

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 2021

Country report: Denmark

Christiern Santos Rasmussen, European University Institute

Kristian Redhead Ahm, Copenhagen University

Anders Theis Bollmann, Independent Research Consultant

Research Project Report

Issue -

June 2022



TABLE OF CONTENTS

1. About the project	4
1.1. Overview of the Project	4
1.2. Methodological notes	4
2. Introduction	6
3. Results of the data collection: Assessment of the risks to media pluralism	8
3.1. Fundamental Protection (18% - low risk)	10
3.2. Market Plurality (53% - medium risk)	13
3.3. Political Independence (30% - low risk)	16
3.4. Social Inclusiveness (27% - low risk)	19
4. Pluralism in the online environment: assessment of the risks	22
5. Conclusions	27
6. References	30
Annexe I. Country Team	
Annexe II. Group of Experts	

© European University Institute 2022

Chapters © Christiern Santos Rasmussen, Kristian Redhead Ahm, Anders Theis Bollmann, 2022

This work is licensed under the Creative Commons Attribution 4.0 (CC-BY 4.0) International license which governs the terms of access and reuse for this work. If cited or quoted, reference should be made to the full name of the author(s), editor(s), the title, the series and number, the year and the publisher.

Views expressed in this publication reflect the opinion of individual authors and not those of the European University Institute.

Published by

European University Institute (EUI)

Via dei Roccettini 9, I-50014

San Domenico di Fiesole (FI)

Italy

ISBN:978-92-9466-273-6

doi:10.2870/72228



With the support of the Erasmus+ Programme of the European Union. The European Commission supports the EUI through the EU budget. This publication reflects the views only of the author(s) and the Commission cannot be held responsible for any use which may be made of the information contained therein.

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 2021. 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 notes

Authorship and review

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 is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.

In Denmark the CMPF partnered with Christiern Santos Rasmussen (European University Institute), Kristian Redhead Ahm (Copenhagen University), Mr. Anders Theis Bollmann (Independent Research Consultant), 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 Annex 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).

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
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 being intertwined with the traditional media and the 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 and 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, in order 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, MPM2022 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2022, available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

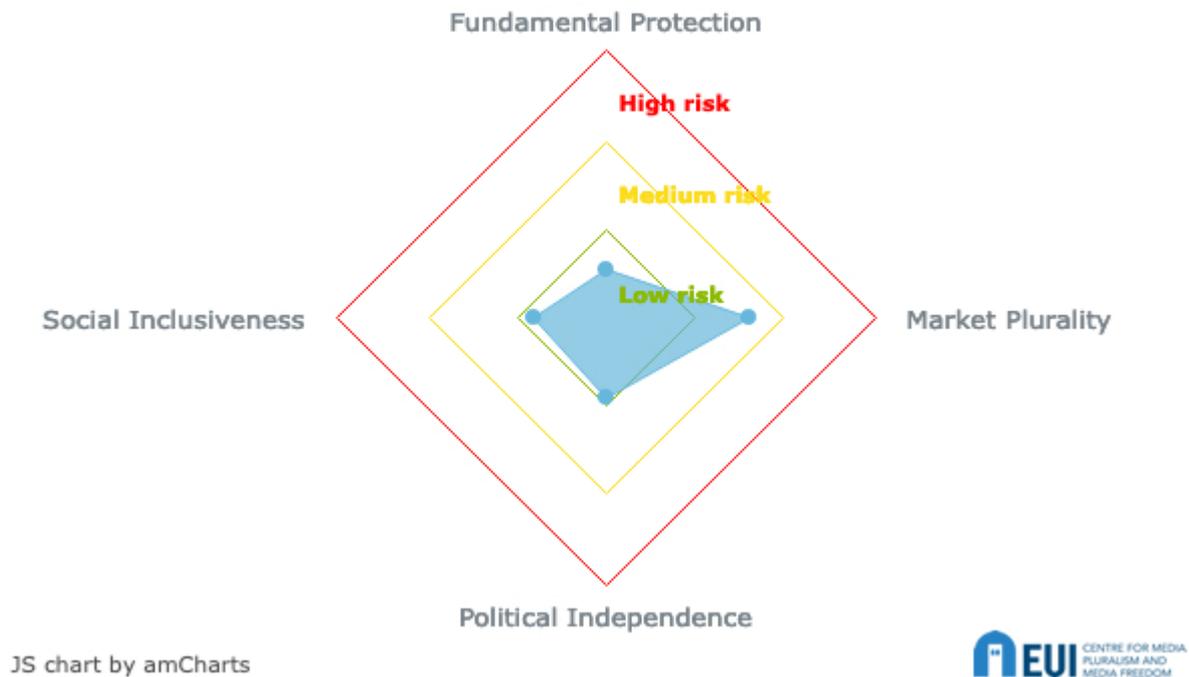
- **Country overview.** Denmark is a small Scandinavian country with around 5.8 million inhabitants covering an area of 42,925 km² (Danmarks Statistik, 2022 [hjemmeside]).
- **Languages.** The official language is Danish which is closely connected to and very similar with Swedish and Norwegian. Within the Kingdom of Denmark, the autonomous regions Greenland (Greenlandic) and the Faroe Island (Faroese) have made their own languages official (Law on Greenlands Autonomy 2009; Law on Fraoese Homerule 1948).
- **Minorities.** Ethnic minorities constitute 14% of the population and Denmark. The largest group is of Turkish origin (more than 60.000 persons) followed by Syrians (more than 40.000 persons) and Iraqis (32.000 persons). Other large groups consist of citizens from Lebanon, Pakistan, Bosnia-Herzegovina, Iran, Somalia, Afghanistan and Vietnam. Denmark is in general a socially and culturally homogeneous society (Danmarks Statistik, 2021 [Rapport: Indvandrerne I Danmark]).
- **Economic situation.** Denmark is a financially strong and stable welfare state based on a progressive tax system and principles of equalization. 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. Denmark's GNP for 2021 was about 334 billion EUR (2.49 trillion kroner). This was a 1,1% increase compared to 2020 (Danmarks Statistik, 2022).
- **Political situation.** A constitutional monarchy, the danish political system is a stable parliamentary multi-party system characterized by minority governments and a strong tradition for political cooperation across the parties. Major labor market issues are handled by tripartite negotiations between the government, employers' associations, and unions.
- **Media market.** Danish media is dominated by private newspapers on the one hand and heavy state involvement in the audio-visual media on the other hand. The media support schemes are comprehensive, both for state media and private media, and is distributed in a fair and transparent way. Denmark has not experienced problems with political affiliated businessowners 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. A main characteristic of the Danish media landscape is the government support for Danish media and cultural production which to a large extent is driven by a political will to support and uphold media in Danish language and media plurality.
 - *Print.* The main newspapers reflect the political spectrum and the country's political history. The print readership has declined, but from a relatively higher level compared to other European countries (Willig, 2010). Most of 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.* Audio-visual media is dominated by the state. Two of the largest tv stations - Danish Broadcasting Corporation (DR) and TV2 - are owned by the state. DR is entirely state funded and is a dominant player in radio and the TV market, as well as on the internet. TV2 is

based on an advertising and subscription business model and known for its network of regional news stations which receive public service funds.

- *Digital*. The number of native digital media is very high and 81% of Danish internet users use the internet to access news online Denmark has seen the emergence of newspapers founded as online only; among other Altinget, Zetland, and Watch Medier. The most important online news sites are DR, TV2 and the big newspapers (Newman et al., 2022).
- **Regulatory environment**. The Danish media environment is guided by self-regulating norms and general laws, with few laws specifically focusing on the media sector. E.g. general laws on defamation and monopoly also covers the media environment. The independent Press Council (Pressenævnet) provides a set of ethical guidelines for members. Though being voluntary, membership is a requirement for most support schemes. Furthermore, Denmark has adopted the EU's Audiovisual & Media Service Directive, to enter into force 1st of July.
- **COVID-19**. The media industry is experiencing major challenges due to terms of lock down in the battle of COVID-19. As businesses close down, so do the budgets for advertising and commercials. Freelancers and the self-employed are severely hit by the COVID-19 crisis. Despite governmental aid packages, 24% fear that the corona crisis will shut down their business. Every fourth freelancer has lost at least 80% of their income and according to the Danish Journalists' Association, the employment of journalists has decreased during the past year.

3. Results of the data collection: Assessment of the risks to media pluralism

Denmark: Media Pluralism Risk Areas



The results show that Denmark poses a low risk to media pluralism and freedom. **Fundamental Protection** (18%), **Political Independence** (30%) and **Social Inclusiveness** (27%) are all placed in the low-risk band. **Market Plurality** (53%) is the only area placed within the medium-risk band.

Fundamental Protection is low-risk as basic freedom of expression and freedom of information is generally respected and incorporated into Danish laws and regulation. The same goes for other relevant variables such as, e.g., net neutrality. Furthermore, neither killings, violence, nor arbitrary arrests were reported in Denmark in 2021. The biggest challenges stem from new online media in regard to legislation as well as some challenges regarding the new law against “spreading foreign influence” as well as the revision of the Danish Public Information Act in 2014 (Koch & Gottrup 2019). However, all in all, fundamental protection is respected in Denmark.

Market Plurality is deemed medium risk with 53%. We expect this is due to the lack of specific regulation against news media concentration, tendency of general laws not mentioning media explicitly though covering them, the large role played by norms and informal rules and lack of laws on editorial independence from market interests. In addition, the dominance of state media (DR and Tv2) is also a factor that contributes to a high market concentration. However, general anti-competition regulation, the CVR-registry and self-regulating bodies like The Press Council keep these developments in check (BEK nr 488, 18/05/2017; LBK nr 1952, 11/10/2021). Denmark has a strong institutional context that ensures market plurality due to its general laws on competition. Furthermore, while the pandemic did hurt Danish media, government packages have been able to prevent closures. Moreover, due to lack of updated and public data on competition among e.g. audio or print press, we do not have exact measurements on a no. of variables. This is a general tendency within case of the Danish media landscape, which may be driven by a Danish perspective of media not being under threat or in danger, thereby making such investigations less prioritized. Apart from lacking data access to market shares of outlets and dominance of the digital market,

