Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

Country report: Denmark

Vibeke Borberg, Independent expert - Attorney-at-Law, PhD
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Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States and Candidate Countries of the European Union, and considering both online and offline news environments. This narrative report has been produced within the framework of the implementation of the MPM carried out in 2019, under a project financed by a preparatory action of the European Parliament. The implementation was conducted in 28 EU Member States, Albania 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 partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the case of 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. In Denmark the CMPF partnered with Vibeke Borberg (Independent expert - Attorney-at-Law, PhD), who conducted the data collection, scored and commented the variables in the questionnaire and interviewed relevant experts. The 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 Table 1 below).

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Table 1: Areas and Indicators of the Media Pluralism Monitor

The Monitor does not consider the digital dimension to be an isolated area but rather as intertwined with traditional media and existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor allows for an extraction of a digital-specific risk score and the report contains a specific analysis of risks related to the digital news environment. 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.

**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 MPM2020 scores may not be fully comparable with MPM2017 ones. For more details, see the CMPF report on MPM2020, soon available on: [http://cmpf.eui.eu/media-pluralism-monitor/](http://cmpf.eui.eu/media-pluralism-monitor/).
2. Introduction

Denmark is a small country in Scandinavia 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 to support and uphold media in Danish language. Denmark is a universal welfare state and the welfare system is implemented in all areas of public service such as healthcare, education, day and permanent care of children, the elderly, disabled and disadvantaged citizens, pensions and public welfare, flexicurity etc. The country, however, 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. 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 considered so 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. Both of the two Danish tv stations - Danish Broadcasting Corporation (DR) and TV2 - are owned by the state and DR is entirely state funded. DR is a dominant player in radio and the TV market, as well on the internet. Initially TV2 was funded by both advertising revenue and licensing funds, but today TV2 is fully based on a advertising and subscription business model. TV2 is known for its network of regional news stations which receive public service funds. The most important online news sites are DR, TV2 and the big newspapers. Denmark has seen the emergence of newspapers founded as online only; among other Altinget, POV and Watch Medier.

Denmark does not have specific laws regulating ownership of media, instead the media market is regulated by the general 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: while Basic Protection and Political Independence are situated in the low risk band, Market Plurality is in the medium risk band. Social Inclusiveness is in the medium risk band, but only slightly exceeding the low risk divider.

The report shows a high risk regarding news media concentration and access to media for minorities. The high risk assessment of news media concentration mainly refers to the fact that Denmark has not introduced media specific regulation on thresholds or other limitations in order to prevent a high degree of horizontal concentration of ownership in the news media sector. Instead, the general competition legislation applies on the media sector the same way it applies on other industries.

Regarding access to media for minorities, the high risk assessment is based on research suggesting that minorities are underrepresented in the media. This is particularly pronounced for immigrants depending on which ethnic minority they belong to, but also women and disabled persons appear to be underrepresented. Public service media do not seem to have adopted guidelines or ethical rules in order to ensure a more balanced representation.

The evaluation of online-related risks shows that the risk is higher than for the overall assessment. This is mainly due to a medium risk assessment for Political Independence and Social Inclusiveness.

The result reflects among other reasons the lack of regulation aiming to ensure equal opportunities and transparency of online political advertising during electoral campaigns. No specific regulation on disclosure of campaign spending on online platforms applies to political parties and the ban against political advertising on television does not apply to online advertising.

The medium risk assessment for Social Inclusiveness online mainly refers results on media literacy. Even though media literacy must be offered as an elective program in both elementary schools and high schools as part of the general education policy and that media literacy is built in and phrased in the political Media Agreements, there is no direct policy on media literacy in Denmark. Furthermore, the enforcement of the regulatory framework and self-regulatory initiatives aiming to protect minorities against hate speech online are not fully effective.
3.1. Basic Protection (16% - 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 except from the Protection of right to information indicator which is situated in the medium risk band (54%). The assessment refers to a number of different factors. First of all, the right to information is not explicitly protected in the Danish Constitution. Secondly, the Access to Public Information Act has been amended in 2014 limiting public and journalistic access to certain government files. Thirdly, there is not a regulatory framework in place to protect whistleblowers under Danish law.

