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Monitoring Online Media Pluralism in Flanders:
lessons drawn from DIAMOND SBO studies

Ingrid Lambrecht and Peggy Valcke

European University Institute

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EUI Working Paper **RSCAS** 2019/67

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European University Institute

Badia Fiesolana

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Abstract

This paper was written in the context of the DIAMOND SBO project. Against the background of a growing concern over increasing market power by a handful of widely used online services, this paper starts from the assumption that such a situation may limit citizens' access to or consumption of a diverse set of media content. Consequently, this would have a negative impact on citizens' fundamental right of access to information, which would affect media pluralism in general.

This assumption sparks the question if the rise of such new digital media services necessitates a reconceptualization of existing monitoring frameworks for media pluralism. The development of practical indicators that are capable of measuring media pluralism in the online environment would allow more accurate monitoring of the situation. This could introduce more transparency of the online media environment, in turn enabling public scrutiny. Considering the complex nature of this environment however, close cooperation and interaction with various stakeholders based on a minimal consensus and understanding of the issues at hand are essential while developing relevant indicators. Therefore, this paper integrates the results of empirical studies with various stakeholders with the evaluation of the legal and policy framework for monitoring media pluralism in and for the Flemish community in Belgium specifically.

Keywords

Media pluralism online, market concentration, right to information, online media transparency, Belgium, Flanders.

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Introduction

The aim of this paper is to provide a summary of the results from several studies performed in the framework of the DIAMOND SBO project.¹ One of the valorisation goals of the project is to develop a monitor capable of measuring online news diversity in Flanders. For the purpose of this monitor three subsequent studies have been carried out: (1) describing and analysing the relevant legal and policy documents, (2) describing and analysing both the relevant monitoring mechanisms in place and their specific indicators, and (3) involving stakeholders from practice to help identify which issues would require specific, tailored attention in an online context. This paper summarizes the results from these studies in a way which best reflects these monitoring mechanisms in place for Flanders and the areas where stakeholders see room for improvement concerning online media pluralism.

(1) The first section of the paper briefly discusses what the existing framework is for monitoring media pluralism online, both in regulation and in policy, with a focus on the role and competences of the Flemish Media Regulator. (2) The second section provides an overview of the monitoring mechanisms already in place in Flanders, starting with the monitor of the Flemish Media Regulator. This overview additionally specifically analyses the indicators relevant to measure online media and online news in terms of diversity and use. (3) The third section of the paper focuses on the results from several empirical studies: a survey, a debate and a co-creation workshop, each involving media experts and media stakeholders. This paper will present the main findings of all three studies combined and discuss how stakeholders would improve, complement or replace existing indicators. This section will finally provide a list of indicators put forward by the stakeholders. While it would require further studies to provide fine-tuned, practicable and comprehensive results, this paper may be considered a first step towards adapting our Flemish monitoring to the complex dynamics of the online environment.

1. Policy and regulation: the role of monitoring online media pluralism

a. Monitoring media pluralism in policy and regulation

Media pluralism is considered an intrinsic value of the freedom of expression and of press freedom, based on article 10 of the ECHR², as expressed by ECtHR case-law³, and as mirrored in article 11(2) of the EU Charter⁴. The ECtHR has concluded that freedom of expression can only truly be exercised in a pluralistic, free media environment, which in turn can only be guaranteed if a wide range of rights and freedoms are protected. Today, this environment extends to the online world, where opinions are

¹ DIAMOND SBO ('Diversity and Information Media: New Tools for a Multifaceted Public Debate') is a 4-year interdisciplinary and inter-university (KU Leuven, VUB and UA) research project funded by the Flemish government, examining three dimensions of diversity in journalistic practice: actors, topics and viewpoints. More information on our goals and output is available at: <https://soc.kuleuven.be/fsw/diamond>.

² 'Convention for the Protection of Human Rights and Fundamental Freedoms' (1950), <https://www.coe.int/en/web/conventions/full-list>.

³ Niels Rogge, Ellen Wauters, and Peggy Valcke, 'Van Een "Duty to Protect" Naar Een "Duty of Care". Mediapluralisme En Art. 10 EVRM.', *Tijdschrift Voor Mensenrechten*, no. 3 (2013): 7–10; Peggy Valcke, 'Looking For the User in Media Pluralism Regulation: Unraveling the Traditional Diversity Chain and Recent Trends of User Empowerment in European Media Regulation', *Journal of Information Policy*, no. 1 (2011): 287–320.

⁴ 'Charter of Fundamental Rights of the European Union', Pub. L. No. 2000/C 364/01 (2000), https://www.europarl.europa.eu/charter/pdf/text_en.pdf; Paolo Cavaliere, 'An Easter Egg in the Charter of Fundamental Rights: The European Union and the Rising Right to Pluralism', SSRN Scholarly Paper (Rochester, NY: Social Science Research Network, 2012), <https://papers.ssrn.com/abstract=2568683>.

increasingly shaped, and which presents traditional media with new challenges and opportunities of convergence.⁵

While it was never entirely off the EU political agenda, the topic of monitoring media pluralism made a re-appearance on the agenda of EU research and discussions⁶, sparked by debates on ‘fake news’ and disinformation⁷ and the role of digital intermediaries in the media eco-system⁸. With an increasingly converged media environment, opportunities for media pluralism arise in e.g. transparency, accountability, outreach, better access to a broader range of voices and viewpoints. However, this changing environment also challenges the core role that journalism and news distribution plays in our society. Closing newspapers and media concentrations of ownership are symptoms of the economic difficulties traditional media face.⁹ Digital services such as social media and platforms for disseminating content are new players in the media eco-system, bringing with them both opportunities and potential threats.¹⁰

That is why media pluralism takes on a different scope in the online environment. Measures and policies aimed at safeguarding media pluralism traditionally focus on the diversity of supply and distribution within the media eco-system.¹¹ The online environment however, enables and perhaps requires a new set of safeguards, such as monitoring actual consumption patterns and ensuring the diversity of exposure.¹² This evolving scope for safeguards also indicates the difficulty of defining the

⁵ Dominika Bychawska-Siniarska, *Protecting the Right to Freedom of Expression under the European Convention on Human Rights*. (Council of Europe, 2017), <https://rm.coe.int/handbook-freedom-of-expression-eng/1680732814>; ‘EU Human Rights Guidelines on Freedom of Expression Online and Offline.’ (2014), http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/EN/foraff/142549.pdf.

⁶ ‘REPORT on Media Pluralism and Media Freedom in the European Union.’, Pub. L. No. 2017/2209(INI), 2014–2019 39 (2018), <http://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&reference=A8-2018-0144&language=EN>. ‘Media Pluralism and Democracy: Outcomes of the 2016 Annual Colloquium on Fundamental Rights’ (European Commission, 18 November 2016), http://ec.europa.eu/information_society/newsroom/image/document/2016-50/2016-fundamental-colloquium-conclusions_40602.pdf.

⁷ ‘Flash Eurobarometer 464. Fake News and Disinformation Online.’, Survey results, Flash Eurobarometer (Brussels, Belgium: European Commission, April 2018).

⁸ ‘Proposal for a Regulation of the European Parliament and of the Council on Promoting Fairness and Transparency for Business Users of Online Intermediation Services.’, Pub. L. No. 2018/0112 (COD), COM(2018) 238 final (2018), <https://ec.europa.eu/digital-single-market/en/news/regulation-promoting-fairness-and-transparency-business-users-online-intermediation-services>; ‘Special Eurobarometer 452 Media Pluralism and Democracy.’, November 2016, http://ec.europa.eu/information_society/newsroom/image/document/2016-47/sp452-summary_en_19666.pdf. For an overview of the EC’s work in this regard, visit: <https://ec.europa.eu/digital-single-market/en/reports-and-studies/76009/75007>.

⁹ ‘Preserving Pluralism in a Rapidly Changing Media Market.’ (European Newspaper Publishers’ Association, October 2011), https://www.ofcom.org.uk/__data/assets/pdf_file/0024/62934/ns-annex-enpa.pdf.