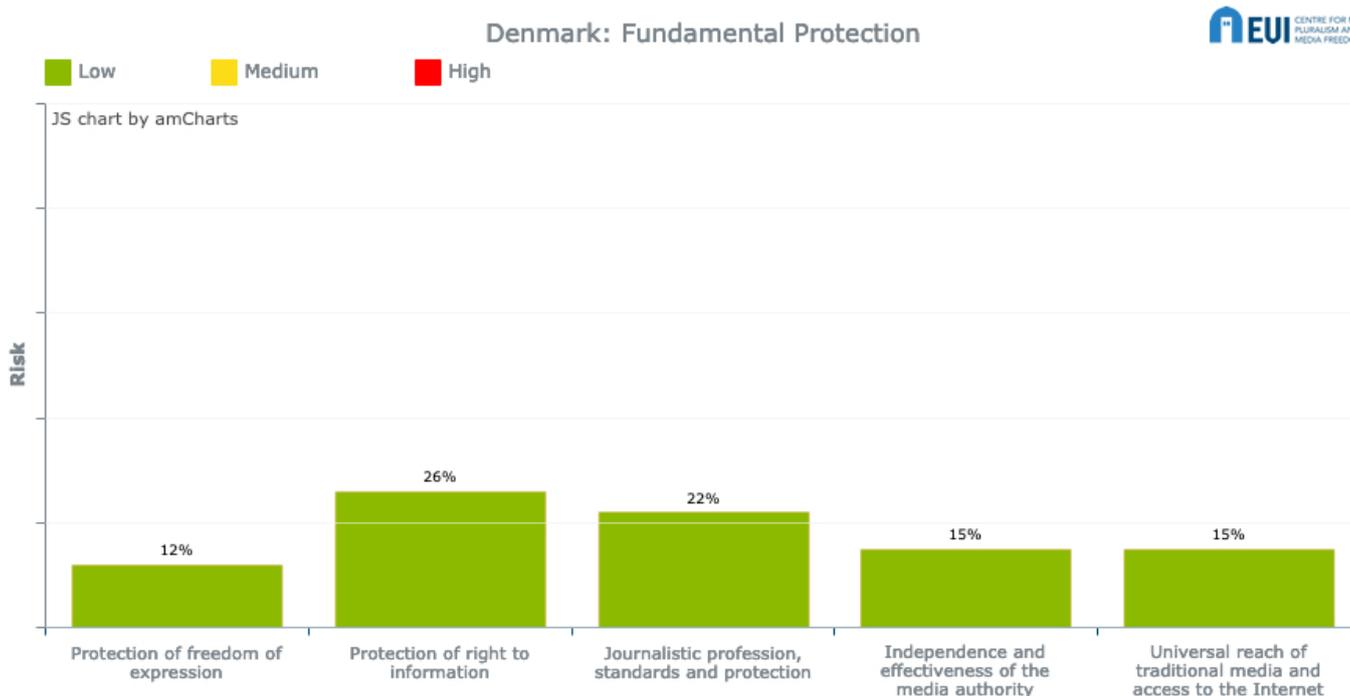
this also goes for data on minorities, effects of defamation lawsuits and transparency of advertisement online. This limits our ability to properly evaluate the condition of the Danish media landscape.

Political Independence is deemed a low risk at 30%, however this may be an overestimation. As political independence of media is mainly guided by democratic culture, norms in media and non-explicit state rules of administration in Denmark, e.g. the principle of arms-length, there is a lack of explicit laws ensuring political independence thereof.

Social Inclusiveness is relatively close to the medium risk band for a number of reasons. The indicators for Access to media for minorities and Access to media for women are in the medium-risk category, with 38% and 45% risk respectively. We noted a lack of research about issues of stereotypical representation, but the quantitative research showed that ethnic minorities and women are vastly underrepresented (Jørndrup, 2017; Jørndrup, 2021). Due to the quantitative orientation of these studies, they are not well-equipped to determine *why* this underrepresentation takes place. It is therefore difficult to determine whether it's a systemic issue. If that were the case, the assessment would change from medium- to high-risk.

3.1. Fundamental Protection (18% - 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 the competence to regulate the media sector, and the reach of traditional media and access to the Internet.



Fundamental Protection of Media Pluralism and Freedom in Denmark is very strong. None of the indicators are near medium risk.

Protection of Freedom of Expression (12%) is protected by article 77 in the Constitution (LOV nr 169, 05/06/1953). Danish criminal law articles 266b and 267 limit this freedom with regard to hate speech, threats, and defamation (LBK nr 976, 17/09/2019). Risks for freedom of expression online are more difficult to pin down in a Danish context. This is mostly due to a lack of data. While online contexts are included in the existing legislation, the legal think tank Justitia released a report in 2020 highlighting problems surrounding somewhat excessive moderation of comments on the Facebook pages of Danish news media (Justitia, 2020: 20). Defamation cases are generally few in Denmark and possible penalties includes fines and in theory imprisonment. Some journalists and experts argue that a challenge exists in regard to defamation lawsuits being used as threats against journalists and media, no empirical data however exists on the matter (Stæhr 2019, Uhre & Poulsen 2021) The general trend however, is that since new defamation law was introduced in 2018 it has become harder to convict and punish people for defamation and that there is fewer cases and less harsh punishments (ibid.). There is a general principle of proportionality in Danish law that is respected in these few cases (Mortensen 2009).

The **Protection of Right to Information (26%)** is not explicitly recognized in the Constitution. However, it is recognized in several national laws, e.g., The Danish Public Administration Act, The Danish Public

Information Act, and the Danish Environment Information Act (LBK nr 988, 09/10/2012; LBK nr 145, 24/02/2020; LBK nr 1036, 18/08/2015). The Danish Public Information Act was revised in 2014. This revision faced heavy criticism for making access to information more difficult by making it easier for the government to reject applications for access to information, thus inhibiting transparency (see Koch & Gottrup 2019). Even though preliminary negotiations have been made regarding loosening the act, no changes have been made as of January 2022. In December 2021, Danish Intelligence Services had contacted Danish media outlets and warned them against possible ramifications for sharing classified information (Albæk, Vibjerg & Pihl 2021). However, whether these warnings will have any practical implications is too early to say. In July 2021, the Danish Parliament adopted the Law on Protection of Whistleblowers (Loven om Beskyttelse af Whistleblowere, 2021) as a transposition of the EU-directive 2019/1937. It requires organizations containing more than 50 persons to have a whistleblower hotline and specific policies to protect whistleblowers, reporting on violations. Though due to the novelty of this law, its effectiveness cannot be measured.

Generally speaking, the **Journalistic Profession** and their **Standards of Protection (22%)** are very good in Denmark. The Press Council (Pressenævnet) is a public, self-regulating organization that handles complaints relating to news media. These mostly relate to the upholding of journalistic ethical principles. As such, it could be argued that The Press Council is more focused on the upholding of professional standards, more than editorial independence (Jørgensen 2019, Pressenævnet 2020). The so-called "Danish model" means that journalists, like most other professions, have strong unions as well as a strong social security net (Dansk Journalist Forbund [n.d.], Jørgensen 2019, Jørgensen 2021). Furthermore, the Danish unemployment rate for journalists is approximately 4.7%. For members of the Danish Journalist and Media Union, the average pay is around 30.000-45.000 KR (ibid.). No data was available on the specific conditions for journalists under COVID-19. However, in general, the Danish State provided "help packages" and other safety nets for both private and public organizations as well as individuals. Digital threats towards journalists are becoming an increasing issue of concern, as shown by a report from the Danish Journalists Union (Andreassen, 2020). There are no reports of journalists being killed, assaulted, or arbitrarily arrested in 2021.

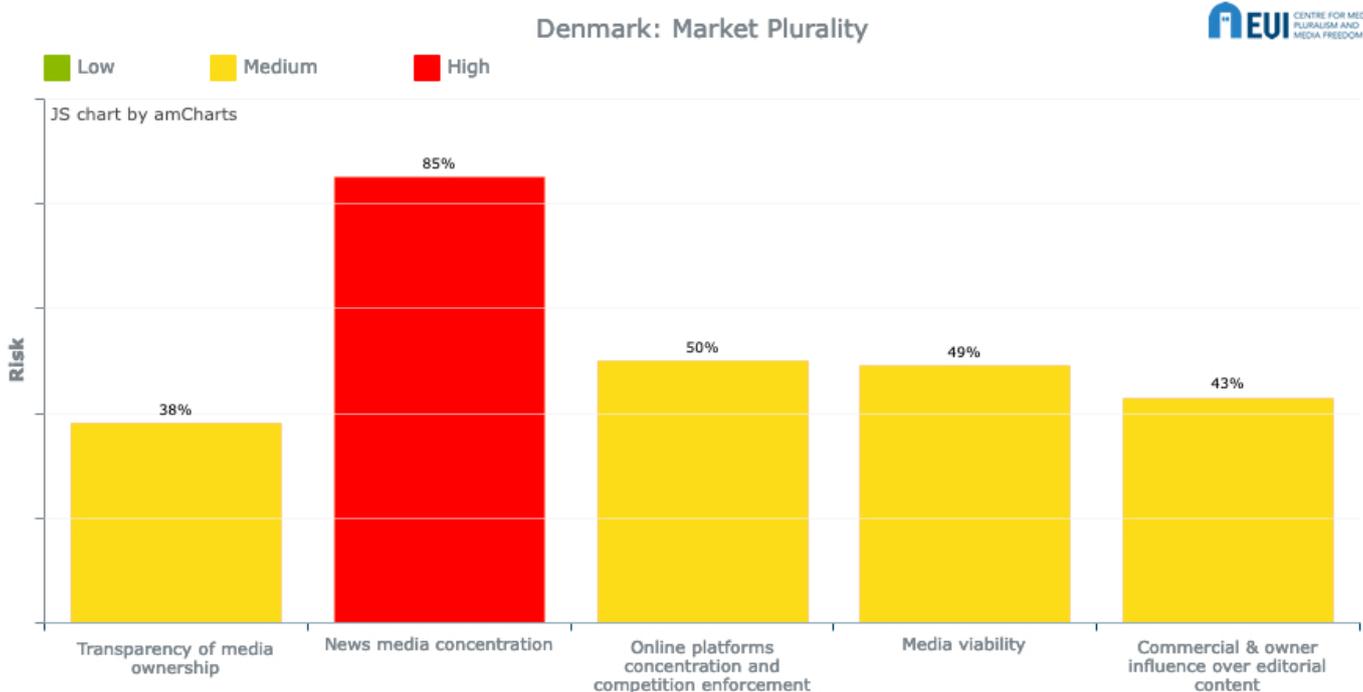
The Independence and effectiveness of Media Authority (15%) has a rather low score due to the strong legal framework surrounding their activities. The three media authorities are The Radio and Television Board, The Media Council, and The Press Council. The authorities' responsibilities, sanctions, and appeals are all explicated and described in law (LBK nr 410, 02/05/2006; LBK nr 914, 11/08/2014; BEK nr 152, 19/02/2014). The Media Council has as its regulatory objective to classify age appropriateness and inform about digital media for children and youngsters. Appointments to the Radio and Television Board cannot be said to be completely free from political influence. The board consists of eleven members, eight of which are appointed by the current Minister of Culture. The remaining three are representatives from interest groups such as unions and accessibility experts (Ministry of Culture, 2021). However, this political influence on the appointment of the board does not make it the puppet for any government. Denmark has a long history of political independence of the media (Blach-Ørsten et al., 2021).

The indicator for **Universal Reach of Traditional Media and Access to the Internet (15%)** is also low risk. Universal coverage of public service media is guaranteed by the Public Service Act (LBK nr 248, 16/03/2019). Because access to Danmarks Radio (DR) is possible through an internet connection, and 99% of homes have access to internet speeds of at least 2Mbit/s (Energistyrelsen, 2019), it seems fair to conclude that both traditional and internet access has universal reach in Denmark. Issues of net neutrality have been investigated by the Danish Energy Board, based on data collected from May 2019 to April 2020.

