

# MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

## APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2022

Country report: The Netherlands

Knut De Swert, University of Amsterdam  
Andreas Schuck, University of Amsterdam  
Mark Boukes, University of Amsterdam  
Nikki Dekker, University of Amsterdam  
Bieke Helwegen, University of Amsterdam

**Research Project Report**

Issue -  
June 2023



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Published by

European University Institute (EUI)

Via dei Roccettini 9, I-50014

San Domenico di Fiesole (FI)

Italy

ISBN:978-92-9466-451-8

doi:10.2870/884842



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 that is 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 that was carried out in 2022. 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 The Netherlands the CMPF partnered with Knut De Swert, Andreas Schuck, Mark Boukes, Nikki Dekker and Bieke Helwegen (University of Amsterdam), 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).

<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 the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate 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 digitally specific risk scores, and the report contains a specific analysis of the risks that 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 the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

## **Methodological Changes**

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. For the MPM 2023, no major changes were made to the questionnaire, except for the Indicators Transparency of Media Ownership, Plurality in Digital Markets and Editorial Independence from Commercial and Owners Influence (Market Plurality area), and Protection Against Disinformation and Hate Speech (Social Inclusiveness area). The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

In the Market Plurality area, the names of three Indicators have changed. The former indicator on "News Media Concentration" is now named "Plurality of Media Providers"; "Online Platforms and Competition Enforcement" has been renamed as "Plurality in Digital Markets"; "Commercial & Owners' Influence Over Editorial Content" has been renamed as "Editorial Independence from Commercial and Owner Influence".

**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 who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2023 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 MPM2023, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

