapers on one hand and heavy state involvement in the audio-visual media on the other. The main newspapers reflect the political spectrum and the country's political history. Berlingske is the eldest, dating back to the mid 18th century, and represents an urbane business-friendly conservatism. Politiken was founded in the late 19th by prominent members of the liberal intelligentsia and is today the main centre-left newspaper. Jyllandsposten – “the Jutlandic Post” – embodies a more rural and cultural conservatism (very critical of immigration e.g.). Information is originally a newspaper founded during the second world war as a part of the resistance to German occupation but became in the 1970's the newspaper of the left and still is today. As elsewhere in the world, the print readership has declined, but from a relatively higher level compared to other European countries. The major Danish newspapers have all introduced some kind of pay wall for the online content, but none of them have seen online revenue increase to an extent enabling it to replace the income from print. On top of that they are losing the advertising market to Facebook and Google.

Audio-visual media is dominated by the state. Danish Broadcasting Corporation (DR) is until today financed by a mandatory license fee (negotiations are currently taken place to replace the license fee with a lump sum tax). DR is a dominant player in radio and the TV market, as well on the internet. The second most important TV channel is TV2, which is quasi-private. It has commercials and it is run as a commercial company, although the station also receives a part of the public service funds for which it produces news and Danish language TV-shows. TV2 is also known for its network of regional news stations. The most important online news sites are TV2, DR and the big newspapers. Denmark has seen the emergence of newspapers founded as online only (for example Altinget), but it is mainly niche media.

Denmark does not have specific laws regulating ownership of media, instead the media market is regulated by the normal competition laws. Denmark has not had problems with political affiliated businessmen who have taken control over central media outlets and used it for direct or indirect political influence. This is due to the large public service sector and to the tradition of foundation ownership. Politiken and Jyllandsposten are for example owned by a foundation that does not need to generate a profit for shareholders but does only have public interest considerations in mind. Another feature of the Danish media landscape is the availability of public funds for media start-ups and specific projects.

---

3. RESULTS FROM THE DATA COLLECTION: ASSESSMENT OF THE RISKS TO MEDIA PLURALISM

The overall result for Denmark is a low risk to media pluralism in three areas: Basic Protection, Political Independence, and Social Inclusiveness. The Market Plurality area is in the medium risk band.

The report shows a high risk regarding media ownership concentration and a medium risk regarding cross-media ownership. This is due to the fact that most audiovisual media are somehow supported by the state. Whether one sees this as a risk is related to how much faith one puts in the Danish principle of “arm’s length”, the fact that politicians allocate resources but do not interfere in actual programming and editorial decisions. Regarding Social Inclusiveness, the overall risk is low. Denmark does not use rigid quota systems, but does instead rely on more soft measures to promote diversity. So far with a relative success.

The biggest threat to the independence of Danish media is the government plans to abolish the license fee for public service media and replace it with a special tax. This might constitute a risk for the independence of public service media, but it all depends on the exact outcome of the negotiations between the ruling party and the other parties in parliament that are currently taking place.
3.1 BASIC PROTECTION (13% - LOW RISK)

The Basic Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have competence to regulate the media sector; and the reach of traditional media and access to the Internet.

The overall result for the Basic Protection area in Denmark is a low risk in all of the indicators covered by the MPM. Regarding the protection of freedom of expression (low risk, 3%) and freedom of information (low risk, 31%), the low risk scores are due to the relative robustness of Danish democracy in general. The indicator on the Journalistic profession, standards and protection shows a low risk (13%). This is due to the strong organization of Danish journalists and the relatively free access to the profession.

The indicator on the Independence and effectiveness of the media authority has an extremely low risk (3%), because the Danish Radio and TV Board as well as the Media Committee's independence vis-à-vis the government, what eliminates political interference in the regulatory bodies.

The indicator on Universal reach of traditional media and access to internet has a low risk in Denmark (13%). DR reaches almost all citizens with its TV and radio channels. 98% of Danes use DR during a given week. Denmark also has a very high internet penetration throughout the country.
3.2 MARKET PLURALITY (50% - MEDIUM RISK)

The Market Plurality indicators examine the existence and effectiveness of the implementation of transparency and disclosure provisions with regard to media ownership. In addition, they assess the existence and effectiveness of regulatory safeguards to prevent horizontal and cross-media concentration of ownership and the role of competition enforcement and State aid control in protecting media pluralism. Moreover, they seek to evaluate the viability of the media market under examination as well as whether and if so, to what extent commercial forces, including media owners and advertisers, influence editorial decision-making.

![Denmark: Market Plurality Area](image)

The indicator on transparency of media ownership scores at medium risk (50%). Ownership above 20% of the shares has to be included in the annual accounts in all companies – including media companies, but there are no particular requirements for media companies. This results in a medium risk of 50% for transparency of media ownership in Denmark. The risk for Commercial and owner influence over editorial content is relatively low (17%) due to the fact that no owners of newspapers have formal ties to the political system.

In Denmark, as mentioned above there are no separate rules for ownership of media companies, media outlets are subject simply to the general competition laws. Public service media dominates audiovisual media. This is what creates the high risk for media ownership concentration (73%) and cross media concentration (81%). The result must be seen in the context of high state involvement in the media market and the relative strength of the “arm’s length” principle of the Danish regulatory bodies.