¹⁰ Tim Dwyer and Fiona Martin, ‘Sharing News Online. Social Media News Analytics and Their Implications for Media Pluralism Policies.’, *Digital Journalism*, 5, no. 8 (18 July 2017): 1080–1100, <https://doi.org/10.1080/21670811.2017.1338527>; Helle Sjøvaag, ‘Media Diversity and the Global Superplayers: Operationalising Pluralism for a Digital Media Market.’, *Journal of Media Business Studies*, 13, no. 3 (26 October 2016): 170–86, <https://doi.org/10.1080/16522354.2016.1210435>; Valcke, ‘Looking For the User in Media Pluralism Regulation: Unraveling the Traditional Diversity Chain and Recent Trends of User Empowerment in European Media Regulation’.

¹¹ ‘European Parliament Resolution of 25 September 2008 on Concentration and Pluralism in the Media in the European Union.’, Pub. L. No. 2007/2253(INI) (2008); Peggy Valcke et al., ‘The European Media Pluralism Monitor: Bridging Law, Economics and Media Studies as a First Step towards Risk-Based Regulation in Media Markets.’, *Journal of Media Law*, 2, no. 1 (2010): 85–113, <https://doi.org/10.1080/17577632.2010.11427355>; Peggy Valcke, *Digitale Diversiteit. Convergentie van Media-, Telecommunicatie- En Mededingsrecht*. (Brussels, Belgium: Larcier, 2004).

¹² Philip M. Napoli and Kari Karppinen, ‘Translating Diversity to Internet Governance.’, *First Monday* 18, no. 12 (12 February 2013): 14, <https://doi.org/10.5210/fm.v18i12.4307>; K. Karppinen, *Rethinking Media Pluralism*, Donald McGannon Research Center’s Everett C. Parker Book Series (Fordham University Press, 2013), <https://books.google.be/books?id=vxaN3zUxhG0C>; Karin Deutsch Karlekar and Courtney Radsch, ‘Adapting Concepts of Media Freedom to a Changing Media Environment: Incorporating New Media and Citizen Journalism into the Freedom of

notion of media pluralism itself.¹³ Quoting BARZANTI: ‘the nature of the notion is intrinsically pluralistic and has extremely broad dimensions’.¹⁴ If it was extensive before, the online environment arguably made it even more so.

This paper follows the premise that ‘media pluralism is considered to be the overall democratic aim, whereas media diversity is how that aim is achieved’.¹⁵ This implies that wherever concrete measures and indicators are mentioned, this paper will use the term ‘diversity’. Conversely, wherever this paper discusses normative or political views, it will use the term ‘pluralism’. Please note that within media as a sector, the studies leading up to this paper have focused primarily on the diversity in the news. This choice assumes that, notwithstanding the important role of diversity in cultural, educational or entertainment media, obtaining diversity in news media has the largest impact on achieving the overall democratic aim of media pluralism.

b. Flemish policy and regulation

For Flanders specifically, online media pluralism as such has been less pronounced on the political agenda. In December 2017, the Flemish Government did however make an extra effort in terms of monitoring and transparency. During an event titled “Credible numbers for a strong democracy”, the Flemish government announced the launch of a new public network for statistics and information exchange, as decreed by Flemish Parliament in February 2016.¹⁶ The network’s primary aim is to provide annual statistics and numbers on the current state of affairs in Flanders on a number of topics in a coordinated, transparent manner. It may now have received stronger coordinating and strategic competences, but Statistiek Vlaanderen¹⁷ was already in charge of collecting and analysing public data and summarizing them into reports of its own accord. One of such reports is the annual “VRIND-study”, which bundles information on a range of topics, including media use, trends and perception from the “SCV-surveys”, as discussed more in-depth below. The launch of the network was lauded by both Eurostat¹⁸ and OESO¹⁹ for endorsing the international principles for public statistics.²⁰

As will be shown in the following section, the Flemish media regulator (henceforth: ‘VRM’) relies on this public data to monitor the Flemish media market and its dynamics, their duty as described in art.

the Press Index’, *Journal for Communication Studies*, ESSACHESS, 1, no. 5 (7 January 2012): 12; Valcke, ‘Looking For the User in Media Pluralism Regulation: Unraveling the Traditional Diversity Chain and Recent Trends of User Empowerment in European Media Regulation’.

¹³ Dietrich Westphal, ‘Media Pluralism and European Regulation’, *European Business Law Review* 13, no. 5 (2002): 487.

¹⁴ Fabrizio Barzanti, ‘Governing the European Audiovisual Space: What Modes of Governance Can Facilitate a European Approach to Media Pluralism?’, Robert Schuman Centre for Advanced Studies, EUI Working Papers, no. 49 (September 2012): 3.

¹⁵ See for example: Sjøvaag, ‘Media Diversity and the Global Superplayers: Operationalising Pluralism for a Digital Media Market.’

¹⁶ Geert Bourgeois, ‘Toespraak Door Vlaams Minister-President Geert BOURGEOIS’ (13 December 2017), <https://www.statistiekvlaanderen.be/sites/default/files/atoms/files/lancering-sv-geert-bourgeois.pdf>.

¹⁷ Flemish Statistics Authority, more information available at: <https://www.statistiekvlaanderen.be/>.

¹⁸ Emanuele Baldacci, ‘Official Statistics in the Digital Age: Challenges and Opportunities’ (13 December 2017).

¹⁹ Martine Durand, ‘Measuring What Matters to People.’ (13 December 2017).

²⁰ Bourgeois, ‘Toespraak Door Vlaams Minister-President Geert BOURGEOIS’.

169 §2, points 7 to 9²¹ of the VRM-decree.²² The VRM has two additional tools available to fulfil this duty: first, any media company recognised by the Flemish Community has the obligation to provide the VRM with any relevant information²³; second, the VRM may perform sample tests with specific market players for compliance with media regulation, including factors such as business models, risks, latest trends and changes in transmission behaviour, societal attention and previous transgressions by the market player into their analyses²⁴. These tools are used by the VRM to produce annual reports providing a comprehensive overview of the market, discussing relevant factors, and formulating a set of evidence-based policy recommendations for safeguarding media pluralism in general.

These Flemish “Media Concentration reports” will be analysed in-depth in the following section, followed by an overview of other relevant monitoring mechanisms in place, analysing the indicators they use in relation to the online environment.

2. State of the art: current monitoring practices in Flanders

This section of the paper provides an overview of the various monitoring mechanisms already in place in and for the Flemish community. The overview includes both a description of the mechanism, an analysis of the relevant indicators (as shown below in the right-most side of the table), summarized in a list of these indicators at the end of each monitor. The overview gives insights into how the existing monitors already cooperate, where they rely and learn from each other, but also where there are gaps and overlaps regarding the online environment specifically. These gaps and overlaps will then be discussed by the stakeholders in the third and final section of this paper.

²¹ Art. 169 §2, 7° het bepalen van de relevante markten en de geografische omvang ervan voor producten en diensten in de sector van de elektronische communicatienetwerken, en het analyseren van deze markten om te bepalen of ze daadwerkelijk concurrerend zijn; 8° het identificeren van ondernemingen met aanmerkelijke marktmacht op de krachtens punt 7° geanalyseerde markten, en het opleggen, indien nodig van een of meer van de verplichtingen, genoemd in artikel 125; 9° het in kaart brengen van concentraties in de Vlaamse mediasector.

²² ‘Decreet Houdende de Oprichting van Het Publiekrechtelijk Vormgegeven Extern Verzelfstandigd Agentschap Vlaamse Regulator Voor de Media En Houdende Wijziging van Sommige Bepalingen van de Decreten Betreffende de Radio-Omroep En de Televisie, Gecoördineerd Op 4 Maart 2005’, Pub. L. No. 2005—3718, C-2005/36611 (2005), <https://www.vlaamseregulatormedia.be/sites/default/files/vrm-decreet.pdf>. Henceforth: VRM-Decree

²³ Art. 176septies VRM-Decree.

²⁴ ‘Kaderbesluit Monitoring’, accessed 2 May 2019, https://www.vlaamseregulatormedia.be/sites/default/files/kaderbesluit_monitoring_0.pdf.