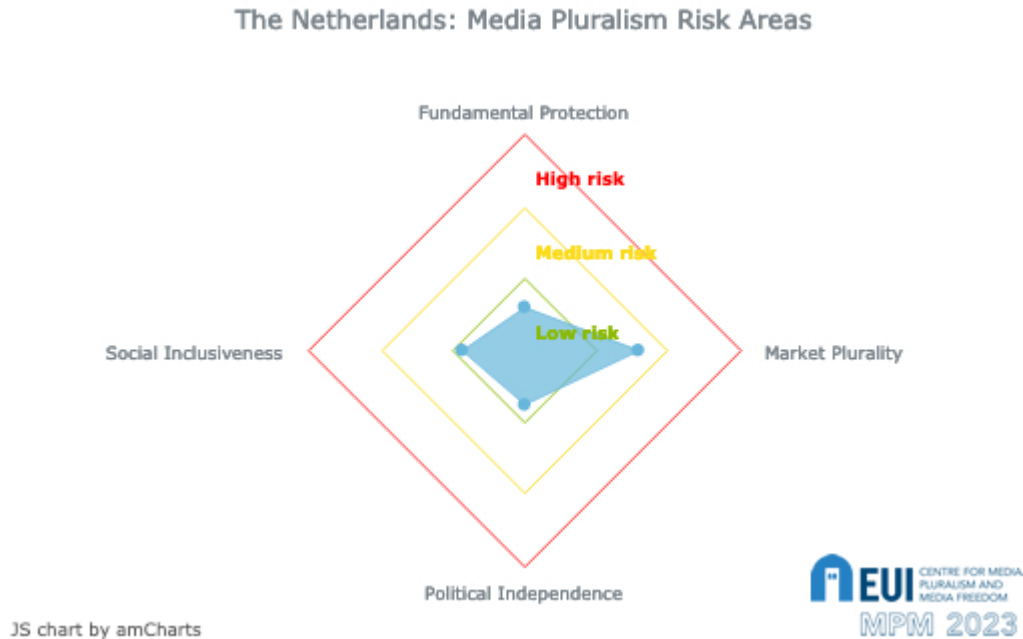
## 2. Introduction

- **Country overview.** The Netherlands is a Western European country with a total of 17,8 million inhabitants (CBS, 2023a). Compared to 2021, the country has become more densely populated, with an average of 523 inhabitants per square kilometer, marking an increase of 1.2 percentage point in a year's time (Rijksoverheid, 2023a).
- **Languages.** The official languages spoken in the Netherlands are Dutch and Frisian.
- **Minorities.** Whereas the only legally recognized minority in the Netherlands are the Frisians, a substantial part of the population has a migration background (CBS, 2023a). Compared to 2021, the Netherlands witnessed a slight increase in people with a migration background (0.6%). In August 2022, 25.2% of the Dutch population could be considered as having either a first-generation or a second-generation migration background. Of the total Dutch population, 10.9% have a Western migration background, and 14.4% have a non-Western migration background. Almost half (45.7%) of people with a migration background are second-generation.
- **Economic situation.** Generally speaking, the Netherlands is a highly prosperous country, ranking sixth on the Prosperity Index Ranking (Legatum Institute, 2022). In 2022, however, the Netherlands was confronted with substantial inflation, with a maximum of 14.5% reached in September (CBS, 2023b). Despite considerable economic challenges, the Netherlands was able to avoid a recession (TradingEconomics, 2023). Overall, the GDP of the Netherlands grew 4.5% in 2022 (CBS, 2023a).
- **Political situation.** The Netherlands is a parliamentary constitutional monarchy. The monarch and the ministers together constitute the government, which is under strict parliamentary supervision. The elections take place on the basis of proportional representation, with a low electoral threshold, leading to a large numbers of (small) parties in the parliament. The cabinet is usually formed by several parties (coalition governments). Every Dutch citizen eligible to vote is allowed, but not obliged, to vote in parliamentary elections. Mark Rutte has led cabinets of varying composition since 2010 (Europa Nu, 2023).
- **Regulatory environment.** The Dutch constitution and the Dutch Media Act both play an important role in the legal guarantee of press freedom and editorial independence. In 2022, several changes have been implemented, among which changes that stimulate transparency within the government, and protection of whistleblowers. All are discussed in the report.
- **Media market.** The Dutch media landscape is highly concentrated. The National Public Broadcasting Service (NPO) is still leading the television market, followed by RTL Nederland and Talpa Networks (Commissariaat voor de Media, 2023). On a positive note, the ACM (the administrative authority overseeing compliance with ownership limitations in the news media sector) decided that the merger between RTL and Talpa – as described in the previous report – cannot take place. For the radio market, the NPO is now the largest supplier. The journalistic sphere is characterized by a strong journalistic culture based on freedom of speech, editorial independence, and self-regulation through journalistic associations and codes of conduct. News consumption is generally high at 82% (Commissariaat voor de Media, 2023). Little more than half of the Dutch citizens (56%) trust the majority of Dutch news providers, which is relatively stable.
- **COVID-19.** With COVID-19 no longer being a substantial issue in 2022, the news consumption boost

that was visible during the years of the pandemic largely stagnated in 2022. News media consumption significantly increased in 2020 and 2021. However, the number of people consuming news generally remained unchanged on all fronts (Commissariaat voor de Media, 2023). Similar stagnation is visible for people paying for online news.

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

In the Netherlands, only one of the four areas scores a medium risk, while the three others are scored a low risk. Generally, little has changed compared to 2021.



**Fundamental Protection** (20%) is scored low risk in the Netherlands, and this risk has been decreasing for the last two years. Freedom of expression is formally protected and is also guaranteed in practice. In 2022, some farmers' protests were contained by police forces, but only when creating a public nuisance. Dutch journalists and news organisations did express some concern about the blocking of Russian news media (also online), as initiated by the European Union. Structurally, there is a strong independent regulatory body in the Netherlands (CvdM), for which procedures have recently been (further) improved. Despite recent legal efforts, the protection of whistleblowers remains problematic in some cases, like in the case of the whistleblower that revealed information about the racism of the Dutch police. Relatively high risks are associated with the physical safety of (especially female) journalists since the Netherlands is confronted with increasing violence against journalists and the economic position of (freelance) journalists.