They conclude that Danish ISPs don't discriminate traffic and that the board will continue these investigations to make sure this stays the case (Danish Energy Board, 2020, Teleindustriens Netneutralitetsforum 2021).

3.2. Market Plurality (53% - medium risk)

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



In general the Market Plurality indicators are challenged by a general lack of updated data for the Danish case and the role that norms and general non-media specific laws play for governing this area. Hence this introduces some bias in the reports estimations.

Transparency of media ownership (38%). The score is likely due to the fact that there are no provisions in Danish law on this. These issues are however covered by general law on legislation on transparency of ownership (BEK nr 488, 18/05/2017). This included the company law (Selvskabsloven) requiring the disclosure actual owners (persons and other entities) with direct and indirect voting power or shares, regularly updating this information (this law is also part of EU law on European companies). Information about company ownership, media or otherwise is publicly available in Denmark. Every business and business owner must register at the Ministry of Trade (Erhvervsministeriet) to get a CVR and tax-system and if in violation of the law will receive fines by the Ministry. This will be public on the website virk.dk. These requirements mean that ownership in Denmark of media companies is completely transparent and very easily accessible to the public.

News Media Concentration (85%) is due to news media consumption being dominated by large state-funded Public Service Media, but mainly driven by this area being largely governed by norms and general laws. While there is no specific regulation on media industry competition, the media are regulated by the same competition laws as any other company (LBK nr 155, 01/03/2018). These laws are mainly based on the EU regulation applicable on the area. The Competition and Consumer authority (under the Ministry of Trade) has an office focusing on fusion of media, sport and entertainment. In addition, it supports the Competition Council that hold the general monitoring and enforcement of the competition legislation. The law on competition gives the Competition Council clear mandate to sanction in forms of fines or actively prohibiting mergers. The law was enforced and the big merger of JP/Politiken and Børsen was abandoned after the Council had expressed concerns with this merger as it made the media market to concentrated (Danish Competition Council, 2017). It is worth noting that in a Danish context, the newspaper market is quite pluralistic, with a variety of major newspapers competing with each other. Television and Radio news is dominated by Public Service Media, Danmarks Radio in particular covering e.g. 75% of all listeners according to the Ministry of Cultures annual report from 2020. It was not possible to find any concrete and updated data on the Danish news media market for 2021, within the timeframe of data collection. Due to lack of updated and public data we cannot measure the market share of top4 audio-visual, newspaper, radio or online news owners or actors for the analysed year.

Online platform concentration and competition enforcement (50%). A recent report made by the Ministry of Culture in collaboration with Kantar Gallup, shows that 45,6% of Danes get their news from social media (Kantar Gallup, 2021). Radio and television still dominate with 48% and 68% respectively (Ibid.), meanwhile reports by Newman et al. (2022) find 81% get their news online (including going directly to media's websites). There is little to no research on the concentration of online platforms, making this indicator difficult to assess. There are no specific mentions of digital media in the law on competition, but it does cover mergers of every business including media and ideally digital. The new law on copyright can be seen as managing competition on digital media, as it gives a better negotiating position for print news media and allows for them to band together against digital media (LOV nr 1121, 04/06/2021). Though lacking data it is likely that the online sphere is heavily dominated by foreign actors and platforms, similar to other countries in Europe.

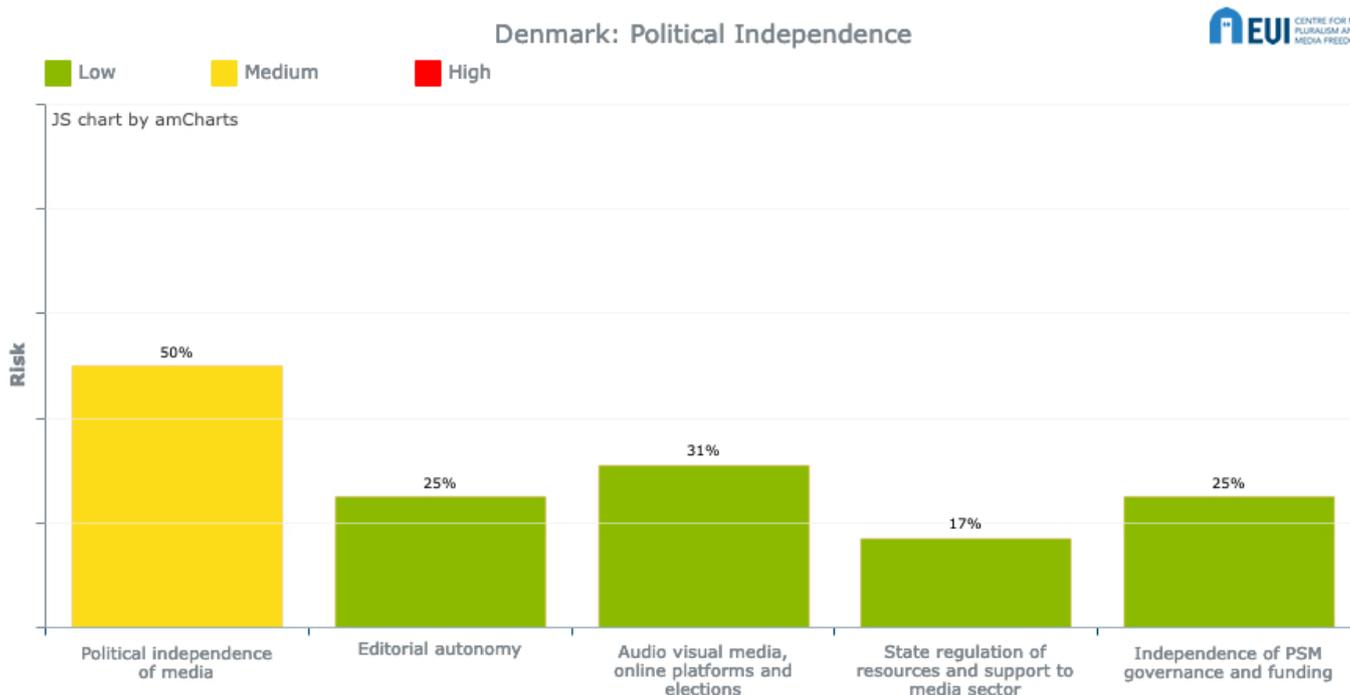
Media Viability (49%) is mainly based on predictions made by the WARC-dataset and the Ministry of Culture's annual report "Omsætning og Beskæftigelse 2021", covering developments the year prior. As these are predictions and as of writing, not updated with official sector specific and aggregated data, the risk assessment of this indicator should not be overstated. While the assessment is unlikely to be middle risk, the Ministry of Culture has highlighted the issue of global digital media and digital platforms taking the lion's share of revenue and not registering their revenue in Denmark. In its 2020 report it conservatively estimates that 33% of the aggregate revenue is absorbed by foreign media companies (including FB and Youtube). Denmark follows the global trend of domestic media being challenged by digital media. However, recent analysis by suggests this may be more nuanced and that Danish media may change the trend, however thorough research is still needed (Journalisten, 2021).

Commercial & Owner influence over editorial content (43%) is also largely governed by norms and self-regulation. The Press Ethical Rules (Presseetiske regler), which are defined by the Danish Union of Journalists, grant journalists' certain freedoms from editorial intervention. These are self-enforced rules overseen by The Press Council, a public, self-regulatory institution that handles cases of journalistic misconduct, suspected censorship and the like. There are problems with this model, however. The Press

Ethical Rules are applicable to all members of The Press Council, but membership is voluntarily and digital native media organisations are therefore not required to register. However, to get access to the State support schemes, membership is a requirement, making it widely accepted. This means that certain newer news websites, that subscribe to extreme left- or right-wing views are free from being sanctioned for their lacking journalistic practices, by relying on advertisement income. Recent research has considered this a major shift in the Danish information landscape, exacerbating future risks for fake news becoming more widespread in society (Blach-Ørsten, Mayerhöffer & Willig, 2021). Following the tradition of unionization of the Danish labour force, the Danish Union of Journalists provides substantial protection for journalists employed by media organizations from un-justified dismissal. However, editors are not covered by these schemes, but negotiate contracts individually with owners of the specific media organization. The Consumer Ombudsman also plays a large role in regulating journalistic practice, primarily with regards to transparent advertising practices. The Danish Marketing Act explicitly states that hidden advertisements are illegal, both on- and offline (LBK nr 1216, 25/09/2013). Recent examples include the major, national newspaper Politiken engaging in link building (paying other sites to share their content) and Altinget failing to disclose a series of talks being a commercial event (Forbrugerombudsmanden, 2020; Mediawatch, 2021). These rulings seek to limit the commercial influence over the editorial content and has recently sparked a debate on the transparency of advertisement payed content.

3.3. Political Independence (30% - 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 the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



Political Independence of Media (50%) has scored a medium risk assessment. This is likely due to the trust and norms-based nature of the Danish media regulatory regime, often not having explicit rules and regulations. There are, however, some recent problematic cases of political influence that are worth mentioning. There is in fact no explicit legislation prohibiting politicians or parties from owning media companies. However, there have been no cases of politicians or parties owning news media to further their own agenda in a closed ecosystem. Major newspapers in Denmark, such as Berlingske and Politiken do inhabit a political standpoint, but they do so without being influenced by political parties to do so. This is mainly due to the history of the press, which began as party-newspapers and then evolved into independent journalism ((Willig, Ørsten, Møller Hartley, & Flensburg, 2015). Recent news sociological studies are beginning to look into the complexities of a news media market that is heavily state funded (Sjøvaag, 2019; Murschetz, 2020). This research interrogates, very broadly speaking, the degrees of influence politics have on news media through their funding. Concerning examples of parliamentary parties exerting influence, it is worth mentioning that the right-wing Danish Peoples Party have had an effect on cutting the funding for Danmarks Radio by 20% and shutting down the PSM station Radio24Syv (Ritzau, 2018; Eller, 2019; Winther, 2019). This has led to an resurgence of the debate on political independence of state-funded media. The shutdown itself resulted in a number of previously Radio24syv affiliated journalists and editors creating their own niche media, often emphasising freedom of the press, e.g. Frihedsbrevet. On the other side of the political spectrum, the Social Democrats, who are currently in government, have been accused

of attempting to influence critical academics and journalists (Holst, 2020; Andersen, 2020), for which they have been publicly criticised. In addition, the new and small digital news media Pio, has been accused of being too influenced by the Social Democrats, as it has close ties to the workers unions 3F and LO, who are historically allies of the party. There is still a very strong culture for freedom of the press and editorial independence, which has existed for many decades (Blach-Ørsten et al., 2021). Still, these cases of political influence should not be overlooked, as they clearly violate these principles. There exists little to no research on the political independence of online media. As was mentioned one paragraph ago, online news media need only adhere to the Press Ethical Rules if they register to The Press Council. But they are not required to do so.

