

# MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

## APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, THE REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2020

Country report: Luxembourg

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**Research Project Report**

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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 of the European Union and in candidate countries. This narrative report has been produced on the basis of the implementation of the MPM carried out in 2020. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.*

## 1.2. Methodological note

### Authorship and review

*The CMPF partners with experienced, independent national researchers to carry out the data collection and author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire developed by the CMPF.*

*In Luxembourg the CMPF partnered with Dr. Raphael Kies and Mohamed Hamdi (University of Luxembourg), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the 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). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.*

*Risks to media pluralism are examined in four main thematic areas: Fundamental 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).*

<b>Fundamental Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

## The digital dimension

*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 also extracts digital-specific risk scores and the report contains a specific analysis of risks related to the digital news environment.*

## The calculation of risk

*The results for each thematic area and indicator are presented on a scale from 0 to 100%.*

*Scores between 0 and 33%: low risk*

*Scores between 34 to 66%: medium risk*

*Scores between 67 and 100%: high risk*

With regard to indicators, scores of 0 are rated 3% while scores of 100 are 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, nor the position of the members composing the Group of Experts. It 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, MPM2021 scores may not be fully comparable with previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2021, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

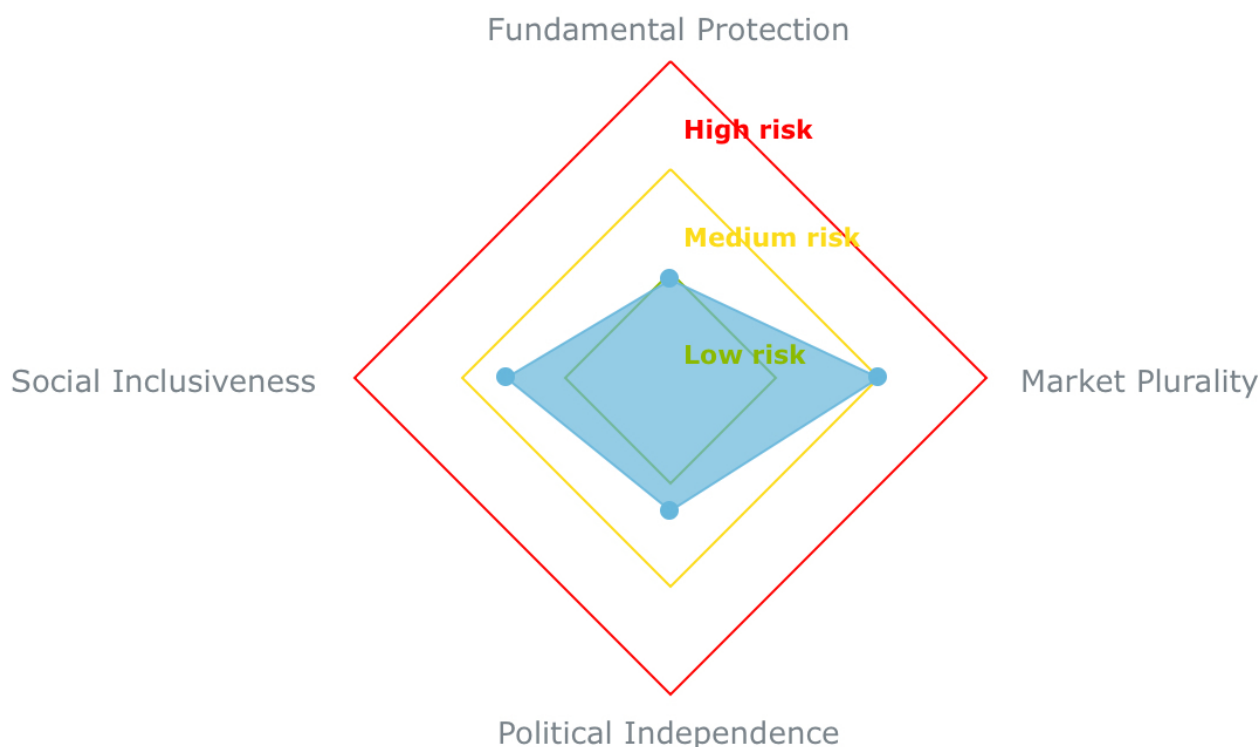
## 2. Introduction

- **Population:** With 634,000 inhabitants in 2021, Luxembourg is one of the smallest, but also richest and most politically stable countries in Europe. The country is largely dependent on foreign working force (the number of inhabitants being largely insufficient to cover labor requirements) which explains that there is a persistently high migration rate (47.5% of foreigners on 1st January 2021) and an increasing number of cross-border workers (around 200,000 in 2019, or 20,000 more than in 2017) - especially from France and Belgium. This demographic feature creates political and social challenges not only in terms of social cohesion, but also of democratic legitimacy.
- **Languages:** The linguistic situation in Luxembourg is highly complex and peculiar as it is characterized by the practice and the recognition of three official languages (also referred to as administrative languages): French, German, and the national language Luxembourgish, established by law in 1984. Many other languages are spoken, in particular Portuguese (the largest foreign community) and English (essentially spoken by employees of financial institutions and international organisations). While there are several commercial radio channels targeting this multilingual public (e.g. *Radio Latina* for the Portuguese speaking community or *Radio ARA* for the French, English, Arabic and Italian speaking communities), the PSM (i.e. the sociocultural radio, *Radio 100,7*) and *RTL* (the main commercial radio and television company, that has public service missions) broadcast mainly in Luxembourgish.
- **Political situation:** Luxembourg is a very stable country with strong political parties and trade unions. The Christian-Social People's Party (CSV) has been Luxembourg's largest party at the national level since 1945 and held the prime minister position in all post-war government coalitions except for the periods from 1974 to 1979 and since 2013. For the last two terms, the electoral coalition has been composed of the Liberal party (DP), the Socialist party (LSAP) and the Green party (Déi Grønn). Despite these changes, Luxembourgish politics remains at the center of the political spectrum and is characterized by a pragmatic approach.
- **Media market:** The media market in Luxembourg is surprisingly rich compared to its size and the number of inhabitants. The country exercises an important role in the management of international media concessions. The print sector includes five daily newspapers, one free daily newspaper, and several magazines, weekly and monthly newspapers. The TV market is dominated by *RTL* and there are 5 TV stations (four local and one national), but residents also have access to channels from the neighboring countries. *RTL* is the biggest broadcaster and has a "public service mission" but is not a "public service medium". There are about seven private radio stations with national coverage and only one radio broadcaster (*Radio 100,7*) that is officially recognized as a public service medium (PSM). Internet coverage is very good across the country. This apparent diversity, however, should not hide a very large concentration (horizontal and transversal) of the market, since the majority of the national press belongs to two publishing houses while the audiovisual sector is dominated by one group (CLT-UFA).