Table 1: Overview of existing monitoring mechanisms in Flanders and their characteristics

<i>Study</i>	<i>Year</i>	<i>Actor</i>	<i>Type</i>	<i>Scope</i>	<i>Aim</i>	<i>Access</i>	<i>Online Media</i>		<i>Online news</i>	
							<i>Diversity</i>	<i>Use</i>	<i>Diversity</i>	<i>Use</i>
<i>Rapport Media-concentratie</i>	2018	VRM	Govt	FL	Policy					
<i>Vlaamse Participatie Survey</i>	2014-2015	Statistiek Vlaanderen	Govt	FL	Policy					
<i>SCV-Survey (VRIND)</i>	2017	Statistiek Vlaanderen	Govt	FL	Policy					
<i>Digimeter</i>	2017-2018	MICT (imec)	Research	BE	Awareness					
<i>Internet-studie</i>	2018-2019	CIM	Private	BE	Commercial					
<i>GoPress</i>	/	Belga	Private	BE	Commercial					
<i>Colour codes</i>	Access		Publicly available	Conditional public access	Private or protected data	Indicators		Included	Not included	

a. Flemish Media Regulator: The Flemish Media Concentration Report

As mentioned, the VRM reports study the theme of media pluralism primarily from an economic point of view, protecting consumer choice and market dynamics. The focus is therefore on the number of media players operating on a given market, the position of those players on that market, across markets horizontally, and the relationships between players. The report nevertheless also has attention for other aspects of media pluralism. It includes informative side-notes on new media developments (eg. ‘vlogging’, paywalls or privacy issues), on new initiatives safeguarding media pluralism in Flanders and abroad, and it includes a range of policy recommendations for media pluralism in general. Finally, the report demonstrates an open approach towards the integration of results from other studies from indicators outside the traditional, economic market concentration parameters.

i. Online media diversity indicators

Since 2015, the report includes a range of indicators on the online environment that complement their traditional data on media concentrations in Flanders (eg. revenue streams, products and offers, mergers and acquisitions, board member mandates and structures, ...). Indicators that are now extended onto the online environment include those measuring market shares, subscription revenue, advertising revenue, viewer rate, user base and so on.

Additionally, the report includes a separate section titled ‘Internet’, with similar indicators as above to provide market information on network distributors, ISPs, intermediaries, social media, apps, web administrators and content creators. In terms of concentrations across media formats, the report provides that having an online or digital presence cause many media companies to easily be categorized as “cross-medial”, showing a great increase of cross-mediality in the sector.

Overall, the report suggests that convergence and cross-mediality are becoming the new norm in the Flemish media landscape. Interestingly, there seems to be a focus on brands throughout this convergence, meaning that the same brands are used across media formats (tv, radio, apps, ...).²⁵ This strategy would allow for easy recognition by consumers. It would thus be interesting to monitor the diversity of brands media companies use, as it may indicate how diverse the consumer perceives the various players. This would be interesting to monitor as one media company may have different brands across media formats, but consumers may perceive them as different companies.

The report also states that with the newly adopted Audiovisual Media Services Directive, the Flemish community media decree will have to be amended. This amendment would allow the VRM to provide similar overview and statistics on online video-sharing platforms with an audience in Flanders. Such numbers can thus be expected to be added to the ‘Internet’ section in the near future. Finally, the report concludes that while providing an overview of existing websites and apps is interesting, these markets are incredibly dynamic and fluctuant. The many changes in content and strategy throughout the timespan of a year are thus difficult to capture.

ii. Online media use diversity

The study shows a heavy reliance on other studies from private players discussed below.

iii. Online news diversity

Regarding online news specifically, the results are presented within the section on press and newspapers. The study reports how many of the printed press outlets have digital editions, online websites, apps and

²⁵ Vlaamse Regulator voor de Media, ‘Mediaconcentratie in Vlaanderen. Rapport 2018’, Brussel, 2018, available at: <https://www.vlaamseregulatormedia.be/nl/over-vrm/rapporten/2018/rapport-mediaconcentratie>. fig. 45, p. 94.

what their respective market shares are. This presents the diversity of news outlets, with market overviews of the online news market, the offline news market, and the news market as a whole.

Additionally, the report contains indicators of how accessible these online versions are and what their primary revenue model is. For example, it reports that most news websites work with subscription models or paywalls, meaning that a portion of the content is only available to those that pay a subscription fee. The report suggests that this subscription model appears to be the primary business model, meaning advertising based or pay-per-article models are the exception to the rule.²⁶ It also highlights that along with this new focus, news outlets pay greater attention and energy into this paid content.

This tendency to focus on subscriptions makes sense in light of other results from the study. On the one hand there is a large concentration on the Flemish media market, so that, for example in the case of Roularta Media Group's *abonnementen.be*, one subscription could provide access to 1/3rd of the available news sources in Flanders.

In terms of apps, the report investigated the common business model applied by apps. For Flanders most news apps still provide free articles, some based on personalisation, but also have a paid equivalent for a newspaper's digital edition. The report also analyses how popular each app is in terms of downloads, but not in terms of the frequency or type of use.²⁷

Additionally, the report indicates how many press agencies use mail or push notifications to reach their audience. Other reports complement this by indicating how popular or well received such applications are with the user, more on this below. The report indicates that the internal organisation of a media company with multiple brands could apply the strategy to distribute the same content across the different media formats and/or brands. This could be an interesting indicator to monitor, if possible to investigate.

Furthermore, when monitoring online diversity, website administrators may also have an important role to play. The report monitors the affiliations and roles of these administrators and found a relative degree of concentration, with website administrators sometimes managing several titles or brands simultaneously. However, the report states that this alone should not suffice to conclude a negative impact, as website owners are still diverse.

Finally, the report mentions the role of social media to access the news, but it does not provide recent numbers of its own. Where relevant, it integrates results from other reports discussed below.

iv. Online news use diversity

Interestingly, this report relies heavily on the results provided by other measurement systems discussed in this deliverable. For example, it uses the results from VRIND2018²⁸ to report on the medium most often used to obtain news (*in casu* radio) and comparing them over the years. Another example is the Digimeter 2017, which analyses, among other things, through which distribution channel citizens prefer their news (eg. for radio: through car radio, computer, smartphone, DAB, ...). These indicators will be discussed in their respective studies below.

When it comes to analysing viewer ratings in the online environment, the report notes that it struggles to assess this adequately. This difficulty was pointed out to them by CIM, on whom they rely for most of their data on viewer ratings. CIM is therefore developing new partnerships and new studies to remedy this situation, more on this below.

²⁶ Ibid. p. 72.

²⁷ Ibid. fig. 87, p. 217.

²⁸ The results or data of this report are not yet publicly available otherwise; the VRIND study analysed below is the 2017 study.

v. Overview

Online media diversity	Online media use	Online news diversity	Online news use
<p>Ownership concentration of digital media products (radio, TV and press).</p> <p>Market concentrations within the categories of the different digital products.</p> <p>Market concentrations for:</p> <ul style="list-style-type: none"> - distributors, - ISPs, - intermediaries, - social media, - web administrators - online advertising agencies 	NA	<ul style="list-style-type: none"> - Number of traditional printed press players having digital equivalents (apps, websites or digital editions). - Number of online exclusive news outlets. - Market shares of digital press. - Accessibility of digital press within each category (free, pay-with-advertising, pay-per-article, subscriptions with or without additional free content). 	NA

b. Other monitoring mechanisms in Flanders

Vlaamse Participatie survey 2014-2015

On behalf of the Flemish government, the ‘Steunpunten voor beleidsrelevant onderzoek Cultuur, Jeugd, Sport en Media’ carried out a large-scale survey in 2014 on citizen participation in Flanders. The interdisciplinary research constituted contributions from sociologists, economists, sports scientists, pedagogues, criminologists and communication scientists, etc. Flemish policymakers were also closely involved in the process, both from governmental and sectoral institutions, to ensure policy coordination. In 2016, the center received additional funds to continue its work for 2016-2020, during which a new survey will take place, to be expected in the coming year(s).²⁹ In this new study, media- and digital participation became a distinct discipline within the research. The current survey divided the relevant indicators across either ‘ICT’ or ‘Social participation’ sections. This data is freely available³⁰ and raw data can be requested. The primary methodology used is a survey, taken by est. 4000 people. Additionally, it is possible to refine the results based on a number of categories, eg. profession, education, cultural background, age, etc. to compare results. The consistency of the survey enables comparisons and trend analyses across the years. However, this was not possible for the topic of Internet and news, as those questions were introduced later.

i. Online media diversity indicators

Not applicable to this study.