Editorial Autonomy (25%) has a solid footing in Denmark. While editors and editors-in-chiefs' political independence is not protected by law, it would be socially sanctioned if it was violated. The Press Council is the self-regulating body that use their ethical guidelines to handle cases of journalistic misconduct in many forms. It may be argued that a self-regulating body is not a strong enough deterrent for securing editorial autonomy, but this has been the case for many years in Danish news media (Blach-Ørsten et al., 2021).

The indicator for **Audio visual media, online platforms and elections (31%)** has the second-highest rating for this area. The Radio and Television Law explicitly states public service media must uphold freedom of expression and information (LBK nr 248, 16/03/2019: §10). The public service contracts made between the government and Danmarks Radio and TV2 include demands for political impartiality and unbiased news coverage. In the 00's and early 2010's there was a debate on the existence of leftist-bias among the main public service media. As such, there has been a focus of DR to be perceived as fair and balanced - during the European Parliamentary election and the national parliament election, the channel provided multiple programs where all parties (including from the far right) were represented. Whether there is a bias is not clear and most in-depth studies are from 10 years ago. One of the earlier studies found no bias in the 00's on DR (Hopmann et al., 2010; 2012). One project (not academic) by University of Southern Denmark found that what drove party-leaders exposure was news stories and a presidentialization of politics (in which two main candidates for primeminister post is given most attention), i.e. exposure was not driven by political bias (Wallberg, 2019). Political commercials are illegal on flow TV according to §76 of the Radio and Television Law. The law includes all political parties, workers unions, as well as religious and political movements. Online media are exempt from this legislation. This has serious implications, since many Danish politicians from across the political spectrum spent large sums on ads distributed on social media platforms (Kulager, 2020). Sadly, there is still little research or data on questions of transparency in online political contexts. Overall, it must be assumed that no severe wrongdoings are taking place, due to existing strong legislation and culture guaranteeing fair representation of all political parties during election season. However three general laws are relevant to mention in this point. Firstly, in §10 of the Law on advertisement (Markedsføringsloven) requires the advertiser to acquire the consent from the consumer and adverts must be clearly visible as such, which has led to a discussion on the legality of Danish parties use of psychographic advertisement on social media (Ledegaard, Skjerning, Baunkjær & Birk 2019). While the law on Party Accounting (Partiregnskabsloven) and Law on Party Support (Partistøtteleven) requires parties to be transparent on income and expenditure, these only require a yearly overview of the budget, which often leads to digital advertisement being included in general posts of political advertisements and campaigning. Consequently, there are no concrete information on the exact amount used for online advertisement.

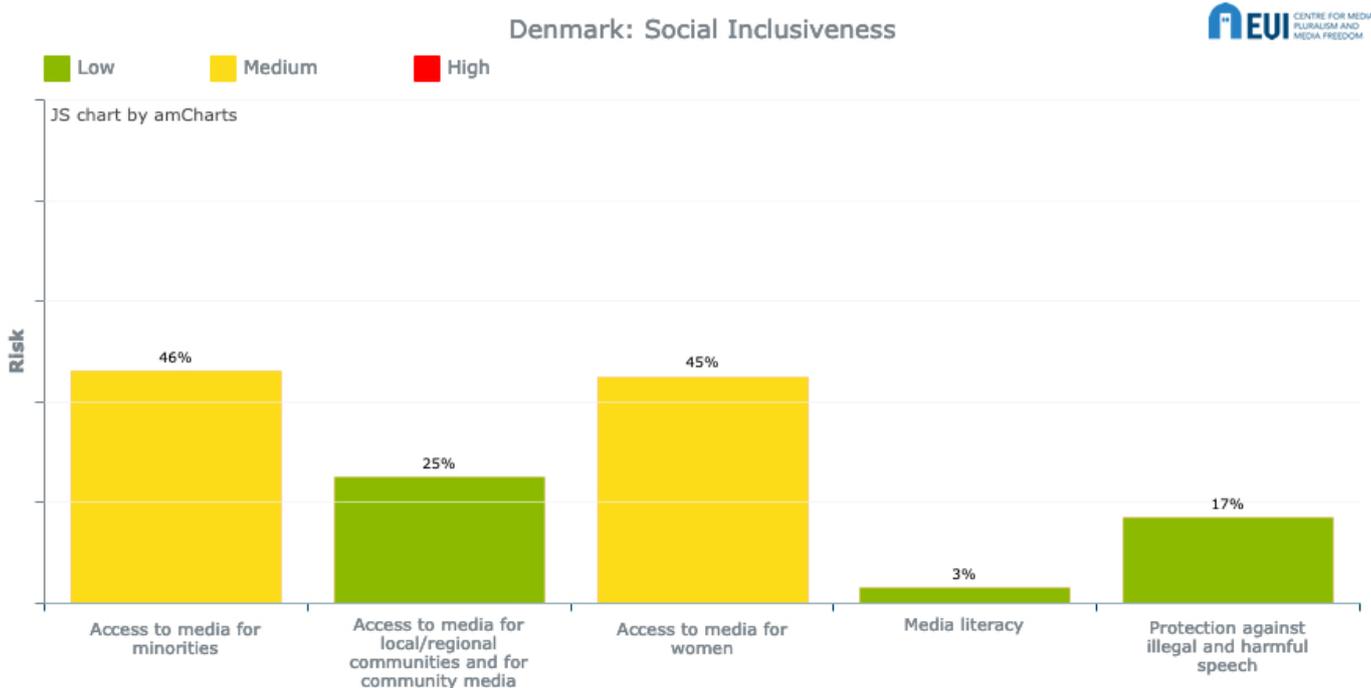
Together with one other indicator, **State regulation of resources and support to media sector (17%)** has the lowest score of all indicators. The Law on Media Subsidies (Mediestøtte) is very thorough and specific in explicating the regulation and accommodation of financial support to media sectors (Lov nr 1604,

26/12/2013). However these are not eligible for media owned in full or partially by the state. The distribution of subsidies is quite clear, fair and can be given to every media organisation, smaller projects and help with liquidity. Practically it is distributed by the Media Council, which presents its work in annual reports on their webpage and also posts guides for applying to it. Given the size of subsidies to TV2 and DR (the two major Danish news media) are so large they dominate the media landscape and can be considered somewhat unbalanced. However, their funding is based on their Public Service Contracts, which are renegotiated every 4 years in parliament, as official government funds for media subsidies are restricted to news organisations that are not owned fully or partially by state institutions or publicly financed companies. State advertising in Denmark is quite limited and mainly used for recruitment purposes. During the Covid-19 pandemic, state advertising was distributed in print, banners, digital and news media. The area is under the competence of the Ombudsman - and the Ombudsman has issued a few decisions regarding the relationship between the media and the state.

Independence of PSM governance and funding (25%) has a quite low risk assessment. The Radio and TV Council procedures on PSM appointments are transparent and independent from political influence. This is all part of the so-called Arm's Length Principle, which is used in the regulation of most Nordic countries (Moe & Mjøs, 2013). Funding of PSM is regulated by the Radio and Television Law and specified in the Public Service Contracts, all of which are publicly available. The state funding of PSM's is a matter of political agreements and is debated in public as well. There have been a few cases of government parties trying to influence the economic future of PSM, as well as the existence of certain PSM radio channels. Historically, DR has been perceived as too left-leaning by right-wing parties in parliament. In 2018, it was decided that DR's budget should be cut by 20% over five years. The right-wing Danish People's Party played a role in this decision being made. The same party, that has never led a government but served as a coalition member, was instrumental in shutting down the PSM radio24syv. While these are not necessarily examples of direct government influence on financing without public discussion (and therefore high risk), they have been highlighted as concerning by media commentators (Ingvorsen, 2018; Lindberg, 2019). Furthermore, Denmark has transposed the Audiovisual and Media Services Directive, which will come into force 1st of July 2022, this will protect consumers against, guarantee independence of national media regulators, combat hatespeech and introduce a guidelines or audiovisual media and technological developments. While the transposition of this directive was announced after this reports data selection period, it is not included in the data set. While it is far to early to evaluate its effectiveness, this may improve the independence of the Radio and TV Council.

3.4. Social Inclusiveness (27% - low 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. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against illegal and harmful speech.



Social Inclusiveness risks primarily revolve around issues regarding representation of minorities and women.

When assessing **Access to media for minorities (46%)**, it is important to make a distinction between ethnic minorities and persons with disabilities. While representation of people with disabilities, as well as accessibility options on PSM are written in public agreements, it is the representation of ethnic minorities that are the reason for the indicator being in the medium risk band. Sadly, there is quite limited research on the subject of ethnic minorities' access to and representation in national media. Two reports from 2012 and 2017 were the only authoritative sources found on the subject (Kontrabande, 2012; Jørndrup, 2017). It is important to keep in mind, that this assessment is based on these potentially obsolete data. In the 2017 report, it is shown that non-western immigrants only make up 4% of news sources, although they make up 12,3% of the population. This is even less than in a similar report from 2012. The 2017 report also notes that minorities are mainly represented in news stories about religion and crime. In PSM there have been several documentaries about minorities, ethnic as well as sexual, but there is little to no research about their quantity and impact. It is striking that public service contracts refrain from specifying the need to be representative of minorities, while they are very clear about accessibility for the disabled.

While there is no legislation on this issue, the Public Service Contract for Danmarks Radio (DR) 2019-2023 explicitly states that the public service broadcaster must focus on handicap sports (p. 4). Furthermore, it states that the broadcaster must be in continuous dialogue with disability organisations in the country to further develop accessibility features (p. 10). Steen Bengtson (Senior Researcher, VIVE) was interviewed to

further contextualize the findings. He agrees that the public service contract is the most explicit policy on this issue, and that there are no explicit laws guaranteeing media access for people with disabilities. He further explains that anti-discrimination laws in Denmark and those passed by the EU further help solidify these rights, although it will first be in the coming years we will actually see if this protection works out in practice.

Access to media for local/regional communities and for community media (25%) has very good conditions in Denmark. It is worth noting that the concept of community media doesn't exist in Danish legislation. Instead, there is a major focus on local/regional media. This can in part be explained by the homogeneity of the population, as well as the small size of the country. The Radio and TV Act clearly states that non-commercial and regional radio and tv-station frequencies are only given to those organizations that apply for them (LBK nr 248, 16/03/2019). This is overseen by The Radio and TV Council (Chapter 2, paragraph 3). The PSM TV2 Danmark has several regional stations that are supported by PSM Funds. Like the national media, these regional media are editorially independent from political influence (Blach-Ørsten et al., 2021). In September 2021, it was decided by the Ministry of Culture that non-commercial and local media should receive additional funding for audiovisual news production, as well as to adapt digital business and distribution models (Ritzau, 2022). There is a political incentive to strengthen local perspectives that go against the national media's primary focus on news from Denmark's largest cities, such as København, Aarhus, Aalborg and Odense. Emphasis in recent subsidy distribution has also been to expand the government fund "Innovationspuljen" and give more access to funding to local and regional organisations. It is worth noting that in the new initiatives to strengthen local and regional media, it has been decided to grow their subsidies at the cost of subsidies originally meant for national media corporations (Ministry of the Interior and Housing, 2021).