### 3. Results from the data collection: assessment of the risks to media pluralism

#### Luxembourg: Media Pluralism Risk Areas



JS chart by amCharts

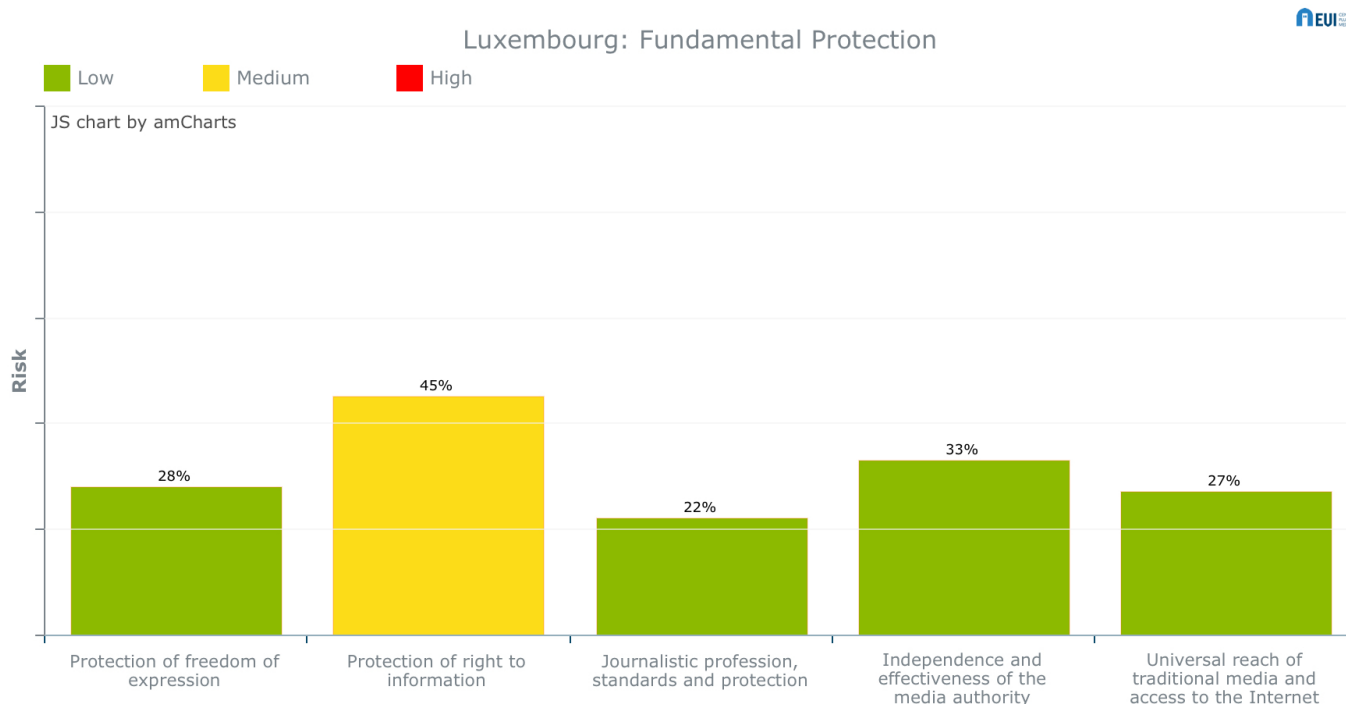
The Luxembourgish media landscape has been undergoing important changes in the last couple of years which affect or will affect its pluralism. On the legal level two important changes are in discussion. First of all, Luxembourg is planning to strengthen the independence of the socio-cultural radio station 100komma7 which will soon officially be recognised as the national PSM. Furthermore, the selection procedures of the board of governance will be reviewed as well as its role and duties. While the law can still be improved, it constitutes a long-needed step since Luxembourg was up until now the only country in the EU which did not have a PSM. Secondly, the public aid scheme for the written press is about to be reviewed in order to adapt it to the new realities on the ground. Online media and community media will also be able to benefit from public subsidies. Furthermore, the amount will not depend on the number of pages but on the number of professional journalists employed. Generally speaking, fundamental protections are well implemented in Luxembourg and the media are increasingly politically independent. Notwithstanding, access to information is still limited - the context of the COVID-19 pandemic has again shown the deficiencies - and the governance, competence and resources of the media authority are insufficient. The two most critical areas remain market plurality and social inclusiveness. Concerning the first area, Luxembourg continues to have a highly concentrated media landscape. The audiovisual and online sector is dominated by the RTL Group and in the printed press the Groups Saint Paul and Editpress prevail. However, both Saint Paul and Editpress have been facing serious financial difficulties - that have been accentuated by the COVID-19 pandemic - which lead to important rearrangements. In addition, there no legal provision aimed at limiting horizontal or cross-media concentration of news media and the laws on media ownership and transparency have serious flaws. With regards to social inclusion, access to minorities – in particular linguistic minorities (for the audiovisual sector and the PSM) and people with disabilities- is insufficient. Access to media for



women is also extremely critical, in particular with regards to their presence in supervising and executive positions.

### 3.1. Fundamental Protection (31% - low risk)

*The Fundamental 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.*



#### Protection of the freedom of expression (28%, low risk)

As in 2020, the indicator Protection of freedom of expression scores a low risk (28%). Freedom of expression is explicitly recognised in the Constitution and protected by national law<sup>[1]</sup>. Luxembourg has also signed and ratified important international treaties related to this matter. As a consequence, cases of attack to freedom of expression are rare (see, however, chamber-Leaks affair in the MPM 2019). Journalists complained about the limited access to information related to the COVID-19 pandemic - such as the location of clusters of contagions or the access of certain statistics (for example, schools). The president of the press council also criticized the increasing habit of politicians to communicate directly with the public via social media instead of conveying the information via journalists. Defamation is not decriminalised, but criminal defamation prosecutions against the media are extremely rare, and court decisions are proportionate.

#### Protection of the right to information (45%, medium risk)

The indicator protection of the right to information remains at medium risk (45%). After a long waiting period and repeated demands from civil society and journalist organizations, the right to information has been enshrined in Luxembourg's legislation in September 2018<sup>[2]</sup>, but not in the constitution (see MPM 2020). From the viewpoint of the effectiveness of the law, the Luxembourg Union of Journalists (ALJP) supported by different organisation of the civil society observe that there are still cases where information is retained in

an arbitrary way (see: <https://www.facebook.com/Informationuszougang>). Moreover, it regrets the fact that journalists do not benefit from more efficient procedures to access information. While there is a regulatory framework in place to protect whistleblowers, it is considered too restrictive because it is mainly limited to cases of corruption, trading in influence or money laundering and can concern only employment relationships.

### **Journalistic profession, standards and protection (22%, low risk)**

The indicator on the Journalistic profession, while still considered to be at low risk, deteriorated compared to last year (22% compared to 6% in 2020). The already existing crisis of the media sector - partly due to its structural digital transformation and the decrease of revenues from ads (see MPM 2020) - has been accelerated and intensified by the COVID-19 pandemic. Saint-Paul Group had to cut numerous employments after being bought by the Belgian group Mediahuis. Several radio companies also suffer from this crisis. For instance, the community radio ARA has launched a crowdfunding action for its survival. In order to face this situation, the state has launched a support scheme to alleviate the impact of the COVID-19 pandemic, based on the number of journalists employed. It consists of an amount of 5,000 euros per journalist linked to the publisher by an indefinite contract. In parallel, a new law regarding the public funding of the journalistic profession has been presented and discussed<sup>[3]</sup>. This new law seeks to modernise a scheme developed in 1976 and adapt it to the new digital environment in order to maintain a fair level of journalists' diversity and safe working conditions.

Journalists are legally protected in cases of editorial change, and their sources are safeguarded. In addition, the interests of journalists are protected by the *Association Luxembourgeoise des journalistes professionnels*, which works only on a benevolent basis though (see MPM 2020). While no cases of physical threats against journalists have been reported in recent years, Luxembourg is not immune against cases of strategic lawsuits against public participation (SLAPPs), which are assessed for the first time in MPM. For example, in 2020, the Luxembourgish private-intelligence firm Sandstone has threatened to start litigation against Euronews that published an article about the Maltese journalist Daphne Caruana Galizia, who was assassinated in 2017 for her investigative journalism.