²⁹ For more information on this, please visit: <http://cultuurenmedia.be/>

³⁰ The data can be accessed here: <http://rwebtool.ugent.be/pas2014>

ii. Online media use diversity

The survey contains a separate section for ICT-related questions: computer use, device use, internet use and news use. Questions in the first three categories revolve around which media formats the user has available in the household and which they use themselves.

In a first step to each category the survey checks with the users how frequently they use the Internet. In a second step, the survey checks with the users that indicated they rarely or don't use the Internet what their possible obstacles are for doing so. The category of 'Internet use' mainly checks the use of social media by respondents, specifically Facebook, Twitter and LinkedIn.

iii. Online news diversity

Not applicable to this study.

iv. Online news use diversity

In the section specifically regarding news use, the survey checks through which channels users prefer their news and what the frequency of that is. In the following step, the survey asks those that indicated they rarely or do not use the Internet to obtain their news, what the possible obstacles for them are.

A first relevant indicator is what amount of the respondents uses the Internet to follow current affairs news (Dutch: '*actualiteiten*'). The following indicators are divided in two categories: (1) online media literacy and (2) consulting news sources.

In the first category the survey asks how apt respondents are at looking up information for a diverse range of topics (from public transport to the weather). This is arguably an odd integration with the online news category. Other studies below suggest different indicators regarding online news literacy. Within this category however, rather than asking how apt an individual is at using social media, the indicator asks how apt they are at managing the privacy settings of a social media network.

In the second category, the section poses the question through which media format the respondents consult their news (TV, radio, printed press, social media, apps, etc.). In terms of online news use, the following indicators are especially relevant: computer, smartphone, news apps, social media, comment section, forums.

- Computer
- Smartphone or tablet: this indicator would be interesting to combine with the results from the following categories.
- News apps: News apps in this case refers to news aggregating apps, with personalised news feeds based on preferences (Flipboard, Zite, Feedly, ...).
- Social media: Obtaining news through the use of social media.³¹
- Comment section: Reading the comment section below an article.
- Fora: this category refers to commenting yourself on public fora *or* on news sites.

In a final, additional section, the survey indicates the interest of respondents in news.

³¹ An additional indicator could be whether this content comes naturally from the news feed algorithm (from friends, family or sponsored content) or is directly interacted with from liked pages of official news agencies.

v. Overview

Online media diversity	Online media use	Online news diversity	Online news use
	Social Media use (never – frequent)		Use of news sources (never – frequent)
	- Facebook		- Computer
	- Twitter		- Smartphone
	- LinkedIn		- Comments
NA	Social Media obstacles	NA	- Social media
	Interest (limited – high)		- News aggregator apps
			- Fora
			Interest in news (limited – high)

SCV-Survey 2017 (VRIND 2017)

The SCV-survey 'Sociaal-culturele verschuivingen in Vlaanderen' is an annual survey done by Statistiek Vlaanderen, a network agency of the Flemish government.³² The survey is done on a random sample of Dutch-speaking Belgians (including non-Belgian inhabitants since 2009) in the Flemish Region and the Brussels-Capital Region. The survey assesses values, opinions and convictions of Flemish people regarding social and policy-relevant themes. This survey includes a separate section on '*nieuwsgaring en –beoordeling*', roughly translated to 'news sources and critical reflection on news'.

Each year, approximately 1,500 respondents between the ages of 18 and 85 (18+ from 2009) are personally interviewed in the period March-June. The interview consists of three parts: background questions, questions that are asked every 2 to 3 years and a part that is reserved for questions about a current policy-relevant theme. Online news, diversity of media consumption and digitization in general have recurred as such a theme.

The survey data form a raw resource for policymaking and scientific research. All publications can be found and collected via the 'publications' section on their website. Time sequences and subdivisions can be requested according to background characteristics for several indicators from the SCV survey.³³ Depending on the indicator, data is available from 1996. The data from both the SCV survey, the ISSP research and the integrated SCV database 1996-2017 are available free of charge for scientific and policy-oriented research. Interestingly, the website of Statistiek Vlaanderen presents an overview of the most important indicators used within each category. The category 'Media' is the only one left blank in this regard.³⁴

Results of the survey appear in the annual edition of VRIND (Flemish Regional Indicators), which provides accessible summaries and overviews of the raw results, combined with results from other studies, such as the VRM concentration report discussed previously. This section therefore discusses the SCV-results through consultation of the VRIND 2017 report. Other sources of data for the VRIND 2017 results will be discussed in their respective sections (eg. VRM & Digimeter).

³² For the report, see here: <https://www.statistiekvlaanderen.be/vrind-2017>; For more information about the survey, please visit: <https://www.statistiekvlaanderen.be/sv-over-ons>

³³ For more information about this, please visit: <http://statistieken.vlaanderen.be/QvAJAXZfc/notoolbar.htm?document=SVR%2FSVR-SCV-02.qvw&host=QVS%40cww100154&anonymous=true>

³⁴ See here: <https://www.statistiekvlaanderen.be/statistiek-overzicht-kernindicatoren-per-thema>

The VRIND study uses 7 distinct categories in terms of media specifically:

- Media ownership (by citizens)
- Media use
- Certified radio stations (source: VRM)
- Television channels (source: VRM)
- Trust in media
- News use profiles
- Use of media applications

i. Online media diversity indicators

For indicators regarding the various formats, players and sources that are available to citizens, this study relies heavily on other studies for these sections: VRM Concentratierapport, CIM-studie and from the VRT-Studiedienst. Their indicators will be discussed in their respective studies.

The study does however include an indicator on ownership of different media *by* Flemish citizens themselves. Additionally, the data is used to highlight preferences and trends both for the Flemish population in general and per category (eg. education, age, digital literacy skills, gender). This structure is the same for the indicators in the following sections.

This indicator on ownership of different media *by* Flemish citizens³⁵ is followed by a distinction between citizens that exclusively own digital media, own a selection of media formats, or exclusively own traditional media (radio, television and/or a daily newspaper).

After these indicators, the study distinguishes the numbers according to certain categories, in which education³⁶, media literacy, gender and age play a central role. The same structure goes for the indicators in the following sections.

ii. Online media use diversity

For this category, the study goes beyond ownership and analyses the actual use of the media. Combining ownership numbers with use numbers, for example, the main highlight from these results is that not only does 1 in 2 only have digital media, 4 out of 10 people also exclusively use digital media. The results can then again be refined by the above categories: education, media literacy, gender and age.

iii. Online news diversity

This study relies heavily on other studies for this category. Indicators originating from VRM Concentratierapport and the CIM-studies are discussed elsewhere in this deliverable.

The VRIND study also draws from data on content diversity of Flemish public broadcaster, originating both from the VRT-Studiedienst³⁷, regarding actor diversity on sample TV channels, and

³⁵ Please note that digital media may also refer to ownership of a SmartTV, a regular television with a Set-Top-Box, VOD-service or other digital format enabling access to content through use the internet via a television screen; these numbers then do not contradict the numbers that 94% of the Flemish population has a television screen at home. The numbers of the Digimeter make a much clearer distinction in this regard.

³⁶ This indicator could be complemented by those from the Participatiesurvey, which has indicators on what the possible obstacles could be preventing ownership or use of digital media, despite the apparent interest in them.