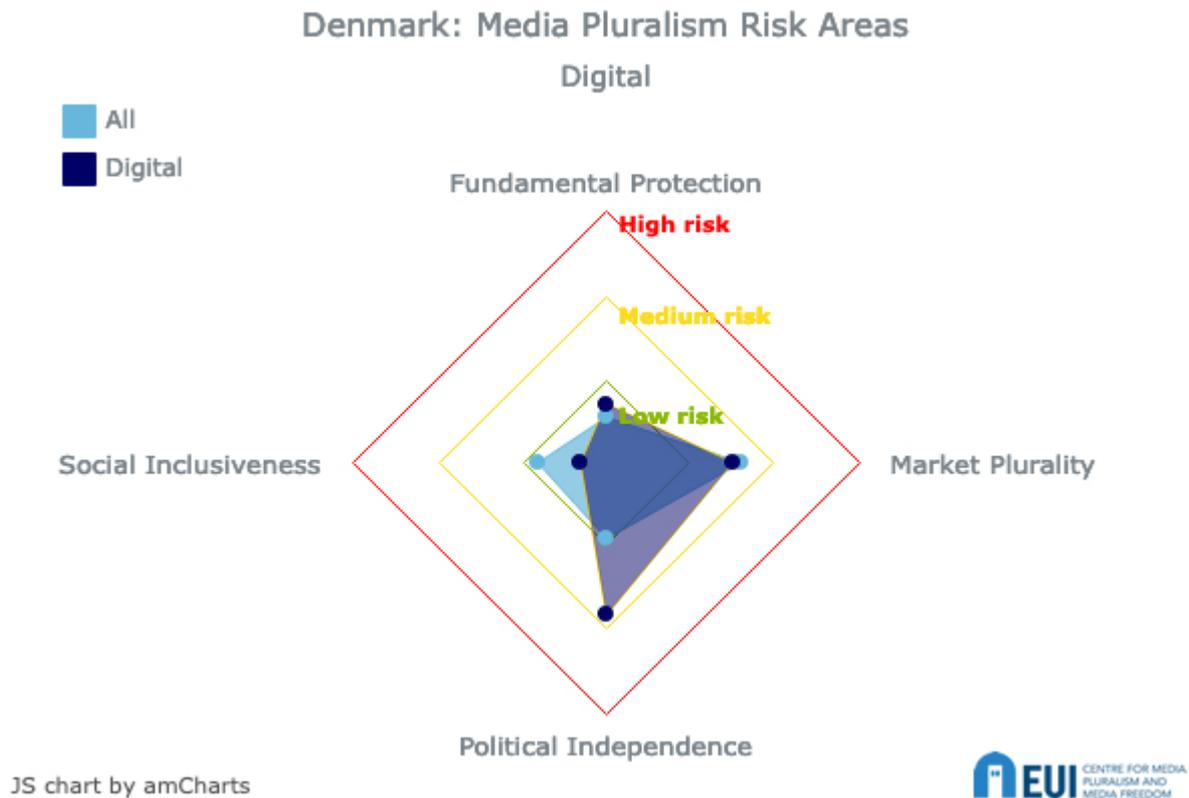
Access to media for women (45%). The primary reason for this score is the lack of female representation in news media. A recent report from the Global Media Monitoring Project, shows that the number of female experts invited by the media have fallen since 2015 (Jørndrup, 2021). In 2015, 38% of expert sources in the media were women. In 2020, that number was 25%. The report cannot decisively identify why this is the case. Jørndrup (2021) writes about how many women are represented in the news media, but doesn't mention anything about issues of stereotypical representation. She does conclude that women are underrepresented in comparison with men, but due to the quantitative orientation of the study it doesn't focus on explaining why this is the case. She argues that the MeToo-movement has been influential in making large media organizations begin critical investigations in their organizational practices, but not about their potential stereotypical representation. Leine, Mikkelsen & Sen (2020) have written about and critiqued the national myth of gender equality in Denmark. Their paper is about violence against women, but make the argument that news media are upholding a myth of total gender equality in Denmark. They do not however, explicitly concern themselves with stereotypes of women in broadcasting. Much like the indicator concerning minorities, the country team has been able to find very little research on the subject.

Media Literacy (3%) is one of the lowest risk indicators in the study. To properly assess this indicator, the country team has found it necessary to translate the concept of Media Literacy to a very, very similar concept primarily used in Denmark, Digital Literacy (Digital Dannelse). A report from 2015 (Stald et al.) tried to contextualize the concept for the Danish educational system. However, the concept of Media Literacy (translated to Mediekundskab, i.e. knowledge of media) never caught on. Instead, the concept of Digital Literacy, which focusses on the competencies of users of digital media, both from a technical and critical perspective, has become a major lightning rod for Danish education and in the rest of Scandinavia (Bundsgaard, 2017; Gran, 2018). It has been operationalized in Denmark by prominent researchers to

discuss issues of digital democracy, cyberbullying, digital pedagogics and citizenship (Mehlsen & Hendricks, 2018; Drotner, 2018; Svendsen & Svendsen, 2021). While there are no explicit policies on digital literacy in the educational curriculum, it is represented in- and outside of formal educational context in a number of ways. It has come to the forefront of political and social life due to high profile cases of underage girls having their pictures shared online without their consent (Ritzau, 2020). Media literacy and information search in general is covered in the the Ministry of Children and Education (Børne og Uddannelses Ministeriet) obligatory guidelines for grammar schools (History) and high-schools (Social Science). Several research projects have focused on how to develop up-to-date curricula for Digital Dannelse/Education in high schools. December 2021, 5 parties from across parliament agreed to spend 52,5mio. kroner (about 7mio EUR) on projects to strengthen digital literacy among children and adolescents (Ministry of Education, 2021). Digital Literacy is still not on the teacher's curriculum, but several NGO's provide educational materials.

A few problems surrounding **Protection against illegal and harmful speech (17%)** have been identified by the country team, specifically surrounding the legal protection of disabled persons. While Denmark has concrete legislation against hate speech in its Penal Code (LBK nr 1650, 17/11/2020: paragraph 266-267), it doesn't explicitly mention online contexts. This makes it very difficult to pursue hate speech uttered on social media. Much to the country teams surprise, it was also observed that people with disabilities are not legally recognized as a group that can be the target of hate speech. This is being amended as of October 2021, when parties from across the political spectrum voted in favor of a bill that will include people with disabilities in the hate speech legislation (Folketinget, 2021). In a report by the Free Speech Commission (which is under the Ministry of Justice), it is recommended not to create legislation that directly targets online contexts, i.e., social media. The reason for this is that it will limit freedom of speech online and because the commission fears that a wave of legislation will make social networking sites introduce content filters that might overreach their purpose (2020: 48). The same report makes an assessment of the threat disinformation poses in a Danish context. While there is a burgeoning field of research on disinformation in Denmark, there is still little data on the scale and impact of disinformation (Mayerhöffer, 2021; Kalsnes, Falasca & Kammer, 2021). The Free Speech Commission (2020) conclude that disinformation currently isn't a cause for concern, since occurrences have been few and institutional safeguards have been ready to combat them (p. 47). They are still concerned for the future, since France and Germany have been shaken more severely by disinformation campaigns.

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



The risk in the online environment for the Danish case are divided in two risk levels. While the two lowest are **Online Fundamental Protection** (23% Risk) and **Online Social Inclusiveness** (10% Risk), the two medium risk area are **Online Market Plurality** (49% Risk) and **Online Political Independence** (60% Risk).

Online Fundamental Protection (23% Low Risk)

Online Fundamental Protection is higher than its offline comparison area, which scores 18%.

Guarantees for FoE online are quite strong. Among the few challenges the biggest come from external actors, e.g., extremism or private online (social) media providers. Another potential challenge stems from a lack of specific laws and regulations concerning the online environment. Yet, in practice, most of the digital environment is also regulated by more general FoE laws and regulations in Danish law. In general, effective remedies exist in the shape of legal action for different sorts of online violations. As noted, there is a challenge with private online media providers, in regards to the lack of transparency regarding their filtering/monitoring/blocking/removing of webpages and other online content and their compliance with Danish law. Furthermore, updates to the Danish Criminal Law (art. 108, 2) penalizes "supporting foreign influence activities" with up to twelve years of prison if conducted during elections, have been criticized since it is not abundantly clear what constitutes supporting foreign influence activities (Justitia 2018). Moreover, a law adopted in April 2020 allows the police to block or close web pages without a court order (Hansen 2020). These webpages, however, have to be deemed fake webpages designed for digital theft, specifically in relation to the COVID-pandemic.

Digital Safety for journalists, there is little data. However, that little data that exists did not show an increase in 2021 (Jørgensen 2021, Henningsen 2021). No data exist on whether female journalists specifically are more exposed to threats than male journalists. However, since the problem, in general, is on the rise, it is fair to acknowledge that there is an increasing problem for female journalists. No killings, arbitrary arrests, or violent attacks against journalists were reported in 2021.

Broadband coverage in Denmark is good (96.4% and 92.5% had a broadband subscription. Internet speed is 49.24 (global rank - 47) (Erhvervstyrelsen 2019). Finally, even though the trend in Denmark has been deregulation of Internet Service providers, the degree of net neutrality is relatively high, and there are, in general, no problems regarding net neutrality. Some internet providers still do not adhere to article 4 of EU Net Neutrality Regulation. Nevertheless, the number has decreased from last year (Teleindustriens Netneutralitetsforum 2021).

Online Market Plurality (49% Medium Risk)

Online Market Plurality scores high similar to its offline comparison, which scores 53%. This (in a Danish context) relatively high risk originates mainly from two sources. Firstly, as general law does not distinguish between off/online there are no specific law on digital/online aspects, but are often covered by general laws of Danish laws and effectively implemented. This also leads to the second challenge that most data-sources do not distinguish between on/offline, creating a lack of specific data.

On the **transparency of digital news ownership**, the same rules and regulations on business transparency apply to owners of digital media etc. as to all other organisations (Selskabsloven 2017). For instance, every company must register at the Ministry of Business to get a CVR and tax address (ibid.). All this information is publicly available at the webpage virk.dk under the Ministry.

Regarding online media concentration, there are no specific regulatory safeguards to avoid concentration in the online media sector, although these are covered by the ordinary Law on Competition. However, these only cover media registered in Denmark, which has led to critique from traditional media, calling for a need to improve their negotiation position with big tech that dominates advertisement (Danske Medier 2021). No specific laws exist with the purpose of preventing a high degree of cross-media concentration of ownership. These questions are regulated through the Law on Competition that is more general in nature. Therefore, these questions are handled by the Competition and Consumers Authority, whose office on Media and Fusions takes are evaluating from a case-to-case basis (Konkurrenceloven 2018, Konkurrencecenter for Medie og Fusioner 2021). The Competition and Consumers Authority also has the authority to give fines and prison on rare occasions (Konkurrenceloven 2018). It has been challenging to assess the cross-media concentration since very little data exists on the subject.