### **Independence and effectiveness of the media authority (33%, low risk).**

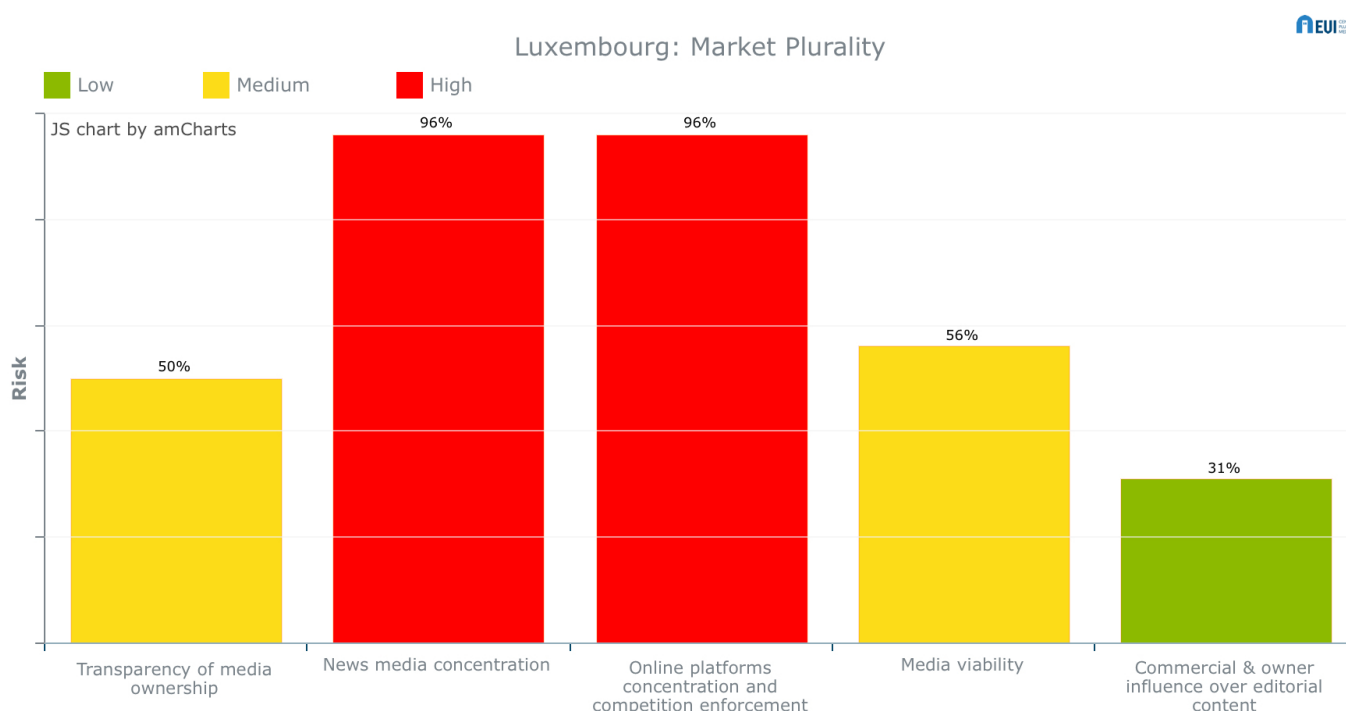
The indicator on independence and effectiveness of the media authority (ALIA) presents a low risk (33%). The modified Law on Electronic Media<sup>[4]</sup> (1991) holds that the media authority is a public establishment of an independent administrative character. Its tasks and responsibilities are defined in detail in the law. All five members of the Executive Board - as well as the Director - are chosen on the proposal of the government, but there is no clear procedure on how the government selects and agrees on a candidate. Generally speaking, ALIA acts independently from external influences, and its decisions list the arguments and legal provisions that support its reasoning. However, the powers of ALIA are restricted in several ways. First of all, it does not have the human resources and competencies (most of the seven employees have no background in media regulation law) to deal efficiently with the many tasks allocated to it by law. Secondly, ALIA does not have the competence to award national and international frequencies, which only the government can do. This has led to controversial, if not contradictory, decisions. Thirdly, the audiovisual media landscape of Luxembourg is dominated by one company - i.e. RTL Group - which also enjoys favourable conditions bequeathed to it by the government of Luxembourg with regards to its national and international frequencies. As a result, ALIA has seemed reluctant to target this company in the past, earning it a reputation of having no teeth when it comes to dealing with RTL. President Thierry Hoscheit has been insisting for several years that the competencies of the ALIA be extended. This would indeed be an important step as it would avoid contradictions in Luxembourg's media regulation and media policies.

### Universal reach of traditional media and access to the Internet (27%, low risk)

As last year the indicator Universal reach of traditional media and access to the Internet scores low risk (27%). As indicated in the precedent reports, there is no obligation (in law or in conventions) for universal coverage of public service media. Nevertheless, after receiving a second radio frequency in July 2017, the national public service radio (*Radio 100.7*) reached almost universal coverage. As far as Internet access is concerned, 93.6% of the population is connected to broadband in Luxembourg. The Post dominates the market share with about 65%, followed by Proximus (around 15%), Luxembourg online (about 7%) and Orange (about 5%). According to the ILR, there is a "strong presumption of dominance" for Post in the retail broadband market as it enjoys the largest market share in Europe. The watchdog also noted that Post Telecom's relative importance in the market was accentuated by the fact its technology branch – Post Technologies – was the main wholesale supplier for the majority of alternative operators, as only 10% of the residential and non-residential broadband access services were based on infrastructure that is not owned by the Post. It, therefore, proposes to regulate the wholesale market for broadband access to increase competition in the retail internet market. Equal treatment of internet communication (net neutrality) is also supervised by the ILR, which is responsible for monitoring compliance with the obligations arising from the application of EU Regulation 2015/21201 and prepares since 2017 an annual report on Internet neutrality activities.

### 3.2. Market Plurality (66% - medium risk)

*The Market Plurality area focuses on the economic risks to media pluralism, deriving from lack of transparency and concentration of ownership, sustainability of the media industry, exposure of journalism to commercial interests. The first indicator examines the existence and effectiveness of provisions on transparency of media ownership. Lack of competition and external pluralism is assessed separately for the news media (production of the news) and for the online platforms (gateways to the news), considering separately horizontal and cross-media concentration; the concentration of online advertising market; and the role of competition enforcement. The indicator on media viability measures the trend of revenues and employment, in relation with GDP trends. The last indicator aims to assess risks to market plurality posed by business interests on production of editorial content, both from commercial and owners influence*



### **Transparency of media ownership (50%, medium risk)**

The indicator on transparency of media ownership scores a medium risk with a value of 50%. While there are laws in Luxembourg aimed to disclose the owners of news media, some articles of these laws conflict with each others. According to the Law on Freedom of Expression in the Media (2004), media are annually obliged to disclose the identity of their owners holding directly or indirectly at 25% of the shares and provide no sanctions in case of failure to do so. However, the law explicitly states that electronic media are not required to publish this information (Art 69). In contradiction with this law, Luxembourg transposed in January 2019 two European directives on the implementation of a Beneficial Owner Register ("RBE"), which request all the companies (including electronic and non electronic media companies) registered at the Luxembourg *Registre des commerces et société* to disclose their ultimate beneficial owners as defined by article 1 (7) of the law dated 12 November 2004 on the fight against money laundering and terrorist financing, as amended<sup>[5]</sup>. This article defines the ultimate beneficial owner as a natural person (1) holding or controlling directly or indirectly by 25% plus one share of a company, (2) having a control by any other means or (3) if no natural person has been identified under (1) and (2) any natural person who holds the position of senior managing official. Access to ultimate beneficial owners information is, however, hardly improved by the application of this law, because many media companies do not reveal their ultimate beneficial owner as none holds directly or indirectly more than 25% of the shares.