Regarding the Protection of freedom of expression (low risk, 8%), 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 (11%). 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 of 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 the access to internet has a very low risk in Denmark (6%). 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 provisions on transparency of media ownership and the existence and effectiveness of regulation or self-regulation against commercial & owner influence on editorial content. In addition, they assess the risks related to market concentration in the production as well as in distribution of news: as for production, considering separately horizontal concentration in each sector and cross-media concentration; as for distribution, assessing the role of online platforms as gateways to news, the concentration of online advertising market, and the role of competition enforcement and regulatory safeguards in protecting information pluralism. Moreover, they seek to evaluate the viability of the news media market.

![Graph showing Market Plurality indicators](image)

The indicator on **Transparency of media ownership** scores at medium risk (38%). 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.

In Denmark, as mentioned above there are no separate rules for ownership of media companies, media outlets are simply subject to the general competition laws. Furthermore, public service media dominates the audiovisual media market and is concentrated in few media companies of which the largest are owned by the state. This is what creates the high risk for **News media concentration** (77%). 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 **Online platforms concentration and competition enforcement** scores a medium risk (40%). This is mainly due to the lack of legislative and enforcement initiatives specifically targeting online platform issues. While the Danish Competition and Consumer Authority within its organization has established the Center of Digital Platforms to supervise the area and enforce the competition laws, online activities are still regulated by the same competition rules which apply for any other industry.

The indicator on **Media viability** scores a medium risk of 65%. The medium risk assessment reflects a.o. a revenue decrease in audiovisual media sector and in the newspaper and press agencies sector. While the employment of journalist in the newspaper and press agencies sector is stationary, there has been a decrease of employment of journalists in the radio sector.

The risk for **Commercial and owner influence over editorial content** is low (30%) due to the fact that the arm length principle between news owners and the editorial level is highly respected. Furthermore, there are mechanisms granting...
3.3. Political Independence (26% - low risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks 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. Furthermore, the area concerns with the existence and effectiveness of (self)regulation in ensuring editorial independence and availability of plural political information and viewpoints, in particular during electoral periods.

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 33% risk, also because of the lack of specific regulation to guarantee autonomy when appointing and dismissing editors-in-chief. But overall, there has not been any cases of editors who have been removed for political reasons.

The indicator on **Audio visual media, online platform and elections** has a low risk, but in the higher end (29%) On one hand 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. On the other hand there is no regulation in place that aims to ensure equal opportunities and transparency of online political advertising during electoral campaigns.

An extremely low score (3%) is observed when it comes to **State regulation of resources and support to media sector**. The score reflects the clear legislation on media support. Private media may apply for funds if they meet certain statutory 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 and funding** has a low risk in Denmark (17%) due to the “arm’s length principle”. However, it is still debated whether the current Media Agreement and Public Service Agreement sufficiently ensure that funding adequately covers the online public service missions of the PSM without...
distorting competition with private media actor.

3.4. Social Inclusiveness (38% - medium 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 high risk (88%). The high risk assessment is mainly based on research suggesting that minorities are underrepresented in the media. This is particularly pronounced for immigrants depending on which ethnic minority they belong to, but also women and disabled persons appear to be underrepresented. The lack of programs for minority groups is mirrored in the assessment since DR has stopped producing news in immigrant languages such as Arabic and Somali. Public service media have editorial autonomy and decide who should have airtime or not and public service media do not seem to have adopted guidelines or ethical rules in order to ensure a more balanced representation.

The indicator on **Access to media for local/regional communities and for community media** score a medium risk (50%). On one hand Denmark has many local and regional newspapers as well as the network of public service regional TV-stations produced by TV2. Both regional and local media and community media enjoy the same media legal safeguards as any other media. On the other hand, either regional or local media or community are granted access to media platforms by law.

The indicator on **Access to media for people with disabilities** has a low risk (3%). This is due to the fact that the public service contract explicitly states the need for addressing these issues. There is also an on-going dialogue between the organisations representing people with disabilities and the PSM.

The indicator on **Access to media for women** scores low risk (19%). Women are still underrepresented compared to men in the news. A count of the representation of sources in the Danish newspaper Politiken (print and digital) showed that approximately 75% of all sources were male (2015) and the Swedish analytical bureau Prognosis has confirmed that the representation of women in Danish media is only 33% (August 2019). On the other hand women are well
represented in the key positions in PSM.