On **Online competition enforcement** about mergers and advertising concentration it can be noted that, there are no specific mentions of digital media in the law on competition, but it does cover the fusion of every business, including Media and (ideally digital). However, the new law on copyright (Kulturministeriet, 2021) can be seen as managing competition on digital media, as it gives a better negotiating position and allows for banding together against digital media. There are no specific laws on the advertisement on digital media. However, the Danish Competition and Consumers Authority (Konkurrence- og Forbrugerstyrelsen) is in charge of the law on Competition (Konkurrenceloven) and has focused on this issue. Yet, no fine has been given to the dominant actors of Google or Facebook. The Competition and Consumer Authorities have

the right to provide penalties and imprisonment. This law is not media-specific but goes for all sectors. However, they have not moved on the domination of the Danish advertisement market, so it's not really effective. The report they commissioned in 2020 showed high market concentration (KPMG, 2020), but the office has taken no additional action. On the 3rd of June, parliament accepted a change in copyright law, introducing new laws on ownership of danish produced content (Markedføringsloven, 2021). The law now allows news media to negotiate financial agreements on sharing content between media and digital intermediaries. The law goes further than EU law in that Danish news media can negotiate as one with digital media. However, it is not fully enacted yet, and Danish media are trying to band together. Denmark has not introduced or scheduled any form of taxation of digital services it seems that Danish politicians and decision-makers are hoping for some form of EU-regulation (Santos Rasmussen, 2019).

Regarding **Online media viability**, suffers from existing data on the revenue of digital native news media being incomplete. However existing data show that over the past year some digital media like Zetland, has seen an increase in revenue due to their new strategy where subscribers set their own fees called 'ambassador campaigns' this led to a three times larger surplus in 2020 than in 2019 (Newman 2021, Mediawatch, 2021). Even though little data exists on the subject there seem to be an ongoing trend that news media in general are generating revenue from alternative sources this include: i) subscriber paying self-defined fees, ii) increase in micro-casting due to new laws on social media, iii) online events during the pandemic (Medietrends 2021). These alternate sources of revenue are also catalyzing the emergence of new micro media due to the cheapness of creating online platforms and e.g., the possibility of small-endorsement from users. e.g. use of Substack or Reveu. This also means that it is becoming easier for Danish journalists to work more independently (ibid.). Finally there is also different public support schemes for online media. Beneficiaries include newer online media like Zetland, Netavisen Pio and Mediawatch (Kulturministeriet, 2021).

Commercial & Owner influence over online editorial content is subjected to the same rules and regulation as offline.

Online Political Independence (58% Medium Risk)

The risk associated to Online Political Independence is medium, but this may be driven by lack of data, a few known outliers and by the role of general laws, that applies in practice for online media. In terms of political control over media outlets, there is no comprehensive study on the political independence of these. While some digital media editorials do have political opinions, these are guaranteed in the Danish constitution, under freedom of the press. The most successful digital media, Zetland, has adopted a code of conduct, in addition to being a member of the Press Council (Zetland 2020). While no organization is forced into the Press Council, it is a requirement for state funding. Following recent years' increase in digital native media, there has been some criticism of new partisan papers, DitOverblik or Pio, whose ties to the Danish People's Party and workers' unions (traditionally an ally of the governing Social Democrats) has been an issue of debate. However, both these are small outlets and do not represent the general picture of Danish Media (Information, 2018 & Berlingske, 2018).

The Effectiveness of journalistic self-regulation in social media is covered by the same rules as non-digital media. Hence the rules from the Press Council, the Consumer Ombudsman, the Law on Media Responsibility and the contracts made with the Danish Union of Journalists are still in effect and provide ample security of native digital media's editorial autonomy.

Rules on political advertising online and on social media, are dominated by general laws that are still in effect on online platforms. The Law on Advertisement (Markedsføringsloven 2022) §6 bans misleading commercials and advertisement and is applicable on online media. Moreover there is a discussion if the use of psychographic advertisements violates GDPR's specifications on consent of gathering personal data (DR, 2019b). The ombudsman has also criticized a major Danish newspaper Politiken, for non-transparent link-building (i.e. paying sites to share their content). But these laws only focus on the advertiser and there is no law specifically regulating online platforms' sale of online advertisement (Reklamebekendtgørelsen §14, 2020).

On the rules of online election campaigns, the two general Laws on Party Accounting & Support (Partiregnskabsloven 2019 & Partistøtteloven 2006) require transparency in the form of donors and expenditures, in theory also including online advertisement. However, the Law on Accounting only asks for a yearly overview, which does not clearly require expenditure on digital advertisement. As such there are no actual laws on online transparency. Meanwhile, we have no data on Big Tech companies' action on online advertisements in Denmark. Denmark heavily relies on the implementation of the EU Commission's Code of Conduct, which has been strongly criticized for lack of proper implementation (Plasilova et al., 2020).

PSM funding for the online PSM mission are covered by the PSM agreements with state-funded media (DR, 2019a), private media and Danish Media have criticized its actual practice. Though there is no law explicitly requiring this, the contract is negotiated with and signed by parties in parliament and the government. Large state media, Danish Broadcasting Company and Tv2, offer online news freely, which private actors have criticized for skewing competition, as private actors rely on paywalls. However, native digital media have access to state funding on equal footing with non-digital media, provided they are members of the Press Council, thereby being subjected to their code of conduct.

Online Social Inclusiveness (10% Low Risk)

Online Social Inclusiveness is more than half of its offline counterpart. This is mainly due to the fact, that these two capture different aspects of risks. While Social Inclusiveness for all media includes representation of minorities and women in media (including online), the Social Inclusiveness Risks Online focuses on challenges and measures specific to online risks.

Online Media Literacy has been heavily prioritized in Danish grammar schools and extends to Digital Education (Digital Dannelse), which focuses on giving children and adolescents the skills to navigate their digital everyday life. Digital Education has come to the forefront of political and social life due to high profile cases of underage girls having their pictures shared online without their consent. There is a thriving environment in civil society focusing on this and partially supported by the government. These include Digital Dannelse, Digital Dialog, Digitale Unge etc. The subject of Digital Education. has also been covered in the Ministry of Children and Education (Børne- og Uddannelsesministeriet) obligatory guidelines for grammar schools (e.g. in History) and high-schools (e.g. in the Social Science program). As a consequence, digital media literacy is quite high in Denmark with above 75% having basic or above average skills.

Disinformation and Harmful Content Online includes protection against such digital issues. While more research is being produced on disinformation and fake news in a Danish context (Kalsnes, Falasca & Kammer, 2021; Mayerhöffer, 2021), there is little research on the scale and impact of disinformation,

especially data on the current post-Covid environment. The most comprehensive recent document on disinformation in the country has been written by the Commission for Freedom of Speech, which is part of the Ministry of Justice (Ytringsfrihedskommissionen Betænkning og Rapport 2020). The Commission concludes that disinformation currently isn't a cause for concern, since occurrences have been few and institutional safeguards have been ready to combat them (p. 47). These institutional safeguards consist of the strong journalistic ethic and standards within the country, high educational levels and general high trust of mainstream media. However, there are still concerned for the future, since France and Germany have been shaken impacted more severely by disinformation, and since recent studies on antivaxx environments have found networks active in Denmark (Santos Rasmussen, Common Consultancy, Analyse & Tal, 2020). Ahead of the 2019 parliamentary election, the Danish parliament passed an amendment to the criminal law, banning citizens from knowingly aiding foreign services to conduct disinformation campaigns and influence public opinion (Straffeloven §108, 2019), however this does not ban unknowing participation, spread of other misinformation and has been criticized for its effectiveness and implementation (Santos Rasmussen, 2019). In terms of harmful content, the parliament recently introduced amendments to the law on marketing, banning the advertisement of harmful or inappropriate content to children (Markedsføringsloven §3 & §11, 2022). This is mainly targeting influencers who targets teens and children and who had advertised for cosmetic surgery, alcohol and other age-in-appropriate content. In terms of hate-speech the Criminal Law §266b bans hate-speech, but there is discussions if this also applies to online media and discourse there or if it is the duty of online platforms to stop publication of these, see (Ytringsfrihedskommissionen, 2020). According to an analysis by the analysis institute (Analyse & Tal, 2021), more than 25,2 % of hateful speech on social media is directed to Muslims. This legislation only covers ethnic, racial and religious minorities and therefore does not protect people with disabilities. Yet, most traditional media and members of the Press Council have strict censorship rules on their online presence, e.g. banning crude and hateful commentary on their posts on social media (Justitia, 2020). However, to fully evaluate the risks from harmful and hateful content online, more studies are required and not just meta-studies as the current one.

5. Conclusions

The Danish case poses a general low risk to media pluralism and freedom. **Fundamental Protection** (18%), **Political Independence** (30%) and **Social Inclusiveness** (27%) are all placed in the low-risk band, while **Market Plurality** (53%) is on a medium-risk band. Regarding risk in the online environment, these are divided between two low risk indicators, **Online Fundamental Protection** (23% Risk) and **Online Social Inclusiveness** (10% Risk), and two medium risk indicators, being **Online Market Plurality** (49% Risk) and **Online Political Independence** (60% Risk).

The Danish case poses a challenge for this report, in two ways. The first is the general lack of actual data on the Danish media landscape, challenges the meta-study approach of this report, as the existing data points that do exist skew the risk assessment's results. This may lead to outliers dominating assessments or general trends not being accounted for in this report. This lack may be a result of media pluralism and freedom being perceived as a non-issue in Denmark, as the country is often being celebrated for its strong media landscape and liberal democratic tradition. Though this can leave the Danish case blind to issues and worrisome trends of media pluralism and freedom, deviations from the strong liberal democratic tradition and norms among media are also likely to be reported on disproportionately. Hence the report's ability for precise estimations remains limited and more data is required.

The second challenge for this report and its methodological underpinnings is to adjust to the role of norms in the Danish case. Denmark is a high-trust society and rules governing Danish media landscape are often informal, norm-based and based on broad general laws. As the CMPF compares multiple European media landscapes, a lack of explicit laws on media and detailed data will be interpreted as a risk. Hence there is a risk of a pessimism bias, especially in areas such as Political Independence and Market Plurality of the Danish case.

Fundamental Protection (18%) is low-risk as basic freedom of expression and freedom of information is generally respected and incorporated into Danish laws and regulation, with recent laws having been added to protect whistleblowers. Journalists enjoy high levels of personal safety and are shielded from state interference. While **Online Fundamental Protection** (23%) is slightly higher than its offline comparison, this is mainly due to the recent attention given to online threats to journalists and the role of large digital media corporations' lack of transparency when filtering or removing online content.