### **Concentration of media ownership (96%, high risk)**

Media concentration remains a big issue in the Luxembourgish media landscape. It is generally seen as an inevitable fact due to the size of the market. Luxembourg remains one of the very few EU member states lacking a national merger control law or a similar provision aimed at limiting horizontal or cross-media concentration of news media. Furthermore, there is no administrative authority or judicial body effectively addressing issues relating to media concentration. The printing sector is dominated by Editpress and Saint-Paul Group - both of which have been facing financial difficulties resulting in layoffs and divestments. The audiovisual sector is dominated by RTL Group, which also has a monopoly in the commercial TV sector. This can be explained by the historical role of RTL, the size of the country - and the accordingly small size of the advertising market -, as well as its multilingual setting (which implies a large consumption of foreign TV channels). RTL Group also fully or partially owns the four biggest radio stations of the country - i.e. RTL Radio Lëtzebuerg, L'Essentiel Radio, Eldorado and RTL Radio. Given its dominant position in the audiovisual sector, RTL is obliged to produce a high-quality public service program even though it is a private company belonging to the German giant Bertelsman. Bertelsman has insinuated that it no longer wants to bear the burden of the Luxembourgish public service and its actions have suggested that it is putting pressure on the government to reach a better deal. The contract between Bertelsman, RTL and the government have not been published and the details of the deal are therefore unknown. However, Sven Clement, the deputy of the Pirate party has taken the government to court for refusing to let the parliament consult the documents. The Court decided in the beginning of 2021 that the deputies had a right to read the secret deals.

### **Online platforms concentration and competition enforcement (96%, high risk)**

Despite the growing importance of the online news environment, Luxembourg lags behind in quantitative and qualitative research on online news consumption. No publicly available studies shed light on audience and advertising concentration online. While there is no doubt in the growing importance of online platforms in the way news are accessed and consumed, it is impossible to assess the degree of online news consumption and online platform concentration due to the lack of data. However, it is obvious that the lack of legal provisions limiting media concentration offline also applies to online platforms. The shortcomings are therefore similar to the ones cited above. Same goes for the advertising market, which is not regulated

in such a way as to prevent concentration and enforce competition. Furthermore, regulatory safeguards are not effective enough to ensure that money allocated to media with a public service mission do not cause disproportionate effects on (online) competition.

### **Media viability (56%, medium risk)**

The risk of this indicator has increased from 37% in last year's report to 56% this year. The main reason for this increase is the COVID-19 pandemic, which has severely affected the whole media sector of Luxembourg. According to the latest data available at the time of compiling the Media Pluralism Monitor questionnaire, advertising revenues have starkly dropped from 1st semester 2019 to 1 semester 2020. Luxembourg Ad'Report has measured a decrease in the radio, TV and newspaper sectors. No data are available for digital (native) media nor for local and community media. However, the pandemic alone does not explain the financial issues of the national media sector. Many news companies have suffered revenue losses long before the COVID-19 crisis hit home. The virus has merely aggravated a situation that was already dire due to mismanagement and a lack of revenues. In order to assist the news media during the COVID-19 crisis, the government has introduced an ad hoc aid in May 2020.

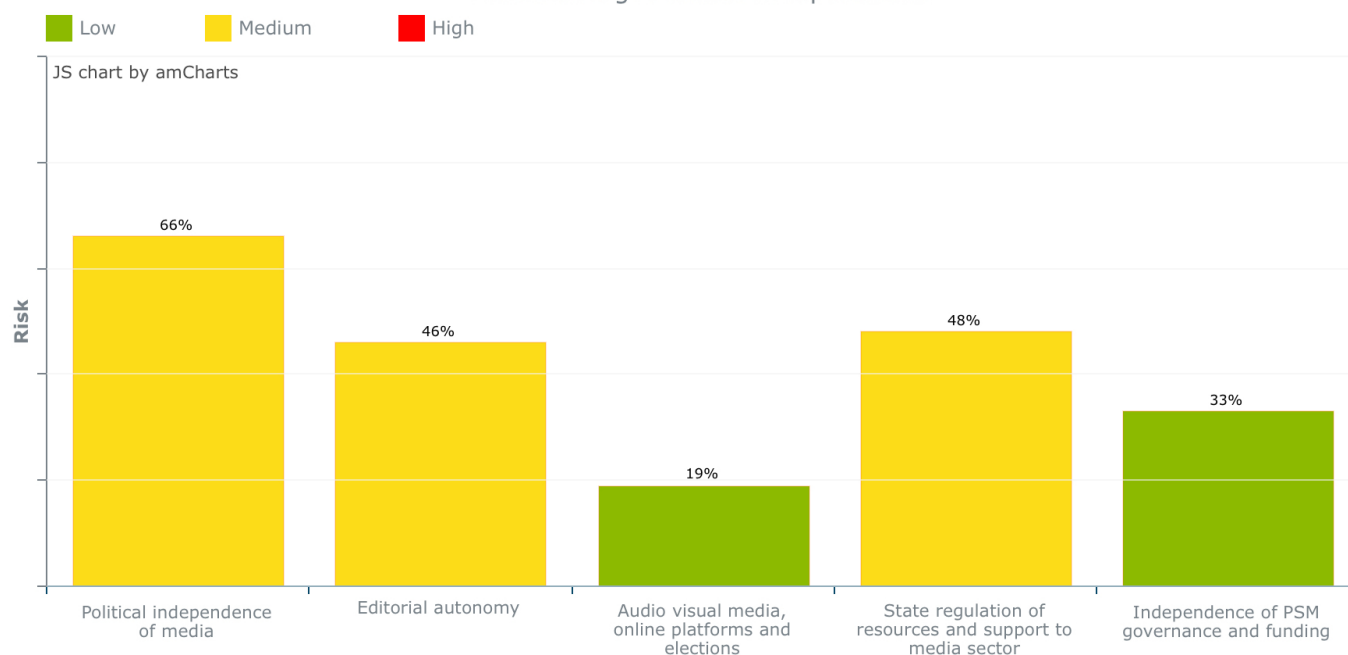
### **Commercial & owner influence over editorial content (low risk, 31%)**

The deontological code for journalists requires journalists and editors to be independent of any commercial interest and to not accept any benefits or promises that could limit their independence and the expression of their own opinion. However, there are no national laws or self-regulatory instruments ensuring that the decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests. As far as we can tell, external influence is not very high but the pressure on the editorial boards is relatively common - especially the pressure coming from advertisers. Journalists who were interviewed for this study have all confirmed they had witnessed instances of commercial pressure. Some of them have argued that it did not prevent them from doing their work in an independent way. Others, however, observed that direct and indirect influence has sporadically occurred. Especially self-censorship has become a recurring phenomenon. According to several journalists, this influence is increasing last year, due to the financial crisis of the press and to the small size of the advertising market. Advertorials are sometimes published in a misleading way but the practice of labelling them in order to distinguish them from editorial content is becoming more and more common. As to owner influence, legal safeguards exist in order to grant social protection to journalists in case of changes of ownership or editorial line.

### **3.3. Political Independence (42% - medium 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 is concerned 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.*

## Luxembourg: Political Independence



### Political independence of media (medium risk, 66%)

The printed press has historically had close ties to political parties or interest groups. While it has emancipated itself more and more from partisan influence, the links continue to exist and the risk of outside interference and conflicts of interest is real. One recent example brought to light yet again the conflicts of interests between the political class and the media. Unbeknownst to the public, the president of the Luxembourgish Parliament Fernand Etgen, who is member of the liberal party DP, had struck a deal with the online daily newspaper Lëtzebuerger Journal, which also belongs to the liberal party. The newspaper would have received an annual amount of 30,000 Euros for the publication of the parliamentary minutes. When the details of this deal emerged, Etgen was forced to backtrack. The audiovisual sector is more strongly regulated than the written press as it is placed under the supervision of the independent media authority ALIA. While RTL appears to be rather independent politically, ALIA notes in a report that television broadcasts produced by municipalities on a local level could be used for political propaganda as the editorial responsibility lies in the municipality itself.

### Editorial autonomy (medium risk, 46%)

The Code of Ethics elaborated by the Press Council does not explicitly cover political independence. There are no regulations or laws guaranteeing autonomy when appointing and dismissing editors-in-chief. Traditionally, daily newspapers and political parties were closely connected and politicians used to dictate the content of the papers. This is not the case anymore even though links between parties and papers still exist. However, these links have weakened considerably in the last decade - among other things due to commercial considerations. This loss of political/ideological identity becomes all the clearer when considering the many transfers of journalists from one newspaper to another. There are occasional articles where the historical links with political parties or trade unions become visible - but it is unlikely that these articles are published at the behest of politicians or trade unionists. They are more likely an independent choice of the journalists/editors.