³⁷ Which is the research department of the Flemish public broadcaster, more information at: <https://www.vrt.be/nl/over-de-vrt/prestaties/onderzoeksresultaten/>.

from ‘Elektronisch Nieuwsarchief’³⁸, regarding diversity in news content on TV and in printed press. The data of the VRT and ENA are only available under strict conditions however. As this data does not account for online news content, they will be looked at in a further stage of research to develop online news content indicators by analogy.

iv. Online news use diversity

The study has a separate section on what they call the ‘news use profile’.³⁹ This section deals specifically with how citizens consumer their news, through which channels, how frequently and how reliable or trustworthy they find news through those channels, all again subdivided in the categories of education, media literacy, gender and age.

v. Overview

Online media diversity	Online media use	Online news diversity	Online news use
NA	<p>The following indicators are measured in general and per category of education, age, digital literacy skills and gender.</p> <p>Ownership of media:</p> <ul style="list-style-type: none"> - Digital only - Digital + newspaper - Digital + traditional - Traditional only <p>Use of digital media:</p> <ul style="list-style-type: none"> - Digital only - Digital + newspaper - Digital + traditional - Traditional only 	NA	<p>The following indicators are measured in general and per category of education, age, digital literacy skills and gender.</p> <p>Channels used to obtain news specifically:</p> <ul style="list-style-type: none"> - Digital only - Digital + newspaper - Digital + traditional - Traditional only <p>Frequency of obtaining news through the internet:</p> <ul style="list-style-type: none"> - Digital only - Digital + newspaper - Digital + traditional - Traditional only <p>Perception of online news in terms of:</p> <ul style="list-style-type: none"> - Reliability of information - Quality of news coverage - Quality of reporting

Digimeter 2017-2018

With the digimeter project⁴⁰, imec.livinglabs aims to gather and share data and information about media and ICT usage in Flanders, and to do so systematically, using a representative methodology. The primary research aim is to provide researchers with data and insights regarding the adoption and diffusion of (new) media and ICT, as well as the latest trends, habits and practices. Because of its annual frequency, digimeter also serves as a monitor to detect and keep track of emerging trends and practices.

³⁸ Which is a non-profit archive providing access to VRT content, primarily intended for research: <https://www.nieuwsarchief.be/>.

³⁹ For more information on the profiles: <https://www.statistiekvlaanderen.be/nieuwsgebruikprofiel>

⁴⁰ More information available at: <https://www.imec-int.com/nl/digimeter>.

The second research aim relates to digimeter's detailed profiles: by carrying out the survey on a yearly basis and by including recurring respondents as well as a substantial amount of new people with each wave, the project builds and refreshes a database containing detailed user profiles of end users who agreed to be involved in further innovation and user research. This user database is available to SMEs, organizations and larger companies, for research in collaboration with imec.livinglabs. Management of the digimeter user panel is handled by the user involvement staff of imec.livinglabs.

The information provided by the Digimeter is extensive and comprehensive and almost entirely relevant to the scope of this study. Providing a summary of the results would therefore be too extensive for the purpose of this study. The following sections will thus be limited to an analysis of the indicators applied and some of the most interesting or relevant results.

The table of content for the Digimeter contains 8 distinct chapters, which for the purpose of this study are divided into 3 categories: traditional media (TV & Video; Radio & Music), internet and news (News consumption; Social Media) and other uses (Messaging & Communication; Gaming; General Media). Only the second category will be discussed in the following sections.

i. Online media diversity

Similar to the SCV-study (VRIND), the Digimeter surveys the numbers of which media formats citizens use, albeit in more detail and more distinctions between categories. For reasons of efficiency, these indicators will not be discussed here, as they are not all relevant to the online environment.

The first important indicator studies which social media platforms are the most popular among the Flemish population. It does this first by measuring account ownership⁴¹, second, in the following section, by measuring how they use the network.⁴² This for the following social media platforms:

- Facebook
- Instagram
- YouTube (Google+ account)
- Twitter
- Combination of the above

ii. Online media use diversity

In terms of online media use, the study analyses both the monthly use of a network in general (1), and the frequency with which a specific platform is used by an individual (2), applying age variables to the data. Additionally, the study also lays out an evolution of growth of a platform, finding for example that Facebook is only growing among Flemings aged 30+, while the user base of Instagram is growing across all age groups.

Interestingly, the study also includes indicators on which activities Facebook is used for by its users such as liking or reacting to posts, sharing content and posting status updates, as well as through which channel: private message, private wall (according to privacy settings) or entirely public.

This final indicator provides the perfect transition to the indicators regarding the content shared by Flemish users. Without going into the results of these indicators, it can be briefly mentioned that it focuses on GIFs on the one hand, and live video on the other hand. Both are types of content that may

⁴¹ This includes whether a participant at one point had an account, decided to delete it and how recent that was. The combination of these indicators gives the insight that, for example, a large majority of Flemings who have deleted accounts on (at least) one social network still frequently use other social networks, and that less than a quarter of frequent social media users have never deleted an account.

⁴² Digimeter p.138.

be shared over a social media network or online messaging services. The study analyses three things in regard to these formats: awareness and popularity of the formats, sharing them and creating it themselves.

iii. Online news diversity

Not applicable to this study.

iv. Online news use diversity

The chapters in the study on news consumption make a distinction between the carriers and devices used to follow the news on the one hand (1) and the sources of news citizens consume on those carriers (2).

⁴³ Please note that similarly to previous indicators, all indicators are tracked per age group.

Almost 3 in 4 Flemings claim to have used a digital device to consult news, of which 86,6% visits a news website at least once per month. Only this percentage of people was considered relevant to study the first set of online news use indicators set out below (referred to as a ‘digital news consumer’: having visited a news website at least once per month). The study then tracks whether that use happened through a computer, a smartphone or a tablet. Additionally, these results are linked with the previous indicator tracking how much importance an age group attaches to following the news. This way it can conclude, for example, that there is a shift from exclusively using traditional news media towards combinations of traditional news media and online and/or mobile news carriers.

In the second part, the study analyses which type of news sources the Flemish population consumes, per carrier or device (computer, tablet or smartphone), providing the multi-layered indicator ‘‘Do you consume any of the following news sources (1) and if so, how often (2) and through which carrier or device (3)?’’

- Digital, downloadable version of a newspaper
- Social media as a news source; albeit with the additional indicator whether the participant perceives social media as a news source altogether.
- Search engines (e.g. Google, Bing) in terms of active searches by citizens looking for specific news items.
- Personalized news apps

The study, interestingly, also includes a set of indicators on the opinion of Flemish citizens concerning news consumption. First, the importance the participant attaches to following the news, tracked across age groups. Combining this with previous indicators, the study was able to draw the conclusion that ‘‘a substantial portion of the youngest generation merely considers following the news a ‘by-product’ of their general (social) media consumption, pointing to a more passive approach to following the news’’. This is an interesting indicator to follow-up on or to be complemented by more technical indicators from the social sciences. Second, this section also includes an indicator of what the Flemish population considers to be news, for example whether gossip about the private lives of celebrities could be qualified as news.

Also relevant in terms of opinions, is the indicator that assesses how the Flemish population feels about news coverage by Flemish news media, referring to their level of satisfaction.

Finally, the study includes an indicator about the interest in receiving personalised news. Tracked across age groups this shows that, for example, the need for personalized news based on their interests drops significantly in the youngest age segments, with an opposite evolution in the oldest age groups.

⁴³ Digimeter p.122

v. Overview

Online media diversity	Online media use	Online news diversity	Online news use
<p>Indicators in this study are measured in general and per age group, and for the following social media networks:</p> <ul style="list-style-type: none"> - Facebook - Instagram - YouTube (Google+) - Twitter - Combination of the above <p>‘Do you have an account with the following social media?’</p> <p>‘Ever had an account on the listed social media?’</p> <ul style="list-style-type: none"> - At least 1 social media account deleted - At least 1 social media account deleted – split by having no other active social media anymore - versus switched to another (set of) social media - Social media account deleted in relation to having at least 4 active social media accounts 	<p>‘Which of the listed social media platforms have you used during the past month?’</p> <p style="padding-left: 20px;">➔ Facebook; Instagram; YouTube (Google+); Twitter; Combination</p> <p>‘How often do you use this social network?’</p> <p>IF using Facebook 1h/day: ‘How often do you engage in following activities on Facebook?’</p> <ul style="list-style-type: none"> - Liking someone else's post - Posting a reaction to someone else's post - Sharing someone else's post - Posting a status update - Posting content in a private Facebook group - Publicly posting photos/videos - Sharing a link to a news article - Indicating whether you'll attend an event or not - Announcing an event - Adapting my privacy settings - Defriending someone <p>IF using Instagram 1h/day ‘How often do you engage in following activities on Instagram?’</p> <ul style="list-style-type: none"> - Liking someone else’s photo - Reacting to someone else’s photo - Posting a photo - Sending a photo message - Sharing content - Posting a video via Instagram stories <p>‘To what extent do you agree with the following statements?’ (5-point scale)</p> <ul style="list-style-type: none"> - I am worried that social media violate my privacy - You miss a lot of updates and event announcements without a Facebook account - I am spending too much time on social media - I can't spend a day without social media - I am sharing more now on social media than before - Messages on social media about TV programs can trigger me to watch that program - I always consciously reflect on what to share on social media with who 	<p>NA</p>	<p>‘How frequently do you use the following carriers/devices to follow the news?’ (split by sole news vs in combination with other carriers)</p> <ul style="list-style-type: none"> - Consumption of traditional news carriers on a daily basis - Consumption of mobile news carriers on a daily basis <p>‘Which devices did you use to follow digital news sources during the past month?’</p> <ul style="list-style-type: none"> - news websites - downloadable digital newspaper - social media - search engine - personalised news app <p>‘Which devices did you use to follow digital news sources during the past month?’</p> <ul style="list-style-type: none"> - Computer - Smartphone - Tablet - Any device <p>‘To what extent do you agree with the following statements?’ (on a 5-point scale)</p> <ul style="list-style-type: none"> - I think it's important to follow the news - I consider gossip about the private lives of celebrities as news - I am satisfied with the content on Flemish news media - I only want to follow news on topics I am interested in