Recommendations

- **Parliament should evaluate the implementation of the Law on Whistleblower Protection.**
- **Both the Culture of Ministry, the Journalist Union or other NGO's should investigate the scope of online threats to journalists and formulate an action plan to tackle these.**
- **Relevant actors (e.g., the Ministry of Culture) should push for clear rules from digital media platforms regarding online content moderation as well as for transparency regarding these platforms' decisions and practice concerning content moderation.**
- **The Journalist Union should investigate the scope of the problem with threats of defamation lawsuits.**

Market Plurality is deemed medium risk with 53 %, mainly due to a lack of specific regulation against news media concentration, tendency of general laws not mentioning media explicitly though covering them, the large role played by norms and informal rules and lack of laws on editorial independence from market interests. **Online Market Plurality** (49%) is also high, but suffers from a lack of data.

Recommendations

- **The State should further address issues with large digital media organisations challenging domestic media viability.**
- **Both state- and civil actors should conduct more research on market plurality, and especially on the distribution of online media concentration.**

Political Independence is deemed a low risk at 30 %, however this may be an overestimation. As the political independence of media is mainly guided by democratic culture, norms in media and non-explicit state rules of administration in Denmark, e.g. the principle of arms-length, there is a lack of explicit laws ensuring political independence thereof. Meanwhile, **Online Political Independence** (60% Risk), is quite high due to lack of specific regulation of online media and platforms.

Recommendations

- **Take measures to strengthen the independence and transparency of the Radio and TV Council.**
- **Increase the transparency of online political advertisement, e.g. by having political parties adopt a code of conduct on transparent expenditure on online political advertisement.**
- **Both state and civilian actors should conduct more research on political independence on online media.**

Social Inclusiveness is relatively close to the medium risk band with 27%. We noted an overall lack of research and especially, lack of qualitative research, regarding the representation of women and minorities. More systematic research is needed to provide a better picture of the inclusion of women and ethnic minorities in the Danish media. The recommendations should be understood in this context.

Recommendations

- **For future PSM-contracts, parties could consider equating the representation of ethnic minorities and women, in the the same way that representation of disabled people are explicitly highlighted in existing contracts.**
- **Both state and civil society organisations are highly encouraged to conduct more research on the issue of social inclusiveness to provide better understanding of the state of this area in Denmark.**

6. References

- Albæk, Mette Mayli, Vibjerg Thomas, Pihl, Morten (2021). "Spiontjenester lægger pres på medier: I kan også blive straffet i lækage-sager", Jyllandsposten, December 13, URL: jyllands-posten.dk/indland/ECE13552780/spiontjenester-laegger-pres-paa-medier-i-kan-ogsaa-blive-straffet-i-laekagesager/
- Berlingske (2018) "*Demokratisk problem når partimedier snylter på uafhængige medier*" 22 August URL: <https://www.berlingske.dk/kronikker/demokratisk-problem-naar-partimedier-snylter-paa-uaehaengige-medier>
- Blach-Ørsten, M, Burkal, R, Mayerhöffer, E & Willig, I 2021, Denmark: High media independence and informal democratic traditions in the newsroom. in J Trappel & T Tomaz (eds), *The Media for Democracy Monitor 2021: How Leading News Media Survive Digital Transformation*. vol. 2, Nordicom, Gothenburg, pp. 147-176.
- Bruun-Hansen, Kerstin (2022). *Erhvervsmand om Olfi-dom: Glædeligt at der er grænser for, hvad man kan tillade sig at skrive*, olfi.dk. URL: <https://journalisten.dk/erhvervsmand-om-olfi-dom-glaedeligt-at-der-er-graenser-for-hvad-man-kan-tillade-sig-at-skrive/>.
- Bundsgaard, P. (2017). *Digital Dannelse*. Aarhus: Aarhus Universitetsforlag.
- Børne- og Uddannelsesministeret, Ministry of Children and Education, (2021) "Læreplaner 2020" URL: <https://www.uvm.dk/gymnasiale-uddannelser/fag-og-laereplaner/laereplaner-2020>
- Danske Medier (2021) "*DANSKE MEDIERS FORSLAG TIL EN NY MEDIEAFTALE*". URL: https://danskemedier.dk/wp-content/uploads/2021/01/Handout_Medieudspil_Danske-Medier.pdf
- DR (2019a). *DR's Public Service Kontrakt for 2019-2023*. URL: https://www.dr.dk/static/documents/2019/02/20/dr_s_public_service-kontrakt_for_2019-2023_e1f07cf2.pdf
- DR (2019b) "*Eksperter: Politikere og partier fører valgkamp med ulovlig data fra Facebook*". URL: <https://www.dr.dk/nyheder/indland/eksperter-politikere-og-partier-foerer-valgkamp-med-ulovlig-data-fra-facebook>
- Drotner, K. (2018). Hvad er digital dannelse og hvordan fremmer skolen den. *Unge Pædagoger Årg, 79*, 6-14.
- Energistyrelsen i.e. Danish Energy Board (2020). "Energistyrelsens tilsyn med EU-forordningen om adgang til det åbne internet", Rapport. URL: ens.dk/sites/ens.dk/files/Tele/nn_rapport_2020.pdf
- Erhvervsministeriet, i.e. Ministry of Business, (2017) "*Selvskabsloven*". URL: <https://www.retsinformation.dk/eli/lta/2017/488>
- Erhvervsministeriet, i.e. Ministry of Business, (2018) "*Konkurrenceloven*" URL: <https://www.retsinformation.dk/eli/lta/2018/155>
- Erhvervsministeriet, i.e. Ministry of Business, (2017) "Lov om markedsføring" URL: <https://www.retsinformation.dk/eli/lta/2017/426>
- Erhvervsstyrelsen (2019) "*Rapport om Udviklingen på detailmarkedet for bredbånd*" URL: https://erhvervsstyrelsen.dk/sites/default/files/2019-07/Rapport_Udviklingen-paa-detailmarkedet-for-bredbaand_Erhvervsstyrelsen2019.pdf
- Folketinget (2021). *B 10 Forslag til folketingsbeslutning om ændring af lovgivning for hadforbrydelser i Danmark (borgerforslag)*. URL: <https://www.ft.dk/samling/20211/beslutningsforslag/b10/beh1/forhandling.htm#speak51>
- Forbrugerombudsmanden, i.e. The Consumer Ombudsman, (2020) "Forbrugerombudsmanden orienterede om forbud mod skjult reklame ved linkbuilding" 10 March, URL: <https://www.forbrugerombudsmanden.dk/fin-d-sager/markedsfoeringsloven/sager-efter-markedsfoeringsloven/skjultreklame/forbrugerombudsmanden-orienterede-om-forbud-mod-skjult-reklame-ved-linkbuilding/>
- Gran, L. (2018). Digital dannelse: en overordnet interkulturell kompetanse: en systematisk litteraturgjennomgang av dannelse i kunnskapssamfunnet. *Norsk pedagogisk tidsskrift*, 102(3), 214-246.
- Hansen, Frederik Marcher (2020). "Corona-hastelov: Politiet kan nu lyn-blokere falske hjemmesider", *version2*. URL: <https://www.version2.dk/artikel/corona-hastelov-politiet-kan-nu-lyn-blokere-falske->

hjemmesider.

Henningsen, Lauritz Hjortekjær. "Flere og flere danske journalister bliver chikaneret", *Politiken*, June 26.

URL: politiken.dk/kultur/medier/art8302255/Flere-og-flere-danske-journalister-bliver-chikaneret

Information (2018) "*Den erklæret uafhængige netavis Pio undlader at oplyse om sponsorater fra LO og 3F*". 5th of June, URL: <https://www.information.dk/indland/2018/06/erklæret-uafhaengige-netavis-pio-undlader-oplyse-sponsorater-lo-3f>

Iva Plasilova et. al. (2020) "*STUDY FOR THE "Assessment of the implementation of the Code of Practice on Disinformation"*" EU DisinfoLab.

Journalisten (2021) "Slut med den falske krisefortælling", 27 June, p. 24-26

URL: <http://viewer.zmags.com/publication/79e43aa3#/79e43aa3/1>

Justitia (2018) "Bemærkninger til udkast til forslag til lov om ændring af straffeloven (ulovlig påvirkningsvirksomhed)". URL: justitia-int.org/wp-content/uploads/2018/10/H%C3%B8ringssvar-til-ulovlig-p%C3%A5virkningsvirksomhed.pdf

Justitia (2020). *Statusrapport: Retssikkerhed*, Copenhagen: Justitia. URL: <http://justitia-int.org/wp-content/uploads/2020/12/Statusrapport-2020.pdf>

Justitsministeriet, Justice Department, (2021) "Straffeloven" URL:

"<https://www.retsinformation.dk/eli/ft/202012L00189>

Jørgensen, Anna Sol (2021). "Se tallene: Her tjener DJ's medlemmer mest og mindst", *journalisten.dk*,

February 23. URL: <https://journalisten.dk/se-tallene-her-tjener-djs-medlemmer-mest-og-mindst/>

Jørgensen, Anna Sol (2021b). "DJ: Drab og stigende antal trusler mod journalister kræver handling", *journalisten.dk*, February 9. URL: journalisten.dk/dj-drab-og-stigende-antal-trusler-mod-journalister-kræver-handling/

Jørgensen, Søren Schultz (2017). "Fagenes Fremtid", *Journalistfagets fremtid Delrapport 2*, Dansk Journalist Forbund. URL: journalistforbundet.dk/sites/default/files/inline-files/Fagenes%20Fremtid%20-%20Journalistfagets%20fremtid.pdf

Jørndrup, H. (2017). "*Dem vi taler om*": *Etniske minoriteter i danske nyhedsmedier*. Foreningen Ansvarlig Presse. URL: http://ansvarligpresse.org/wp-content/uploads/2017/02/AP_Dem-vi-taler-om_2017.pdf

Jørndrup, Hanne. "*Ligestilling i nyhedsmedierne : DEN DANSKE DEL AF UNDERSØGELSEN: WHO MAKES THE NEWS? 2020*". World Association for Christian Communication, 2021. 34 p. URL: https://rucforsk.ruc.dk/ws/portalfiles/portal/78390176/LIGESTILLING_I_MEDIERNE_2020.pdf

Kalsnes, B., Falasca, K., & Kammer, A. (2021). "*Scandinavian political journalism in a time of fake news and disinformation*". In E. Skogerbø, Ø. Ihlen, N. N. Kristensen, & L. Nord (Eds.), *Power, communication, and politics in the Nordic countries* (pp. 283–304). Gothenburg: Nordicom, University of Gothenburg. <https://doi.org/10.48335/9789188855299-14>

Kantar Gallup (2021) "*Index Danmark/Gallup 2. halvår 2020 + 1. halvår 2021 Offentliggjort 15. september 2021*", URL: <https://webtest.kantargallup.dk/storage/reports/September2021/GrzWLFUyCn3zSnuipHEp.pdf>

Kjærulf, Anders (2021). "*Radio24syv-vært lukket ned af twitter*", *prosa*. URL: <https://www.prosa.dk/artikel/radio24syv-vaert-lukket-ned-af-twitter/>.