**Market Plurality** is the area associated with the medium risk (53%). This comparatively high score (compared to the other areas) is not due to problems with editorial independence or media viability. On the latter indicator, there is good progress, with relatively positive economic outcomes. The main risk areas in the Netherlands remain the lack of formal transparency of ownership (both online and offline). Even if in practice, the independent body CvdM does a considerable effort, some information is just not available. Another major issue that remains, is media concentration, with a very limited number of players, and especially on the digital market, the dominance comes from largely uncontrollable international companies. There is no formal legislation to limit media concentration, which is a direction media are driven in due to digital competition. But on the positive side, the independent government body did stop a major merger in the audiovisual sector, after a very long contemplation.

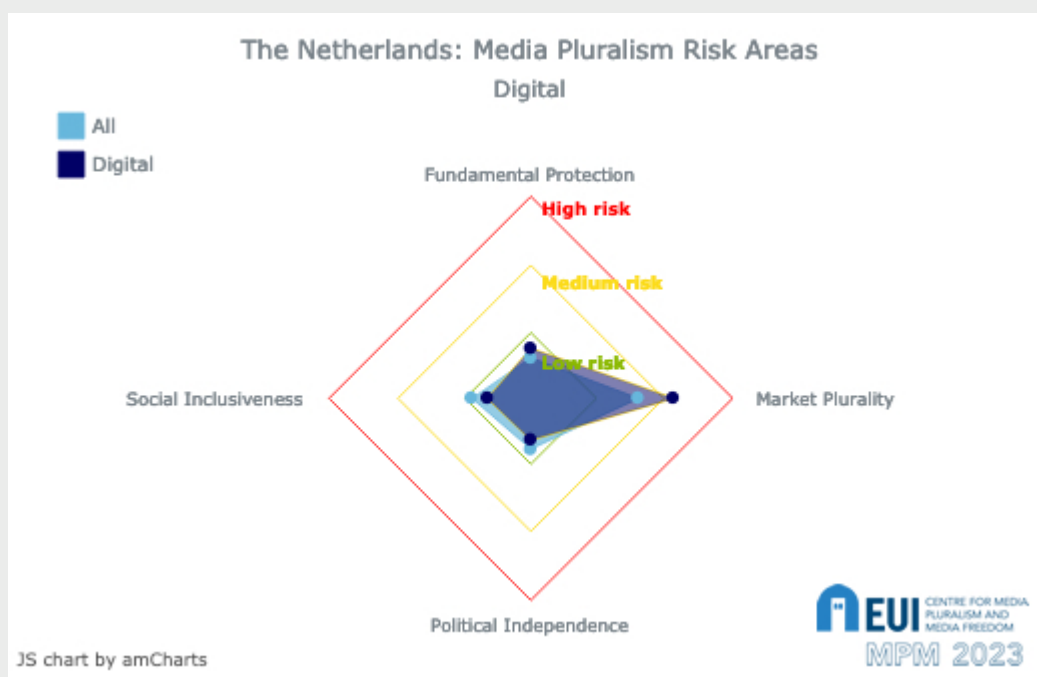
**Political Independence** had an unchanged low risk (25%). The Netherlands does not have a tradition of legal guarantees for the fairness of indirect government subsidies to media outlets or conflicts of interest between media owners and political parties, partisan groups and politicians, but in practice, political influence or pressure is hardly ever observed or even suspected. Political independence of media is largely



guaranteed by the editorial statutes and the monitoring by the independent Media Regulatory Authority (CvdM). In cases in which doubts are raised, serious and transparent investigations follow, along with a public debate, as in the recent case around potentially problematic ties between a former public broadcasting leader and an important government official.

**Social Inclusiveness** remains associated with a low risk (29%). Small improvements are still being made to grant more access and visibility to minorities, and most stakeholders seem to be convinced and willing to keep acting on making more improvements. The Dutch government did well initiating a new initiative against disinformation and hate speech, which should help to keep the relatively high levels of trust Dutch citizens still have in the media.