### Audio visual media, online platforms and elections (low risk, 19%)

The conventions between the State and the PSM stipulate that the latter must adhere to impartiality, pluralism and objectivity. It should however be noted that apart from these conventions, there is no law



guaranteeing access to airtime on PSM channels and services for political actors during election campaigns. In 2019, ALIA was in charge of supervising the conventions in order to make sure that they were respected even though ALIA lacks a legal basis to supervise, monitor and sanction media during the election campaigns. During the election, each party had the right to an equal amount of airing time for their political ads, which were freely broadcast. Furthermore, ALIA measured the speaking time allotted to politicians on RTL television during the coverage and the political debates. According to this undisclosed report, speaking time was more or less equal with some minor discrepancies.

### **State regulation of resources and support to media sector (medium risk, 48%)**

The legislation on state subsidies for the press is in the process of being reviewed and modernized. It is too early to forecast the impact of the new rules on the media landscape of Luxembourg. So far, the direct aid scheme was based on the number of printed pages. While this scheme was objective and transparent it did not necessarily improve the quality of the content. Furthermore, it did not take into account the growing online consumption of news. Recently, online media have been included in the aid scheme as well as community media. In the context of plummeting ads revenues due to the pandemic, a special COVID-19 aid has been introduced to support the media sectors. The newsrooms received 5000 euro for each full-time journalist they employ. With regards to indirect aid, there are no clear rules (nor recent data) and open data on the amount of allocated to each company. In absence of transparent rules, we estimate that there is a certain risk of unfair distribution.

### **Independence of PSM governance and funding (low risk, 33%)**

While there is no evidence for politically motivated nominations or dismissals of PSM directors, there was until recently no guarantee preventing such an interference. In the past, the appointment procedures for the board of directors have been rightly criticised. When the current government came to power in 2013 it appointed people who were close to the main party in government. As a result of internal opposition, new nomination rules were introduced in a new law on public service media that is under review.<sup>[6]</sup> This draft law has its shortcomings but it is certainly an improvement compared to the text of 1991. Governmental influence will become more difficult and the board of directors will be chosen based on competence and representativity.

Before this draft law, Luxembourg was the only country in the EU without a PSM. RTL - a private company - is obliged to produce PSM content due to its dominant role in the audiovisual sector and the publicly funded radio 100,7 was only described as the socio-cultural station. The law indicates for the first time, that radio 100,7 is officially a PSM and therefore has to respect the standards of objectivity and pluralism.

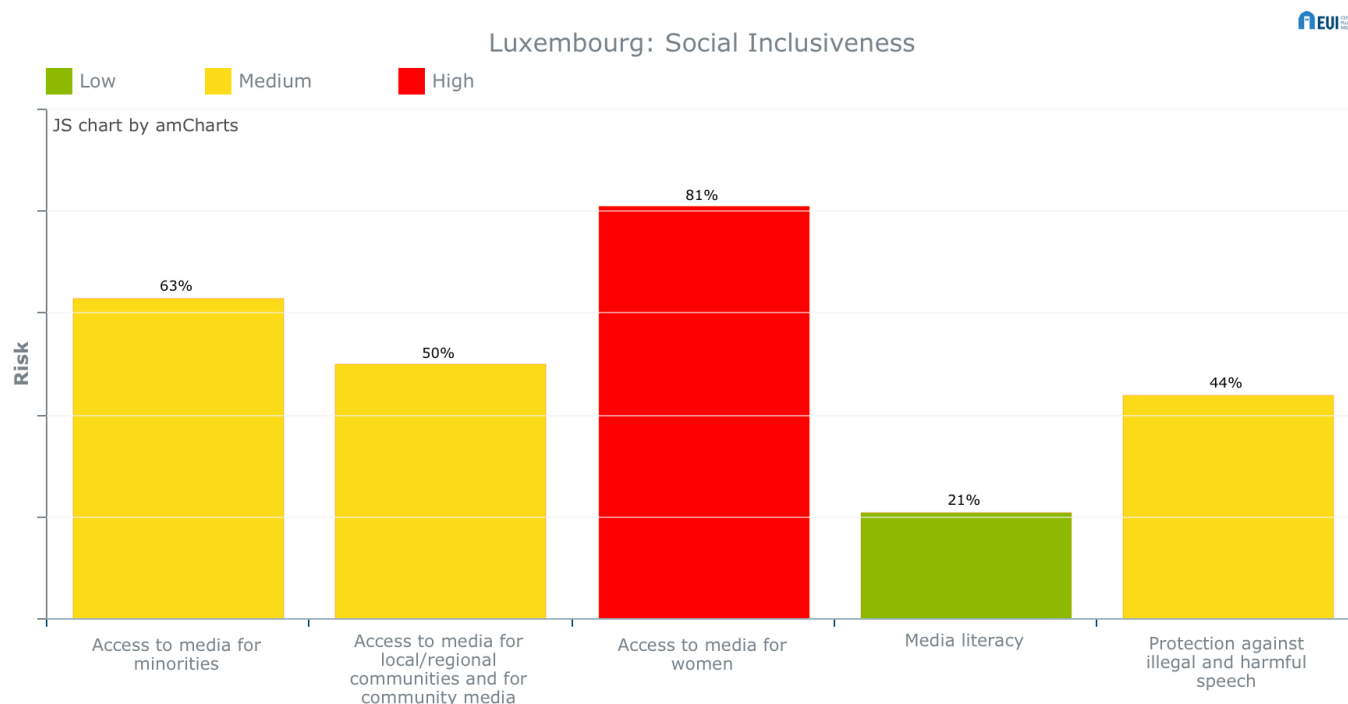
The budget for the PSM continues to be provided for by the state budget on the basis of a 5 to 10 year long agreement. The PSM is allowed to use other financial sources to fund its program - except advertisement, which is banned on air and online. The government can potentially stymie the development of the PSM via its budget - as it did when it refused to allocate the necessary means to create a French-speaking public service programme arguing that it didn't want to create a rivalry against the newly founded private French-speaking Essentiel Radio.

Despite these deficits, we believe the situation has greatly improved as the status of PSM is about to be reinforced in the law, thus reinforcing its independence from outside influence.

## **3.4. Social Inclusiveness (52% - medium risk)**

*The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. In addition, for the 2021 edition of the MPM, a new indicator has been added to the Social Inclusiveness area in order to assess new challenges*

raising from the uses of digital technologies: Protection against illegal and harmful speech. Due to this modification of the indicators, comparison with previous editions of the MPM should be handled with extreme care.



### Access to media for minorities (63%, medium risk)

The indicator on Access to media for minorities slightly improved from high to medium risk (from 75% in 2020 to 63% in 2021). While Luxembourg does not have any minorities in the sense of the Council of Europe's definition (which implies that such minorities should have Luxembourgish nationality), it has important linguistic minorities as almost half of the resident population are foreigners – among them a large number does not speak Luxembourgish. Despite this obvious multi-lingual diversity, the law does not guarantee access to airtime on PSM channels to minorities. The Law on electronic media of 1991, states that the socio-cultural radio is supposed to offer “a broad access to social and cultural organisations in Luxembourgish” (art. 14, al.4)<sup>[7]</sup>. In practice, the socio-cultural radio is essentially in Luxembourgish and does therefore not provide proportional access to airtime to the linguistic minorities. The same goes for RTL Télé Lëtzebuerg. Its public mission obligations state that it has to provide a daily program that is essentially in Luxembourgish and that it has a limited obligation to provide news with French subtitles for the evening replays and half an hour weekly program in one of the minority languages of the country<sup>[8]</sup>. As for the radio sector, the offer is more proportional as several radios target the linguistic minorities, such as for example radio Latina that targets the Lusophone minority. Relating to the print sector, the minority press, *i.e.* the press targeting foreign residents in Luxembourg, is considered to be rather proportionate.