The indicator on commercial and owner influence over editorial content scores low risk (17%). There are mechanisms granting social protection to journalists in case of changes of ownership or editorial line, and self-regulation is clear on the incompatibility between exercising journalism and performing activities in the field of advertising.

The indicator on Media viability scores a low risk of 30%. There is a quite limited number of consumers who can pay for and finance media content.
3.3 POLITICAL INDEPENDENCE (21% - LOW RISK)

The Political Independence indicators assess the existence and effectiveness of regulatory safeguards against political bias and control over the media outlets, news agencies and distribution networks. They are also concerned with the existence and effectiveness of self-regulation in ensuring editorial independence. Moreover, they seek to evaluate the influence of the State (and, more generally, of political power) over the functioning of the media market and the independence of public service media.

The overall result of the Political Independence area is a relatively low risk.

The indicator Political independence of media scores a medium risk of 50% due to the lack of specific regulation on conflict of interests between owners of media and government officials, and on direct ownership of media by politicians and political parties. It remains a relatively theoretical risk, as long as no political control is observed in practice.

The indicator on Editorial autonomy shows a 25% (low) risk, also because of the lack of specific regulation. But overall, there has not been any cases of editors who have been removed for political reasons.

An extremely low score is observed (3%) when it comes to Media and the democratic electoral process. This is the result of the fair coverage of the electoral process by PSM and print media. It has to be mentioned that Denmark has a ban on political advertisements in TV and radio.

The indicator on State regulation of resources and support to the media sector has a low risk (17%) due to the clear legislation on media support. Private media can apply for funds if they live up to certain criteria. The criteria are both related to innovation of new formats and to the quality of the news production itself.

The indicator on the Independence of PSM governance has a low risk in Denmark (8%) due to the “arm’s length principle”. However, the reform of the public service license fee that is currently negotiated by the government might constitute a future risk. The government wants to replace it with a special tax, which could make the PSM more sensible to political pressure. But, it has to be emphasized that the content of the final law is not yet known.
3.4 SOCIAL INCLUSIVENESS (28% - HIGH RISK)

The Social Inclusiveness indicators are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country’s media literacy environment, as well as the digital skills of the overall population.

The indicator on Access to media for minorities is at a medium risk (63%). This is mainly due to the lack of programs for minority groups. DR has e.g. stopped producing news in immigrant languages such as Arabic and Somali because of a very limited number of users. PSM have editorial autonomy and decide who should have airtime or not. The only way PSM moves towards greater diversity is through the general awareness of the importance of diversity, not through any legal requirements.

The low risk for Access to media for local/regional communities and for community media (31% risk score) is related to the fact that Denmark has many local and regional newspapers as well as the network of public service regional TV-stations produced by TV2.

The indicator on Access to media for people with disabilities has a low risk (13%). This is due to the fact that the public service contract explicitly states the need for addressing these issues. There is also an ongoing dialogue between the organisations representing people with disabilities and the PSM.

The indicator on access to media for women scores low risk (30%). Women are still underrepresented compared to men in the news, but women are well represented in the key positions in PSM.

The media literacy indicator is at a low risk (3%). Media literacy is an integrated part of the curriculum of both primary and secondary education – and in the colleges where teachers are educated. In Denmark the term for media literacy is “mediedannelse”. “Dannelse” is comparable to the German term “Bildung” and entails thus a quiet broad understanding of media literacy.
4. CONCLUSIONS

The MPM analysis for Denmark shows a low risk for media pluralism in three areas covered by the study, basic protection, political independence, social inclusiveness and a medium risk for market plurality.

The medium risk in the market plurality area is related to the fact that Denmark is a relatively small media market with a high degree of state involvement. This is again partly due to relatively limited number of Danish speakers. A small market produces higher risks for concentration.

The low risk related to media pluralism in Denmark is due to the general protection of citizen rights as well as the rights of journalists, and the institutionalization of the “arm’s length principle” between the politicians allocating the resources for PSM and the editorial decisions.

However, the government’s plans to replace the license fee for PSM with a special tax might pose some risks in the future. Given the other low risks, the main policy recommendation is therefore that the current license fee system is kept in place or only be replaced with a system that maintains the same high degree of “arm’s lengths” between politicians and PSM.
ANNEXE 1. COUNTRY TEAM

<table>
<thead>
<tr>
<th>First name</th>
<th>Last name</th>
<th>Position</th>
<th>Institution</th>
<th>MPM2017 CT Leader</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kasper</td>
<td>Netterstrøm</td>
<td>independent</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

ANNEXE 2. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

<table>
<thead>
<tr>
<th>First name</th>
<th>Last name</th>
<th>Position</th>
<th>Institution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Peter</td>
<td>Skov</td>
<td></td>
<td>Danmarks Radio</td>
</tr>
<tr>
<td>Per</td>
<td>Jauert</td>
<td></td>
<td>Aarhus University</td>
</tr>
<tr>
<td>Holger</td>
<td>Rosendal</td>
<td></td>
<td>Danske Medier</td>
</tr>
<tr>
<td>Henrik</td>
<td>Søndergaard</td>
<td></td>
<td>University of Copenhagen</td>
</tr>
</tbody>
</table>