CIM Internet Studie 2018-2019

The Center for Information on the Media (CIM) collects numbers on readership and media distribution, primarily with the aim of optimizing advertising spending and commercial considerations. CIM was created in 1971 from the merger of the DVEA (the first organism to authenticate the distribution of Belgian press titles) and the BSRM (the first Belgian institute to measure reach). Since 1971, CIM has been collecting data about the reach of various media formats: television, radio, out-of-home, internet, cinema and the press.⁴⁴

Since June 2014, the CIM Internet study has been delegated to Gemius, a Polish institute specialised in online metrics. The study consists of two parts: traffic and reach. While there is no comprehensive study of this other than the integration into others (see supra), the institute does, at least partially, publish their data, allowing to derive some of the indicators applied.

The internet study has been in development since 2014 and counts new indicators and variables every year. The website provides an overview of what the study has come to include:

- Range across devices: PC, Smartphone and Tablet
- Streaming. The measurement of online video and audio with traffic and reach results.
- Category of 12 to 17-year olds. The study has expanded from 18+ to 12+ since 2016
- Home-work deduplication. Possibility to merge data from surfing habits at home and at work.

New since the latest results:

- Websites of non-subscribers. Currently only traffic and coverage of the subscribers (primarily media companies) of the CIM Internet study is measured.
- Reach data of mobile apps

There is also a CIM Netpanel under construction, a software panel that measures all traffic on PC via a virtual meter, including from foreign and non-commercialized sites. CIM also wants to build a software panel on mobile devices (smartphones and tablets under Android and iOS). These panels would eventually be merged with the basic study.

In addition, Gemius provides a website with technical data about the internet in Belgium: which browser is most popular, which device is the most surfed and evolutions in the use of operating systems, etc.

i. Online media diversity

The CIM Internet study does not track the diversity of online media as such. It does track how often the various media are used, requiring an overview of the different media available in Belgium in the first place. The overviews they use for this do not make a distinction between the various language communities in Belgium however, nor does it track the user data for other than those companies subscribed to them, which will soon change as mentioned above.

ii. Online media use diversity

First and foremost, the institute focuses on the indicator of ‘page views’, defined as “an event of displaying a webpage in a web browser or application. A page view is counted when the tracking script is executed in the source code of a webpage.” The study then adds a number of variables⁴⁵:

⁴⁴ For more information about the specific methodology used, please visit: http://www.cim.be/sites/default/files/Media/Pers/Documents/cim_pers_methodologie_2016-2017_nl_1.pdf.

⁴⁵ More information about these variables can be found on: <http://ranking.gemius.com/be/faq/>

- Browser ID,
- Operating system,
- Devices: PC, tablet, phone,
- Web browser,
- Stream views.

However, the VRM report commented that CIM had reported to them⁴⁶ that they find it difficult to get a good overview of traffic and reach on the internet as apparently there is no consensus on methodology and variables to account for, as well as the need for the monitoring party to be sufficiently neutral and objective. CIM now speaks of implementing a “total video currency”, meaning a study that can account for all types of audiovisual content (broadcaster content and advertising), on all devices, in all time windows (live, review, preview) and in all formats (livestream, short form, longform), by fusing results of various hybrid measurements.⁴⁷ It has yet to be fully developed for 2019 onwards, although a limited range of data is currently freely available through their metric platform.⁴⁸

iii. Online news diversity

No specific indicators in relation to news.

iv. Online news use diversity

No specific indicators in relation to news.

v. Overview

Online media diversity	Online media use	Online news diversity	Online news use
NA	Page views and stream views, for subscribed parties, with the following variables: <ul style="list-style-type: none"> - Browser ID - Operating system. - Operating system: types - Operating system: families - Devices: PC, tablet, phone - Web browser - Web browser: types - Web browser: groups. Untested indicators: <ul style="list-style-type: none"> - Reach of websites of non-subscribers - Reach data of mobile apps 	NA	NA

⁴⁶ VRM Concentratierapport 2018, p. 278

⁴⁷ Jaarverslag CIM 2017, p.50, 2018.

⁴⁸ <https://rating.gemius.com/be/overview>; this overview does not make a distinction between the different language communities in Belgium however, so that no preliminary results can be derived for the purpose of this deliverable.

GoPress (Belga)

GoPress is an online press database and media platform delivering companies high-quality press monitoring services, acquired by Belga⁴⁹ in 2016, but directed under the name of Mediargus. All traditional Flemish newspaper publishers are shareholders. Mediargus provides solutions for media professionals in the field of press monitoring, publication of press reviews, document management and media networking. Although the content of these studies has greatly contributed to other studies discussed in this deliverable, the results nor the data are freely available for use, thus leaving the indicators used unclear. Indicators may only be derived from the previous analyses of studies that have used their data.

3. Stakeholder thoughts and concerns

Considering the complex nature of the online environment, close cooperation and interaction with various stakeholders based on a minimal consensus and understanding of the issues at hand are essential to developing relevant indicators. Therefore, the use of empirical studies with various stakeholders is considered of great added value to an evaluation of existing monitors. More concretely, the empirical studies done in the framework of DIAMOND SBO first identified the relevant issues from policy and regulation, to then bring these up for discussion with a group of stakeholders. In order to get the most in-depth and variety of responses, the empirical work was divided into a survey, a roundtable debate and a co-creation workshop, each format having their own strengths and weaknesses. This section summarizes the results of all three workshops, finally listing the (more or less) concrete indicators as put forward by the stakeholders. Analysing the responses, the suggested indicators could be argued to fit into three relatively distinct categories: online news personalisation, policy and regulation, and finally inclusivity and representation.

a. General remarks on monitoring

A first general remark from stakeholders on monitoring media pluralism online was repeated several times during the studies: indicators should always be careful in correctly distinguishing roles and functions of different actors at play. They say this mostly in the context of developing new indicators for the online environment, as these involve a range of players that are still evolving and that are very dynamic. While it is necessary to be aware of the difficulty in defining these players, monitoring them is still considered to be wise considering their already great impact on the media sector. For example, online content platforms cannot be regulated the same as offline content platforms, nor should they be weighed equally in a risk evaluation. Participants therefore urge to take great care in formulating these indicators, signalling a preference for functional definitions, i.e. focusing on a specific risk measured by a specific indicator, rather than an overarching definition applied to a monitoring mechanism as a whole.

In line with the previous remark and above results, participants find that any studies or research done on consumption and exposure diversity in the online environment is essentially taking their first steps. Participants therefore urge forward-thinking indicators to guide research on consumption and exposure diversity towards measuring information of actual relevance and use for policy and regulation, instead of relying on the limited early data available to draw conclusions from for risk evaluations and impact assessments.