Since last year, no progress was observed regarding the Access to the media for people with disabilities. The action plan that covers 2019-2024 aiming at implementing the United Convention on the Rights of Persons with Disabilities (ratified in 2011<sup>[9]</sup>) - which was published in 2020<sup>[10]</sup> – recognizes in its the necessity to make many adaptations to make print media and television accessible to all types of disabilities (see Kies and Hamdi, 2020), but surprisingly ignores the necessity to extent this access to digital media. In terms of concrete actions, the action plan is limited to make the media aware of the need to use information and communication technologies accessible to all and to invite the main TV shows to have subtitles and to be offered in plain language by 2023. These very limited and restricted objectives should be promoted by the Ministry of state and by the media authority, which as we have underlined above, has very limited



resources.

### **Access to media for local/regional communities and for community media (50%, medium risk)**

The indicator on Access to media for local/regional communities and for community media scores medium risk (50% in 2020 and 2021). There are no specific provisions granting legal recognition to community media as a distinct group (alongside commercial and public media) (see Kies and Hamdi, 2020). This situation, however, is about to change as a new law regarding the public funding of the journalistic profession, that is under review<sup>[11]</sup>, recognizes the existence of citizens' publishers. The new law provides a funding mechanism aimed at community media, i.e. non-commercial media including print, radio and audiovisual media with at least one or two professional journalists (proposed Amendment 15). To be eligible for an annual sum of €100,000, the organisation must also involve citizens in the editorial work and pursue the goals of media education, integration and social cohesion (Proposed amendment 16). The state estimates in its draft proposal that four media should benefit from this aid (for a total of 400,000 euro). It should be noted, however, that several community media already benefited since 2018 from a state support, under the credit line "Initiative in view of preserving the diversity of the media landscape"<sup>[12]</sup>. In 2020, for instance 240,000 euro were distributed to three community media: radio ARA, the monthly print publication Forum and the local audiovisual media Nordlicht TV. While the legal recognition is acknowledged as a progress by many, Radio ARA, estimates that this contribution is insufficient to cover the costs to fulfill the numerous legal missions attributed to the community media. In support of its argumentations, it insists on the fundamental role it has played during the COVID-19 pandemic to inform linguistic minorities that are not reached by other media. It also points to the fact that the new law does not consider "the massive number of community volunteers that are involved" by setting the "requirement of a minimum number of full-time journalists". In addition, the new law would ignore the fact that the costs for running a community media largely differ whether it is diffused on print, audiovisual, radio or exclusively online.

### **Access to media for women (81%, high risk)**

The indicator on Access to media remains at high risk (81%). Luxembourg is particularly weak in the presence of women in key positions. Accordingly, the PSM does not have a gender equality policy. There is however an equal representation of women in the PSM management board, but no women in the executive board. In the audiovisual sector (i.e. RTL television) the result is even worse as its management board (Clt-Ufa) is composed of only 17% of women (i.e. 3 women out of 18 members) and there are no women in the executive committee. In addition, there are no women in the executive board of the 8 leading news media companies in the country that is calculated on the bases of the 2 most relevant (based on readership and/or impact) news media per type (audiovisual, radio, newspapers, digital native). Finally, women are evidently and systematically less often invited by the media to comment on political and other relevant matters and events than male experts.

### **Media literacy (21%, low risk)**

The indicator on media literacy scores low risk, (21%). Policy on media literacy is improving due to several initiatives occurring in parallel that involve different categories of the population. Media literacy is present in the 2009 law on the organisation of primary school that states that media education should be integrated at different levels of the teaching (Art. 7)<sup>[13]</sup>. In addition, it is compulsory in secondary education (at the level of 7eme) and there are many initiatives aiming at promoting some aspects of media literacy within and outside the formal education system (see Bee Secure 2021). According to BEE secure, Luxembourg is the only European country to have implemented a mandatory online safety awareness training in its education system. For the last 10 years, Bee Secure has run an annual national campaign to raise public awareness on a specific theme in collaboration with other actors, among which the center for civic education (ZpB) and

the media authority (ALIA). Media literacy is likely to be improved in the future among journalists due to the new law for media financing<sup>[14]</sup> that requires the new categories of “citizens editors” to contribute to the promotion of media education and for the other editors to annually report actions taken in favor of media education (see amendements 14 to 17 of Project 7631 which aim to modify art. 9, 10 and 11 of the existing law<sup>[15]</sup>).

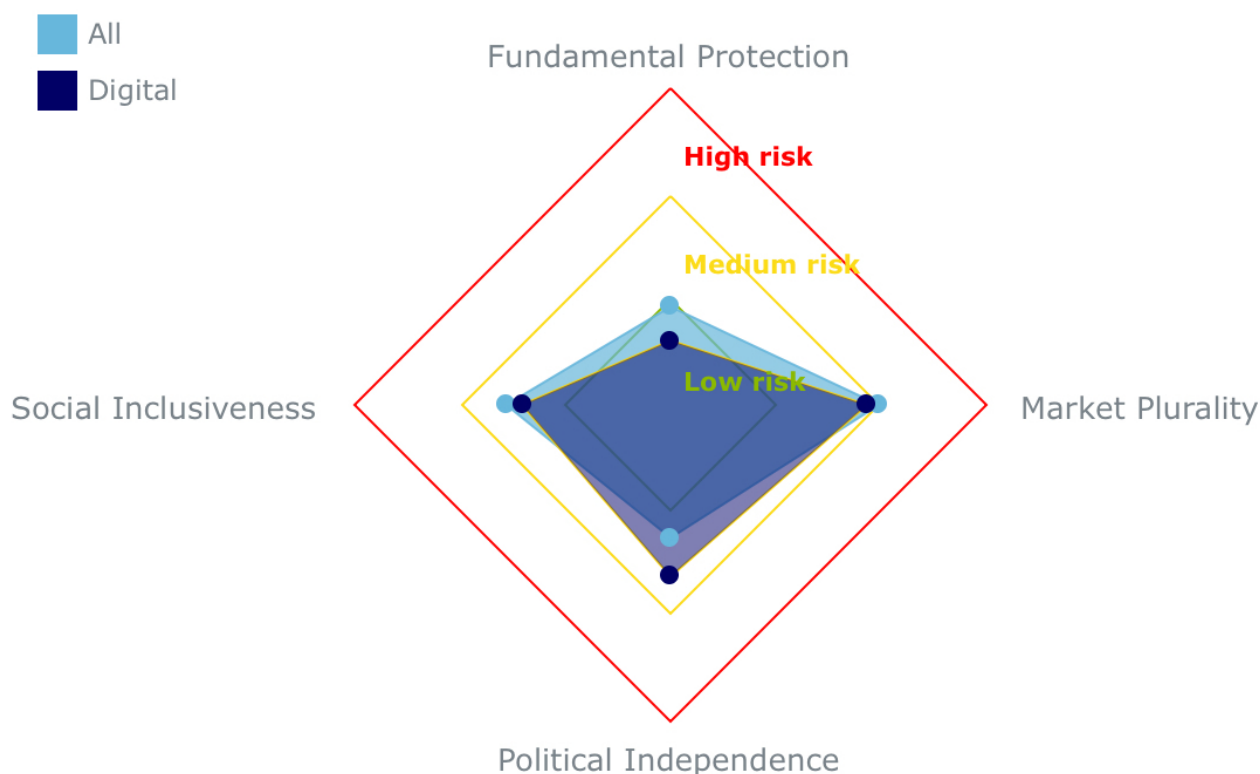
### **Protection against harmful content and hate speech (44%, medium risk)**

To date, there are no legal/policy frameworks aiming at effectively fighting disinformation in Luxembourg. Moreover, there are no fact-checking centers or initiatives stemming from news media. The main reason for that according to the Bee Secure report is that news editors do not have enough funding to hire fact-checker journalists. This is problematic as disinformation is obviously present - and reinforced by the (ab)use of social media - also in Luxembourg. There are some examples of disinformation in the context of COVID-19 mentioned by the report Bee secure 2020 (Bee Secure, 2021). According to Luxembourgish decision makers, the legislation ought to be transnational given the global dimensions of the issue. Luxembourg therefore prefers to wait for a European initiative. The only official guidelines addressing the issue indirectly is the ethical codex issued by the National Press Council which all journalists have to adhere to<sup>[16]</sup>.