Koch, Pernille Boye & Gottrup, Rikke (2019). "Reversible Transparency: A Study of the New Danish Access to Information Act", *European Public Law*, 25:2, 205–228. URL: [https://kluwerlawonline.com/journalarticle/European Public Law/25.2/EURO2019014](https://kluwerlawonline.com/journalarticle/European+Public+Law/25.2/EURO2019014)

Konkurrence- of Forbrugerstyrelsen, i.e. Danish Competition Council, (2017) "*JP/Politiken trækker fusion med Børsen tilbage*", 24 January. URL: <https://www.kfst.dk/pressemeddelelser/kfst/2017/20170124-jp-politiken-traekker-fusion-med-boersen-tilbage/>

Konkurrencecenter for Medie og Fusioner (2021) "*Medier og fusioner (MTF)*" URL: <https://www.kfst.dk/konkurrenceforhold/kontakt-et-konkurrencecenter/mtf/>

Kontrabande. (2012). *Nydanskere i nyhedsbilledet*. URL:

http://kontrabande.com/nydanskere_i_nyhedsbilledet.pdf

KPMG, (2020) "Online reklame i Danmark Rapport for Konkurrence- og Forbrugerstyrelsen" URL: <https://www.kfst.dk/media/w2tbmrvk/21040413-online-reklame-i-danmark-kpmg-analyse-final.pdf>

Kulturministeriet, Ministry of Culture (16/03/2019). "Bekendtgørelse af lov om radio- og fjernsynsvirksomhed". URL: <https://www.retsinformation.dk/eli/lta/2019/248>

Kulturministeriet, Ministry of Culture (2021) "OMSÆTNING OG BESKÆFTIGELSE 2021 - I DANSKE MEDIEVIRKSOMHEDER" in "Mediernes Udvikling i Danmark".

URL: https://mediernesudvikling.kum.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2020/Branche/Omsaetning_og_beskaeftigelse/Omsaetning_og_beskaeftigelse_i_danske_medievirksomheder.pdf

Kulturministeriet, Ministry of Culture (28/12/2021). "Lov om ændring af lov om ophavsret".

URL: <https://www.retsinformation.dk/eli/lta/2021/2607>.

Legal Desk (2022). "Hvad er Injurier", February 3. URL: www.legaldesk.dk/artikler/hvad-er-injurier

Leine, M., Mikkelsen, H. H., & Sen, A. (2020). 'Danish women put up with less': Gender equality and the politics of denial in Denmark. *European Journal of Women's Studies*, 27(2), 181-195.

Mayerhöffer, E. (2021). How do Danish right-wing alternative media position themselves against the mainstream? Advancing the study of alternative media structure and content. *Journalism Studies*, 22(2), 119-136.

Mchangama, Jacob, Vinther-Jensen, Eske & Taarnborg, Ronn (2020). "Digital Ytringsfrihed og Sociale Medier", Rapport, Justitia. URL: justitia-int.org/wp-content/uploads/2020/05/Rapport_Digital-ytringsfrihed-og-sociale-medier_31052020.pdf

MediaWatch (2021) "Altinget retter til efter kritik af kommercielle diplomatevents" 30 June, URL: https://mediawatch.dk/Medienyt/Web/article13096698.ece?utm_source=Rss&utm_medium=latest

Mediawatch (2021) "Zetland voksede og landede sit andet overskud i træk i 2020" URL: <https://mediawatch.dk/Medienyt/Web/article12800283.ece>

MedieTrends (2021) "10 tendenser der præger medierne i 2021" URL: <https://www.medietrends.dk/wp-content/uploads/2020/12/MEDIETRENDS-2021-PRINTVENLIG.pdf>

Mehlsen, C., & Hendricks, V. F. (2018). *Hvordan bliver vi digitalt dannede?*. Informations Forlag.

Ministry of Education (2021). *Ny aftale skal styrke børn og unges digitale dannelse*. URL: <https://www.uvm.dk/aktuelt/nyheder/uvm/2021/dec/211206-ny-aftale-skal-styrke-boern-og-unges-digitale-dannelse>

Ministry of Justice. (2020). "Bekendtgørelse af Straffeloven". URL: <https://www.retsinformation.dk/eli/lta/2020/1650>

Ministry of the Interior and Housing (May 2021). *Tættere på - Flere uddannelser og stærke lokalsamfund*. URL: <https://ufm.dk/publikationer/2021/filer/taettere-pa-flere-uddannelser-og-staerke-lokalsamfund.pdf>

Mortensen, Bent Ole Gram (2009). "Om Proportionalitetsprincippet", *Juridiske Emner ved Syddansk Universitet*, pp. 209-223. URL: docplayer.dk/48878209-Om-proportionalitetsprincippet-1.html

Newman, Nic et. al. (2022) "Reuters Institute Digital News Report 2021 10TH EDITION", Reuters Institute, URL: https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-06/Digital_News_Report_2021_FINAL.pdf

Pressenævnet, i.e. Press Council (2020). "Årsberetning 2020". URL: www.pressenaevnet.dk/wp-content/uploads/2021/04/Aarsberetning2020.pdf

Pressenævnet, i.e. Press Council (2021) "Vejledning om god Presseskik" URL: <https://www.pressenaevnet.dk/god-presseskik/>

Ritzau (2020). "Børneporno i Umbrella-sagen er delt igen trods mange domme." URL:

<https://www.berlingske.dk/samfund/boerneporno-i-umbrella-sagen-er-delt-igen-trods-mange-domme>

Ritzau (2022) "*Mere mediestøtte til lokale medier*" URL: https://www.avisen.dk/regeringen-vil-flytte-penge-fra-landsdaekkende-til-l_679235.aspx

Rytter, Jens Elo (2006). *Den Europæiske Menneskerettighedskonvention - og dansk ret* [2nd ed.], Copenhagen: Thomson.

Stald, G., Hjelholt, M., Nielsen, L. (2015) "*Media Literacy i en dansk kontekst*".
URL: https://mediernesudvikling.kum.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2015/Specialrapporter/Media_literacy/PDF-filer_dokumenter/Media_Literacy_rapport_ITU_final.pdf

Straffelovrådet (2017). "*Straffelovrådets betænkning om freds- og æreskrænkelser*", *Betænkning 1563*, Copenhagen: The Danish Ministry of Justice. URL: [bet1563.pdf \(justitsministeriet.dk\)www.justitsministeriet.dk/sites/default/files/media/Pressemeddelelser/pdf/2017/bet1563.pdf](https://www.justitsministeriet.dk/sites/default/files/media/Pressemeddelelser/pdf/2017/bet1563.pdf)

Stæhr, Peter Albeck (2019). "*Udtalelser på Facebook kunne ikke medføre godtgørelse*", February 9.
URL: hsalaw.dk/udtalelser-paa-facebook-gruppe-kunne-ikke-medfoere-godtgoerelse/

Svendsen, A. M., & Svendsen, J. T. (2021) "*Digital directions: Curricular goals relating to digital literacy and digital competences in the Gymnasium (stx) in Denmark*". *Nordic Journal of Digital Literacy*, 16(1), 6-20.

Teleindustrien (2021) "*Oversigt over DNS-blokeringer*" URL: <https://www.teleindu.dk/wp-content/uploads/2021/11/blokeringer-26-november-2021.pdf>.

Teleindustriens Netneutralitetsforum (2021) "*Forslag til dagsorden for møde i samtrafikgruppen*" URL: <https://www.teleindu.dk/wp-content/uploads/2021/05/NEF-Statusrapport-for-2020-endl.pdf>

Teleindustriens Netneutralitetsforum (2021). "*TI's Netneutralitetsforum: Statusrapport for 2020*", Rapport. URL: <https://www.teleindu.dk/wp-content/uploads/2021/05/NEF-Statusrapport-for-2020-endl.pdf>

Uhre, Cecilie, Poulsen, Dan (2020). "*Injuriesager er svære at vinde men truslen bruges, og det virker*", *k-news*, June 24. URL: www.k-news.dk/nyheder/advokat-stort-set-alt-der-finder-frem-til-medierne-vil-tabe-en-sag-om-injurier

United Treaty Body Database (2021). "*Ratification Status for Denmark*".
URL: https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=49&Lang=EN.

Wallberg, Philip (2019). "*Tre computere så al tv i valgkampen og kortlagde partiledernes skærmtid*" Videnskab.dk, 22 Juni. URL: <https://videnskab.dk/forskerzonen/teknologi-innovation/tre-computere-saa-al-tv-i-valgkampen-og-kortlagde-partiledernes-skaermtid>

Willig, Ida & Waltorp, Karen & Hartley, Jannie. (2015). "*Field theory approaches to new media practices: An introduction and some theoretical considerations*". *MedieKultur: Journal of media and communication research*. 31. 1. 10.7146/mediekultur.v31i58.20671.

Ytringsfrihedskommission (2020) "*Ytringsfrihedens rammer og vilkår*", *Betænkning 1573*, Copenhagen: The Danish Ministry of Justice. URL: https://www.justitsministeriet.dk/sites/default/files/media/Pressemeddelelser/pdf/2020/betaenkning_nr_1573_2020_del_1.pdf

Zetland (2021) "*Integritet og Etik på Zetland*" URL: <https://www.zetland.dk/etik>

Zuleta, Lumi, Burkal, Rasmus, et.al (2017). *Hadefulde Ytringer i Den Offentlige Debat*, Copenhagen: Institute for Human Rights. URL: https://menneskeret.dk/sites/menneskeret.dk/files/media/dokumenter/udgivelser/ligebehandling_2017/rapport_hadefulde_ytringer_online_2017.pdf

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 CT Leader
<i>Christiern</i>	<i>Santos Rasmussen</i>	<i>PhD Researcher</i>	<i>European University Institute</i>	X
<i>Kristian</i>	<i>Redhead Ahm</i>	<i>Independent Research Consultant</i>	<i>Copenhagen University</i>	
<i>Anders Theis</i>	<i>Bollmann</i>	<i>Researcher</i>	<i>Independent Research Consultant</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 that make up the MPM2022. Consulting the point of view of recognized experts was aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as being 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 reflect 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>Hans Jørgen</i>	<i>Dybro</i>	<i>Policy Consultant</i>	<i>Dansk Journalistforbund (Danish Union of Journalists)</i>
<i>Thomas</i>	<i>Pallesen</i>	<i>Associate Professor</i>	<i>Danish School of Media and Journalism</i>
<i>Mette</i>	<i>Lundberg</i>	<i>Boardmember</i>	<i>Danish Internet Forum</i>
<i>Stine</i>	<i>Carsten Kendal</i>	<i>Boardmember</i>	<i>Danish Media Association</i>
<i>Maria</i>	<i>Jeppesen</i>	<i>Civil Servant</i>	<i>Ministry of Culture</i>
<i>Martin</i>	<i>Lavesen</i>	<i>Press Council Vice Chair</i>	<i>Press Council</i>

Research Project Report

Issue -

June 2022

doi:10.2870/72228

ISBN:978-92-9466-273-6

QM-08-22-235-EN-N



Publications Office
of the European Union