### Focus on the digital environment

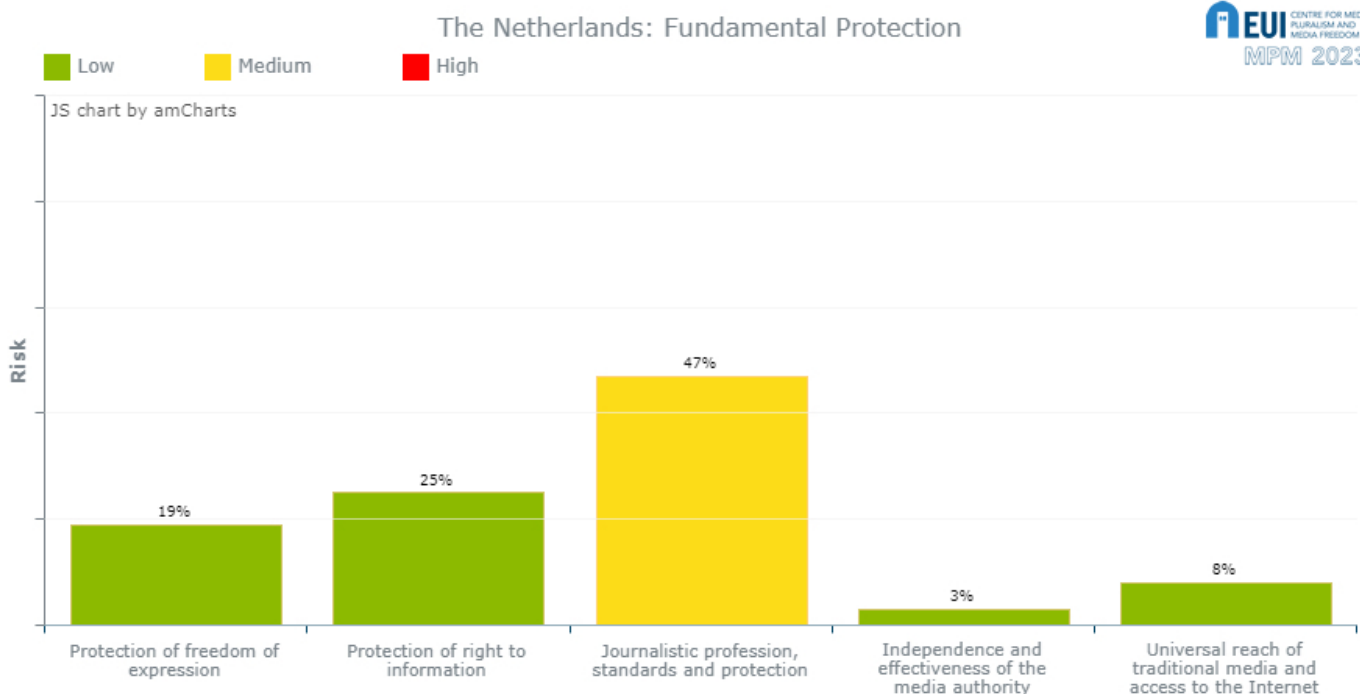


When it comes to the online environment, the risk is generally rather low in the Netherlands, and the main risks are situated in the same areas as the general ones (i.e. a peak in the area of Market Plurality). Exceptions to the generally low risk are the lack of transparency and control over online media ownership. Occasionally, there is some discussion about online removals and blocking, which may sometimes initially come across as arbitrary, but the following societal debates make sure that this is not swept under the rug. Regarding online misinformation and hate speech, the horizon was looking a bit brighter in 2022. There are a lot of fact-checking initiatives, and the Dutch government implemented a new strategy involving a wide range of initiatives aiming to fight disinformation and hate speech involving all stakeholders. Internet reach and digital literacy continue to be high.

### 3.1. Fundamental Protection (20% - 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.

The indicators concerning Fundamental Protection are of high importance to media systems in modern democracies. These indicators cover areas with potential risks to the well-being of the media system, namely the quality of regulatory safeguards for freedom of expression and right to information and the effectiveness and efforts to implement these regulations; the status and protection of journalists and their working conditions; the national regulatory bodies that monitor the media sector and the extent to which these bodies are effective, transparent and independent of economic and political influence; as well as the universal reach of traditional media, broadband coverage and internet access for everyone.