With regards to hate speech, the criminal prosecution of "Hate Speech" is regulated in Luxembourg by the Penal Code. These articles represent a restriction of freedom of expression to protect the rights of others. It should also be noted that the media that benefit from temporary subsidy for the promotion of online journalism requires beneficiaries to “implement appropriate measures to combat illegal content in the personal contribution areas of Internet users.” This requirement is also included in the new law regarding the public funding of the journalistic profession that is under review. Notwithstanding the progress made to fight illegal content, Bee Secure observes that the quantity of Hate Speech content is still high, and that its fight still presents some weaknesses. In particular it notes that there are forms of indirect hate speech, corresponding to promoting hate or violence against a group of people with a specific characteristic (religion, age, gender, sexual orientation, etc.) but isn’t considered as illegal by law.

## 4. Pluralism in the online environment: assessment of the risks

### Luxembourg: Media Pluralism Risk Areas - Digital



JS chart by amCharts

#### Media viability

Despite the growing importance of the online news environment, Luxembourg lags behind in quantitative and qualitative research on online news consumption. For instance, no publicly available studies shed light on audience and advertising concentration online, nor are there studies on news consumption online. It can be assumed that the use of digital platforms (Facebook, Twitter etc.) in the consumption of news is considerable but it is impossible to offer a precise analysis of its evolution over the years due to a lack of data.

While the COVID-19 crisis led to a general decrease of advertising revenues according to Nielsen's *Ad'Report*, internet advertising constitutes an exception to the rule as the revenues slightly increased compared to last year (The New Pub, 2020). There are no publicly available data on the amount of ad revenues that went to digital platforms.

The use of paywalls is increasing, especially among digital immigrant media - i.e. media which existed offline before going online. There is no data on the efficiency of this measure. A public support scheme for news media has existed since the 1970s. In January 2017, a transitory regulation offering new subsidies to the online press was introduced in order to promote online journalism. Its aim was to modernize the press subsidies regime to the new development in media consumption and production as well as to assure a more equitable distribution of these subsidies. The transitory law was last renewed on 11th March 2020<sup>[17]</sup>. Each eligible online company receives a total annual amount of 100,000 € paid in three transfers over the year. Ten criteria are listed in the last regulation - including: the publication of at least 2 original articles on average per day; the publication of information of general national and international interest in the political, economic, cultural and social domains; the full-time employment of at least 2 professional

journalists; etc.

### **Media pluralism and concentration**

There are no specific limits on media concentration in Luxembourgish law nor are there provisions in the law governing cross-media ownership. ALIA is the national independent media supervision agency but it has no competence in this matter. The lack of legal means to limit concentration also applies to the advertising market. RTL - which also has a monopoly in the TV sector and which is the dominant player in the radio sector - manages to attract a large audience - and in turn a large amount of advertisers - thanks to its radio and TV productions, the latter being partly funded by state subsidies. Some rival media have complained that these subsidies may cause market distortions.

The Belgian media research centre CIM provides data on Unique User access of the main Luxembourgish media online. According to their data, RTL is calling the shots in the online news sector. Its website RTL.lu is the most popular site in Luxembourg with 186,765 unique views, closely followed by Lessentiel.lu (partly owned by RTL too) with 177,986 unique views. Only then comes Wort.lu with 94,755 unique views and Paperjam.lu with 23,921 unique views.

The PSM Radio 100komma7 also has a presence online but the website needs further improvement. Only three employees are responsible for updating the content and only a tiny fraction of the work produced by the radio contributors is displayed on the homepage in written form. However, the criteria according to which the journalistic contributions or opinion pieces are chosen for homepage display are unclear as they are not specified anywhere. The content seems to be chosen at random. This can also be a potential issue when it comes to diffusing a plurality of opinions in a fair, equal and transparent manner - as it should be the case for a PSM. The articles which are thus showcased and promulgated get a much larger audience than the other news items and opinion pieces since they are used as push content and therefore get a much larger audience. The new pluriannual convention, too, underlines that the PSM should further develop its online offer.

### **Political and commercial independence**

There are only two digital native media in Luxembourg. The first one is a small news outlet in Luxembourgish called moien.lu which is partly owned by the president of the Pirate party Sven Clement. All their articles are written in Luxembourgish. No data exist on the Unique User access of moien.lu. The second one is a young investigative journal called Reporter.lu, which has provided critical and independent coverage of the social and political life in Luxembourg targeting both government and opposition parties. Apart from the state aid, Reporter is fully funded by paid subscriptions making them independent from commercial influence. The journalists have uncovered several scandals and their articles are often cited in the other media. Their added value to the Luxembourgish media landscape is unquestionable and the number of subscribers prove that their work is much appreciated among the population of Luxembourg. In February 2021, Reporter announced that its subscriptions have reached a new record with 3,00 paid customers.

Most newspapers have a presence online. Last year, the Lëtzebuerger Journal made headlines when it announced that it would stop its print version. It became the first daily newspaper to abandon its paper format in order to migrate online and thereby save printing costs. Furthermore, the Lëtzebuerger Journal nearly managed to receive an exclusive - and illegal - state aid for the publication of the parliamentary minutes in pdf format. The president of the Luxembourgish Parliament Fernand Etgen, who is also member of the liberal party DP, had struck a secret deal with the Lëtzebuerger Journal that would have granted it an annual amount of 30,000 Euros. When the details of this deal emerged, Etgen was forced to backtrack and cancel the deal.

## **Fundamental protection and social inclusiveness**

To date, there are no legal/policy framework aiming at fighting disinformation in Luxembourg. Very few media produce fact-checking content (such as Faktencheck on RTL) but they do so only sporadically. The main reason for that, according to the Bee secure report, is that news editor do not have enough funding to hire fact-checker journalists. This is problematic as disinformation is obviously present - and reinforced by the (ab)use of social media. Disinformation is mostly spread through social networks such as Facebook, Twitter, Instagram. Some news organizations in Luxembourg had to intervene on their social media sites to delete obvious fake news. In fact, the COVID-19 pandemic has again shown that disinformation can be a serious issue also in Luxembourg. In February 2020, there was a fake push info with the logo of RTL shared on WhatsApp reporting the first national case of COVID-19. In April 2020, another fake info circulated on Facebook announcing the interruptions of containment measures in retirement residences.

Hate Speech content is also a reality on Luxembourgish social networks. Several public and civil society organisations - such as ASTI or the Zentrum für politisch Bildung - are actively monitoring its presence online. In addition, these organisations offer trainings on digital literacy and organise campaigns to deal with issues relating to hate speech and disinformation. Furthermore, online news media which want to receive press aid need to implement various measures (hiding/blocking/deleting content, moderation, etc.) against illegal content.

According to the interviews we realised with several journalists, online harassment of journalists is not common in Luxembourg.

## 5. Conclusions

The conclusion identifies several avenues for improving the national media landscape based on the weaknesses identified in the report.

With regards to **Fundamental Protection**, we invite the authorities:

- To improve the access to information for journalists.
- To improve the governance, resources, and competence of the national authority.

With regards to **Market Plurality**, we invite the authorities:

- To improve transparency of media ownership by centralizing them in an easily accessible format.
- To provide publicly available data on audience and advertising for offline and online media (including online platforms).
- To introduce safeguards aiming at monitoring the increasing influence of the commercial pressure on the media due to the financial crisis of the media sector.