The **Media literacy** indicator is at a low risk (31%), but in the higher end. Even though there is no direct policy on media literacy in Denmark, media literacy is an integrated part of the curriculum of both primary and secondary education – and in the colleges where teachers are educated. However, the efforts to remove hate speech toward ethnic or religious minorities from social media have not always been effective and this also seems to apply for the regulatory framework to counter hate speech.
4. Pluralism in the online environment: assessment of the risks

Denmark: Media Pluralism Risk Areas - Digital

The evaluation of online-related risks shows that the risk is higher than for the overall assessment. This is mainly due to the lack of regulation specifically targeting online activities, including transparency of online political advertising and legislative initiatives on online platforms concentration and competition enforcement.

**Basic Protection**

The recognition of Freedom of Expression in the Danish Constitution covers both online and offline media activities. In general, the same laws and safeguards apply to journalistic work in online news media as to the traditional media, but there are exemptions. There are regulatory frameworks in place - both by law and self-regulatory - aiming to protect minorities against hate speech online, but the enforcement is not fully effective.

Denmark is generally a very safe country for journalists without attacks or threats to the physical safety of journalists. There has not been conducted any research on the digital safety of journalists, and it is therefore difficult to state anything exact on the problems related to digital harassment of journalists. According to “The Journalist” (magazine of the Danish Union of Journalists) digital harassment is a huge and growing problem for journalists - especially for female journalists - and the magazine reports that a network of journalists who have experienced digital harassment has been established (May 2019).

The exception of personal data processing for journalistic purposes is recognized and effective under Danish law and the exception applies for both traditional and digital media. The Danish Government has recently decided - once again - to delay a revision of the Danish data retention legislation until 2020 in order to await the EU-Commission’s guidelines on the subject.

**Market Plurality**

The number of native digital media is very high. 85% of Danish internet users use the internet to access news online and 90% of the Danish population have an account on Facebook. The percentage of the population that has basic or above basic overall digital skills is 90%, while 27% have low overall digital skills. The percentage of broadband for Denmark is 95.4 (2018) and Denmark follows the EU rules on safeguards of net neutrality and the area is effectively supervised by the Danish Energy Agency which is a part of the Danish Ministry of Energy, Utilities and Climate.

While there is no data on revenue and employment trends on the digital media market, the internet advertising revenue has increased by DKK 560 million over the past year (9.1%). The total advertising revenue increased with 1.4% from...
2015 to 2016 and thus follows GDP growth of 1.3%. The online advertising market share of the Top4 online competitors in Denmark is 60% and the advertising revenue on the internet targeted Danish media users amounts more than half of the total Danish advertising revenue (includes print media, TV, radio, internet) with 50.2% (2016). Hereof went 56.6% to foreign advertisers. In the same period of time there was a significant decline in advertising revenue for print media in particular.

There is a lack of legislative initiatives specifically targeting online platforms concentration and competition enforcement. While the Danish Competition and Consumer Authority within its organization has established the Center of Digital Platforms in order to supervise the area and enforce the competition laws, online activities are still regulated by the same competition rules that apply to any other industry.

The Danish competition legislation does not contain media specific regulation targeting the competition issues of the media sector including the digital media market. By contrast, the media sector is regulated by the same competition laws as any other industry and this applies to both traditional and digital media.

Accordingly, there are no media specific ownership provisions under Danish law and the Danish competition legislation does not contain media specific thresholds or other limitations in order to prevent a high degree of horizontal concentration of ownership in the news media sector or cross-media concentration. While all professional news media - traditional and digital - must register to enroll in VAT and tax systems etc., these requirements do not apply to hobby or amateur news media in an informal setup without employees. The exception for hobby or amateur news media is part of the freedom of expression protection under Danish law. If a traditional or digital news media is registered, the basic information about the enterprise is publicly available online.

The question of editorial independence of commercial influence is governed by the EU marketing regulation and includes, among other, rules on sponsorships and advertising in the television, native advertising and advertorials. Advertorials are not prohibited under Danish law, but they must be clearly declared in order to comply with the law. The regulation and requirements are enforced by the Consumer Ombudsman and the Radio and TV Board depending on the specific media and case.

**Political Independence**

There is no political control over digital media and the impression is that established political influence on them is low or none. A number of political parties have established their own online news sites, but they stress that there is no political interference with the editorial decisions of their media. There is lack of regulation aiming to ensure equal opportunities and transparency of online political advertising during electoral campaigns. No specific regulation on disclosure of campaign spending on online platforms applies to political parties. The ban on political advertising on television does not apply to radio or online news and social media platforms and political advertising online is only subject to the general marketing regulation.