Participants also urge to stay consistent in the intention of an indicator, describing a factor as a fact or as a problem to media pluralism, as each requires a different type of answer or perspective. This comment was specifically made while discussing the indicators on market concentration but was

⁴⁹ This is important, as according to numbers provided by the VRM Concentratierapport (supra section 2.1), Belga has a key, central position in the Flemish media market as a national news agency. For more information on Belga, please read the VRM Concentratierapport, p.62, *ibid.*

requested to be kept in mind throughout the process of drafting new indicators. One concrete example distinguished between indicators requesting objective market numbers and those requesting an impression of the sustainability of the market. While the former indicator could show a diverse set of players on the national market as a positive indication, not showing the risk of a foreign, international player easily taking over the majority of that market; the latter indicator could show a situation where one or two national players are doing exceptionally well, providing sustainable competition with foreign, international players. Another concrete example concerns content moderation and filters. Is the risk to media pluralism higher or lower when there is active content moderation and filtering? The reasoning being that content moderation may also successfully moderate hate speech, fraudulent disinformation and harmful content. Participants thus urge to stay conscientious when assessing the risk presented by numbers and vice versa, when assigning objectivity to a risk assessment, which essentially presents a conscious policy choice.

b. Key focus points put forward by stakeholders

1. Online news personalisation

Participants were highly interested in the topic of online news personalisation due to the relevance of their expertise and personal interest. Interestingly, they instinctively made a distinction between indicators that play at the level of academic research and those that play at a corporate or business policy level. Their comments can be structured according to the top three priorities of monitoring, as identified by the previous empirical study revolved around three factors:

- Whether news users receive information about how personalized their online news consumption is.

This factor is situated at the level of the user and their relationship with the news provider. Participants added this indicator to the category of measurements at a policy level. Specifically, participants noted the necessity to measure the level of transparency provided about the personalization applied by the controller of the algorithm. Transparency measurements could thus include an analysis of the public *ex-ante* information provided to the user of a personalized recommender system, complemented by an analysis of the *ex-post* information provided on individual user requests about the level of personalization applied to them specifically.

It can be added here that the survey indicated that consistently monitoring this factor would benefit online media pluralism the most. It would therefore be highly interesting to develop an indicator for *ex-ante* public information, ideally complemented by *ex-post* individual information to users about the level of personalization influencing the news recommendations they receive.

As a side note, participants suggested that one future indicator for measuring the quality of the user-provider relationship in general could be based on the user's possibility to choose between recommender systems varying in degree of personalization and/or in degree of providing content in accordance with the principles of media pluralism (variety of viewpoints, actors, formats, topics, ...).

- Whether personalization ensures that news users mainly receive content that fits their field of interest.

This factor is situated at the level of the user and their relationship with the algorithm, which could serve as a complement to the previous indicators. The participants noted here that both policy and academic research may be able to provide information.

A first important factor participants suggest is to measure the effectiveness of personalization. By this is meant the accuracy of correctly predicting the user's preferences. This factor ties into the previous section, by monitoring whether a news recommender system achieves what it proclaims to do.

From academic research, the participants suggest studying the effects of profiling a news user on the content of the articles provided to them. In other words, to study the differentiation of an article according to profile. In terms of monitoring, it could therefore be interesting to provide indication how many players use this type of content-personalization.

A third factor, this time at a policy-level, is to study what the influence of the user is on the algorithm. This factor is affected by several of the previous factors: the level of transparency towards the user of the workings of an algorithm, the possible choice between algorithms or their degree of personalization and the effectivity rate of assessing a user's preferences, all of which may increase the level of technical understanding of the algorithm by the user. This specific factor then relates to what extent the user can influence the workings of the algorithm, be it actively (through conscious decisions) or passively (simply through using the system), alternatively whether the algorithm obtains its personal information from a third party, thus limiting or excluding the possibility to influence the algorithm by the user.

Specific indicators in this field would thus measure how deep personalization of the content goes (e.g. website, news recommendations, article content), how accurate this personalization is (e.g. effectivity of matching personal information/profiles with news content) and how much the user can influence the algorithm (e.g. indicating which personal data the algorithm works with: third party data, use data and analytics, user data provided to the service in general, ...).

- Whether online news provides more diversity in news consumption.

This factor is situated at the level of the news provider and their relationship with online specific dynamics. The participants noted here that there is an important task laid out for academic research to study the complexity of using algorithms to curate online news. The concrete suggestions in this field also tie into those from the previous sections, providing a coherent train of thought from the participants and potentially resulting in a practicable overall risk assessment as described below.

A first concrete suggestion for an indicator is to study exactly how the algorithm operates, not only evaluate the plural nature of the result of the operation. This ties into the previously suggested indicator on the operation's effectivity, analysing what personal information is considered, which information is neglected, which weight is given in the operation to specific types of information, but perhaps most importantly, how the operation matches given personal information with media content it is assigned to recommend. For example, how does the operation decide that any male aged between 20 and 30 from Belgium and subscribed to Sporza, would prefer soccer news over e-sports news? An analysis of how the operation works may be valuable to evaluate whether online news adds more diversity in a user's news consumption, instead of – for example - bringing more of the same.

A second suggestion for an indicator expressed the concern of the level of aggression in news providers' data harvesting practices. The participants would like there to be more transparency towards the public and to the regulators, not only on which type of personal information they use to provide personalized news recommendations, and how it is processed, but also on where they receive that data from. This indicator is a third step in the row of data harvesting indicators: transparency to the user, transparency on the operation, transparency on the source of the data. The importance here primarily lying with the need for the general public to know where news providers obtain their data.

A third, more straightforward indicator is to monitor the exact share of personalized media in the total offer. Concretely, this indicator would measure the total offer of an online news provider and subsequently obtain information on how much the website is enabled to adapt itself according to a specific user profile. This information could either come from academic research or could be voluntarily provided by the news provider themselves, as this would be much more efficient.

A final, summarizing indicator for the public at large could be to provide a comparative overview or ranking system between the different algorithms implemented by the relevant online news providers or other relevant market players, based on a set of clear criteria as monitored by the previously elaborated indicators: transparency, user control, data quality and operational logic. This final indicator could score

the results from all previous indicators mentioned regarding online news personalization in terms of risk of negatively affecting a plural news consumption.

2. Policy and regulation

The top three priorities of monitoring identified by the survey in terms of policy and regulation revolved around four factors, of which the following two factors were thoroughly discussed in the workshop:

- Level of subsidies for investigative journalism.

This first factor of policy and regulation corresponds to the most negatively scored statement within the survey, where participants responded that they felt investigative journalism does not receive sufficient subsidies. The identified elements at play situate this factor at multiple levels of policy and regulation, including both governmental and media industry policy. Participants had a clear focus on monetary and budgetary aspects of this factor, discussing amongst themselves about the different ways monitoring mechanisms could keep better track of where the subsidies go and how efficient it is spent. The co-creation workshop this topic was discussed on contained an example of a factor which purposefully steered away from more straightforward elements, suggesting an indicator on the share and quality of the attention given by editors to investigative journalism within their media offer. Participants quickly noted this to have minimum effect on the problem, instead discussing clear financial and budgetary elements.

A first, more straightforward indicator is to list the capacity of existing mechanisms for subsidies or grants in Flanders.

Second, following up on the previous indicator is a study of the necessity of subsidies, as participants noted that not all topics or types of investigation would equally benefit from financial support. They noted that investigative journalism also contains multiple layers of work, e.g. research, framing, editing, reporting, ... and that the most beneficial support mechanism varies across the process. Finally, once there is a clearer image of where subsidies are going and/or should go, participants noted that a crucial element in the problem is the need for quality follow-up of the expenditure policy, to make sure budgets are used efficiently, suggesting an indicator that assesses how many subsidies or grants contain follow-up provisions with quality and efficiency standards and how they are enforced in practice.

All three suggested indicators appear to boil down to the idea that an absence or lack of subsidies is only the start of what should be measured. Participants spent much more time developing indicators that focus on evaluating the content of the policies deciding how subsidies or grants are awarded and how they should be followed up on.

- Fairness of the rules for awarding grants to the media.

This factor refers specifically to the role of governmental policy. While the scope of this statement is not limited to investigative journalism, participants nevertheless felt it was important to focus on the needs of “vulnerable journalism” and quality journalism. Interestingly, the suggestions in this category were more varied and fine-grained than those related to subsidies, broadening the scope of relevant elements to e.g. transparency, policy choices and alternative support mechanisms.