With regards to **Political Independence**, we invite the authorities:

- To pursue the monitoring of representation of political parties during the official campaign in the PSM and RTL and to extend it to the online counterparts and the online platforms.
- To guarantee transparency and accessibility of the spending for political advertising both offline and online.
- To define rules that ensure a fair distribution of indirect state subsidies and their full transparency.

With regards to **Social Inclusiveness**, we invite the authorities:

- To improve the offer and accessibility to linguistic minorities in RTL (television and radio) and in Public service radio (radio 100.7).
- To improve access to media (both offline and online) to people with disabilities.
- To encourage women's access to key positions (both in governance council et executive boards).
- To introduce a multi stakeholder national fact-checking center aiming at identifying disinformation in media and online platforms.

More generally, we underline the necessity to have a multi-stakeholder center that would promote the collaboration and the research to timely respond to the multiple challenges raised by the digital transformation of the media landscape.

## 6. Notes

- [1] Loi du 8 juin 2004 sur la liberté d'expression dans les médias, <http://legilux.public.lu/eli/etat/leg/loi/2004/06/08/n4/jo>
- [2] Loi du 14 septembre 2018 relative à une administration transparente et ouverte, <http://legilux.public.lu/eli/etat/leg/loi/2018/09/14/a883/jo>
- [3] l'indemnité extraordinaire pour les médias dans le cadre de la pandémie de COVID-19, [https://smc.gouvernement.lu/fr/actualites.gouvernement fr actualites toutes\\_actualites communiques 2020 05-mai 07-indemnite-medias.html](https://smc.gouvernement.lu/fr/actualites.gouvernement%20fr%20actualites%20toutes_actualites%20communiques%202005-mai%2007-indemnite-medias.html) and <https://guichet.public.lu/fr/entreprises/sectoriel/medias/indemnite-editeurs-publications-covid.html>
- [4] Loi du 27 juillet 1991 sur les médias électroniques, <http://legilux.public.lu/eli/etat/leg/loi/1991/07/27/n1/jo>
- [5] Source: <https://www.cssf.lu/en/Document/law-of-12-november-2004/>
- [6] Projet de loi portant création de l'établissement public « Média de service public 100,7 » et portant modification de la loi modifiée du 27 juillet 1991 sur les médias électroniques. [https://www.cc.lu/uploads/tx\\_userccavis/5725\\_PL\\_-\\_etablissement\\_public\\_Media\\_de\\_service\\_public\\_100\\_7\\_PL\\_5725CCL\\_RMC.pdf](https://www.cc.lu/uploads/tx_userccavis/5725_PL_-_etablissement_public_Media_de_service_public_100_7_PL_5725CCL_RMC.pdf)
- [7] <https://www.alia.lu/en/legal-framework/national-legislation>
- [8] See Section 1.2 Engagements relatifs au service public luxembourgeois de télévision (p. 4). [https://gouvernement.lu/dam-assets/fr/ministries-administrations/administrations/service-des-medias-et-des-communications-smc/domaines/medias/television/Convention-CLT-UFA-RTLGroup-31\\_03\\_2017.pdf](https://gouvernement.lu/dam-assets/fr/ministries-administrations/administrations/service-des-medias-et-des-communications-smc/domaines/medias/television/Convention-CLT-UFA-RTLGroup-31_03_2017.pdf)
- [9] Loi du 28 juillet 2011 portant: 1. approbation de la Convention relative aux droits des personnes handicapées, faite à New York, le 13 décembre 2006. 2. approbation du Protocole facultatif à la Convention relative aux droits des personnes handicapées relatif au Comité des droits des personnes handicapées, fait à New York, le 13 décembre 2006 3. désignation des mécanismes indépendants de promotion, de protection et de suivi de l'application de la Convention relative aux droits des personnes handicapées. see; <http://legilux.public.lu/eli/etat/leg/loi/2011/07/28/n3/jo>
- [10] Objectif A. 1., Action 1.1. of the Action Plan 2019-2024 see: <https://mfamigr.gouvernement.lu/fr/publications/plan-strategie/handicap.html>
- [11] Projet de loi n°7631 relatif à un régime d'aides en faveur du journalisme professionnel et abrogeant la loi modifiée du 3 août 1998 sur la promotion de la presse écrite (see : <https://www.moi.lu/wp-content/uploads/2021/06/Den-Aktuellen-Text-7631-amendement.pdf>). The proposal has been submitted to the Council of State, which has given a complementary opinion. See the complementary opinion 66.299 from April, 2 2021: <https://conseil-etat.public.lu/fr/avis/2021/Avril2021/02042021/60299.html> After this complementary opinion, the text will return to the Committee for a vote, before being submitted to the plenary session, probably in the next few months.
- [12] Art. 1 from Loi du 3 août 1998 sur la promotion de la presse écrite. <http://legilux.public.lu/eli/etat/leg/loi/1998/08/03/n13/jo>
- [13] <http://legilux.public.lu/eli/etat/leg/loi/2009/02/06/n2/jo>
- [14] Projet de loi n°76311 relatif à un régime d'aides en faveur du journalisme professionnel et abrogeant la loi modifiée du 3 août 1998 sur la promotion de la presse écrite (see : <https://www.moi.lu/wp-content/uploads/2021/06/Den-Aktuellen-Text-7631-amendement.pdf>). The proposal has been submitted to the Council of State, which has given a complementary opinion. See the complementary opinion 66.299 from April, 2 2021: <https://conseil-etat.public.lu/fr/avis/2021/Avril2021/02042021/60299.html> After this complementary opinion, the text



will return to the Committee for a vote, before being submitted to the plenary session, probably in the next few months.

[15] Loi du 3 août 1998 sur la promotion de la presse écrite. See:  
<http://legilux.public.lu/eli/etat/leg/loi/1998/08/03/n13/jo>

[16] <http://journalist.lu/wp-content/uploads/2017/04/codedeontologie1.pdf>

[17] Source: Règlement du Gouvernement en Conseil du 11 mars 2020 concernant le régime de promotion transitoire du journalisme en ligne. <http://legilux.public.lu/eli/etat/leg/rgc/2020/03/11/a176/jo>



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## Annexe I. Country Team

Dr. Raphael Kies has also been part of the Board of governors of the radio 100.7, the only national PSM, since December 2019.

First name	Last name	Position	Institution	MPM2021 CT Leader
<i>Raphael</i>	<i>Kies</i>	<i>Research Scientist</i>	<i>University of Luxembourg</i>	<i>X</i>
<i>Mohamed</i>	<i>Hamdi</i>	<i>External expert</i>	<i>University of Luxembourg</i>	

## Annexe II. Group of Experts

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 composing the MPM2021. Consulting the point of view of recognized experts aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as subjective, and therefore to ensure the accuracy of the final results of the MPM. However, it is important to highlight that the final country report does not necessarily reflects the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

First name	Last name	Position	Institution
<i>Hoffmann</i>	<i>Jean-Paul</i>	<i>Academic</i>	<i>University of Luxembourg</i>
<i>Koedinger</i>	<i>Mike</i>	<i>Chairman of Maison Moderne</i>	<i>Maison Moderne</i>
<i>Hoscheit</i>	<i>Thierry</i>	<i>President of the Board of Directors</i>	<i>Autorité Luxembourgeoise Indépendante de l'Audiovisuel</i>
<i>Luc</i>	<i>Caregari</i>	<i>President</i>	<i>Association Luxembourgeoise des Journalistes professionnel-le-s</i>
<i>Christophe</i>	<i>Goossens</i>	<i>CEO</i>	<i>RTL Lëtzebuerg</i>
<i>Guy</i>	<i>Antony</i>	<i>President</i>	<i>ARA / Graffiti asbl</i>

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