The Danish media support schemes cover both online and print media and media support is granted upon application and in accordance with statutory criteria. The law does not provide that funding adequately covers the online public service missions of the PSM without distorting competition with private media actors, but the issue is addressed in the current PSM agreement with DR limiting some of DR’s activities online. The actual practice is, however, consistently criticized by private media and Danish Media (publishers association).

There have not yet been any regulatory incentives specifically supporting online media and pluralism. The outdated but still applicable Media Liability Act does not cover digital news outlets unless the media voluntarily has signed up to the Press Council. It has been suggested to provide the Media Liability Act with a technology neutral scope, but legislative initiatives have not yet been taken. As various journalist rights are linked to the Media Liability Act, the fact that the law does not apply to digital media without registration may affect their enjoyment of source protection and other journalistic rights.

**Social Inclusiveness**

The Centre for Media Pluralism and Media Freedom is co-financed by the European Union
5. Conclusions

The MPM analysis for Denmark shows a low risk for media pluralism in two areas covered by the study - Basic Protection and Political Independence - and a medium risk for Market Plurality and Social Inclusiveness. Social Inclusiveness is situated in the medium risk band, but only slightly exceeding the low risk divider. 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. Both of the two Danish tv stations are owned by the state and one of them is entirely state funded. It also affects the evaluation of the market plurality that Denmark has not introduced media specific regulation on thresholds or other limitations in order to prevent a high degree of horizontal concentration of ownership in the news media sector. Instead, the general competition legislation applies on the media sector the same way it applies on other industries.

On the other hand, the relatively low risk to media pluralism in Denmark is also related to the state involvement in media. The government promotes and maintains a high degree of media diversity by comprehensive media support programs which are available to all kind of media that meet certain well defined criteria.

The low risk related to media pluralism in Denmark also reflects 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, in connection with the latest renegotiation of the political Media Agreement and the PSM contract with DR - and the public procurement of a PSM radio channel - politicians have been criticized for not respecting the “arm’s length principle” sufficiently.

The conditions for access to the media for minorities represent a risk to the media pluralism in Denmark in the area of Social Inclusiveness. The assessment is based on research suggesting that minorities are underrepresented in the media. This is particularly pronounced for immigrants depending on which ethnic minority they belong to, but also women and disabled persons appear to be underrepresented. In spite of this public service media do not seem to have adopted guidelines or ethical rules in order to ensure a more balanced representation.

The evaluation of online-related risks shows that the risk is higher than for the overall assessment mainly relating to the areas of Political Independence and Social Inclusiveness. The result of the evaluation reflects among other reasons the lack of regulation aiming to ensure equal opportunities and transparency of online political advertising during electoral campaigns and that the ban against political advertising on television does not apply to radio and online advertising. Furthermore, the higher risk reflects that the enforcement of the regulatory framework and self-regulatory initiatives aiming to protect minorities against hate speech online are not fully effective.
6. References

3. The Danish Competition and Consumer Authority's publication on digital platforms: https://www.kfst.dk/media/55725/digitale-platforme.pdf
4. Prognosis' Gender Equality Analysis on Denmark: http://www.prognosis.se/GE/Denmark/
5. Representation of ethnic minorities in the media: https://pluralisterne.dk/ansvarligpresse/
### ANNEXE I. COUNTRY TEAM

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<tr>
<td>Vibeke</td>
<td>Borberg</td>
<td>Attorney-at-Law, PhD</td>
<td>Independent expert - Attorney-at-Law, PhD</td>
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### ANNEXE II. 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.

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<tr>
<td>Hans Jørgen</td>
<td>Dybro</td>
<td>Policy Consultant</td>
<td>Dansk Journalistforbund (Danish Union of Journalists)</td>
</tr>
<tr>
<td>Caroline</td>
<td>Heine-Jørgensen</td>
<td>Professor of Law / Chairman of the Danish Radio and Television Board</td>
<td>University of Copenhagen / Danish Radio and Television Board (media regulator)</td>
</tr>
<tr>
<td>Christine</td>
<td>Sørensen</td>
<td>Public Policy and Government Relations Manager</td>
<td>Google Denmark</td>
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