More concretely, the participants pleaded for a high level of transparency in the decision-making process of distribution, with clear qualifying criteria and motivations; an evaluation whether these criteria benefit media pluralism, e.g. by prioritizing local journalism or topical journalism; and for an indicator on whether VAT-benefits are extended to (small) online players. Additionally, participants noted that any monitoring of this issue should have attention for unconventional ways of government support of media pluralism, e.g. by providing access to information, tools, promotional material or expertise.

- Safeguards for media independence

Based on the 9th most agreed with statement, whether legislation is considered necessary to ensure editorial independence for online media content, participants had several remarks they wanted recorded. Rather than discussing possible elements, participants asked four fundamental questions for any monitoring policy to ask itself when developing new indicators on media pluralism.

They start by pointing out that the dynamics of the online environment have definitely affected the degree of independence of media players online, but not so much through external pressures from third parties, but from internal pressures, from their own marketing and financial management. While this type of pressure has not changed from before, participants do claim it has intensified and may warrant extra care.

The first is on which level media independence is the most vital: financial, editorial or at the level of an individual journalist? The latter would imply that individual journalists should only write based their own interpretations, free of additional incentives. Participants did note however that journalists may also publish their own coloured opinions on news events, sparking the question whether a journalist's affiliation to an ideology may affect their articles or not.

The second remark relates directly the online dynamics, questioning whether media independence is still realistic considering the online business model, where there is an implied dependence on social media platforms and search engines to provide publishers with the necessary traffic. The participants then pose the question whether this type of dependence could not simply be allowed as any intervention in favour of independence may otherwise undercut the business model of online news providers. The last remark is the most practical remark, stating that despite the fundamental policy questions yet to be answered, the least a monitor could do is obtain transparency and clarity about cash flows and financing in the online environment. The reasoning being that if there is indeed a higher level of dependency in the online environment, that the level of transparency should at least equally increase alongside it.

3. Inclusivity and representation

The third category of important issues to monitor for online media pluralism sparked much debate. Whereas the identified priorities of the survey focused on the representation in the news of minorities and gender, the discussions in the workshop were divided across the value chain. The lotus flower exercise was divided into three concepts: community media (market diversity), diversity in the workforce (actor diversity) and finally representation of minorities in the media (content diversity). Framing the issue in this way follows the natural flow of the discussions as this expert group produced a wide range of affecting factors and corresponding indicators, showing the many layers of media pluralism.

- Community media

Comments on this category were limited as the most important comment is that more research is needed into media clusters in cities, as well as the dynamics of communities in an online environment. However, the participants suggested that such media would like to do more. Specifically, the participants in this group agreed that community media play an important role to provide corrections to mainstream news, thus serving as an important complementary source of input for citizen's news diet.

However, the participants promptly stated that there is far too little known about community media in the online environment, with specific interest to research media clusters within larger cities, e.g. the average news consumption of communities within Brussels or Ghent. To adequately monitor online community media, the participants thus conclude there is a lot of work to be done in finding ways to do so in a practicable way, especially when there is a myriad of online foreign community media that play an important role in the news diet for many communities.

- Workforce diversity

Interesting in this category was the diversity in the cited elements. The participants were interested in both the professional and social aspects that contribute to workforce diversity. Elements discussed of professional aspects were the level of job security, the application of positive discrimination in news production, and the possibility of career opportunities (e.g. diversity internships and promotions). With regard to social aspects, the main focus lay on the use and impact of role models, and the encouragement of interest in the classroom, such as with journalism workshops or assignments. It is interesting to note however, that many of the professional aspects are currently accounted for in existing monitoring mechanisms, while the social aspects are relatively new.

Finally, but perhaps most importantly, it was explicitly noted by participants that more research is necessary to study the relationship between diversity in the workplace and diversity in news output, before being able to correctly assess the impact on or benefit to media pluralism of these indicators.

- Minorities in the news

Participants emphasized two categories of elements relevant to this concept: practical elements (such as accessibility), and the manner of representation of minorities, identified as the second highest important factor to monitor. The central point of the latter category being that it is essential that minority individuals are represented because of their knowledge, expertise and personal characteristics, not only because they are members of a certain community. However, it has been suggested that more research will be needed on how certain communities deal with or view online news.

As for the practical elements, the participants suggest indicators on the popularity of accessibility tools among online news providers and of the implementation of readability and clear language practices and standards.

As for inclusivity elements, participants suggest indicators on which news providers use the expert database (containing a diverse range of experts with many backgrounds) rather than their own limited pool; and an indicator whether online metrics and analytics steer online news journalism to favour the majority in terms of topics, actors and representation. Participants in this group do also explicitly note the necessity of more research into the use and perception of online news by certain communities, as this may skew any online metrics.

The key takeaway of this category is thus two-fold: the online news environment has the potential to benefit media pluralism in a practical way, as an important enabler for news consumption (e.g. easy language translations and accessibility tools for the impaired), and in an inclusive way, as a processor of relatively detailed information on their audience constellation and consumption patterns, sparking the question whether online news providers should not do more for representative diversity than their offline counterparts.

4. Overview: missing indicators as suggested by stakeholders

This section provides an overview of all indicators suggested during these stakeholder interactions, including those not mentioned in the above summary and after filtering out those that are already monitored by the studies discussed in Section 2.b:

i. Online news personalisation

- Online news provider data practices, including online news feed algorithm use.
- Whether news users receive information about how personalized their online news consumption is: *ex-ante* and *ex-post*.
- Whether personalization ensures that news users mainly receive content that fits their field of interest.
- Whether online news provides more diversity in users' news consumption.
- Whether personalization ensures that news users consume more diverse content.

ii. Policy and regulation

- Gravity of the sanctions against journalists in defamation and libel cases – with increased weight in the risk evaluation compared to whether or not legislation has decriminalized defamation.
- Amount of press freedom cases that did not make it to the court of assize due to the high entry bar, instead being solved outside of the courthouse.
- Analysis of court cases against online platforms and/or public fora on their involvement in disseminating hate speech and xenophobic content.
- Transparency on the process of access to public information (e.g. Public guidelines and safeguards for competing interests at stake, statistics of requests, reasons and decisions).
- Existence of a centralized governmental unit or portal for information on and for access request proceedings.
- Existence of regulations on the disclosure of article source by news outlets on online social media platforms, limited to an indication whether the content is their original content.
- Transparency on the process of ISP interference of online content (e.g. Public guidelines and safeguards for competing interests at stake, statistics of requests, reasons and decisions).
- Existence and effective implementation of anti-SLAPP regulations.
- Fairness of the rules for awarding grants to the media.

iii. Inclusivity and representation

- Content diversity between news outlets, given more weight in the risk evaluation than the number of existing outlets.
- Interactions between editorial boards: e.g. close cooperation, content syndication,....
- Share, geographic source and use of online community media.
- Level of subsidies for investigative journalism.
- Threats and hate speech against journalists online.
- The diversity in online news reporting in terms of representation:
 - People from an ethnic minority group
 - People with a disadvantaged background
 - Persons with disabilities
 - Gender

4. Conclusion

The participants in the empirical studies generally agreed with the existing literature stating that traditional indicators are still relevant, but that new indicators are required for the specific dynamics of the online environment. Within each domain of key issues, both literature and stakeholders refer to the necessity of new research. According to the participants specifically, this research should come first, in order to better understand online dynamics and their potential impact on media pluralism. Only in a second step could then useful indicators be developed or could results of existing indicators be correctly weighed. However, the most pragmatic policy option appears to be that preliminary indicators may still provide policy debates with fresh material on what media pluralism means in the online environment. The DIAMOND SBO project therefore aims to implement a selection of these indicators onto online-only Flemish media players in practice, to be completed by the end of 2019. The results of this implementation may then allow policy to further fine-tune their monitoring mechanisms based on concrete evidence.

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- Elektronisch Nieuwsarchief: <https://www.nieuwsarchief.be/>

Author contacts:

Ingrid Lambrecht

PhD Researcher ICT and media law at KU Leuven

Centre for IT & IP Law

Sint-Michielsstraat 6 - box 3443

3000 Leuven

Belgium

Email: Ingrid.Lambrecht@kuleuven.be

Prof. dr. Peggy Valcke

Professor ICT and media law at KU Leuven

Centre for IT & IP Law

Sint-Michielsstraat 6 - box 3443

3000 Leuven

Belgium

Email: Peggy.Valcke@kuleuven.be