**The Protection of freedom of expression** in the Netherlands has not changed since 2021: there is a low risk regarding this indicator (19%). Freedom of expression is embedded in the Constitution. Moreover, the Netherlands has been and still is a member of several international conventions that protect the freedom of expression. Moreover, the right to protest is protected in the Netherlands, and the police can only end a demonstration when it becomes too dangerous for bystanders or the people involved. On the other hand, penal restrictions on defamation, hate speech or threats (Wetboek van Strafrecht, Art. 261) are also in place, and reputational rights are protected by civil law (Bureau Brandeis, 2021). However, this is no cause for concern since these restrictions are carefully considered case-by-case and do not limit the expression of ideas and opinions. Additionally, the public debate offers the opportunity to reconsider these restrictions and talk about the extent to which some of the assumptions on what is accepted or not are in need of progress and development without this being harmful to the fundamental protection of expressive freedom. The latter is supposedly still more important since it does not often happen that Dutch people are prosecuted for hate speech. In general, defamation has not been decriminalized, which makes it a high risk in the Netherlands. The Dutch penal code states that defamation can be punished by a fine (max. 7800 euros) or up to six

months in prison (Wetboek van Strafrecht, Art. 261, 262, & 266).

**The Protection of the right to information** is a low risk in the Netherlands (25%). There is a legal framework to protect whistleblowers, but this is not always effective. Yet, there are cases in which whistleblowers were unjustly fired, for example a whistleblower that revealed information about the racism of the Dutch police (Haenen, 2022). Since 2020, there is a transition going on from the WOB (Wet Openbaarheid van Bestuur) to the WOO (Wet Open Overheid), which includes various improvements for the access to information. So far, there are no indications that the problems observed in the practical application of the WOB would also occur for the WOO, but it is still (too) early for a real evaluation.

The **Journalistic profession, standards and protections** scored a medium risk (47%) in 2022, which is in line with the risk assessment in the previous years. Journalistic professional associations are effective in guaranteeing editorial independence and respect for professional standards, but in 2022 many journalists were receiving threats on- and offline, mostly during the farmer protests and Sinterklaas. Especially female journalists are at risk of threats, increasingly through digital platforms. Yet, some female journalists feel like these threats are not being taken seriously (Bruin & Bouwmeester, 2022; Trouw, 2022). However, journalists and employers are finally negotiating successfully about working conditions, although job security remains threatened, as still fixed jobs are lost and replaced by flexible jobs and freelance work (NVJ, 2022). Moreover, the protection of journalistic sources is at medium risk since they are protected unless a judge asks for disclosure (Wetboek van Strafrecht, Art. 218a). The Netherlands still does not have a legal framework against strategic lawsuits against public participation (SLAPPs), which is a high risk. In 2022, the government believed that such a framework was not urgent in the Netherlands. However, some experts say that cases with SLAPP characteristics do exist, and anti-SLAPP regulations should be in place (Jurjens, 2022).

**The Independence and effectiveness of the media authority** are evaluated as very low risk (3%) in the Netherlands. The authority lies with the Commissariaat van de Media (CvdM), which is an independent administrative authority that operates transparently, objectively and democratically to minimize the risk of political or economic interference (Parlement.com, z.d.). After some difficulties, the Mediawet has been updated (Mediawet, 2021, Art 7.3 and following) with improved appointment procedures for the CvdM, so that their activities increase in transparency and independence.

**Universal reach of traditional media and access to the Internet** is also at a very low risk (8%), but this has not changed since last year. The whole population has access to radio and television. Net neutrality is well-rooted into legislation (Telecommunication Act, art. 7.4a) and ACM continues to watch over net neutrality in The Netherlands. In 2022, it confirmed that net neutrality regulation does not hinder blocking illegal activities or certain Russian media channels in the framework of international sanctions (ACM, 2022b).

### **Focus on the digital environment**

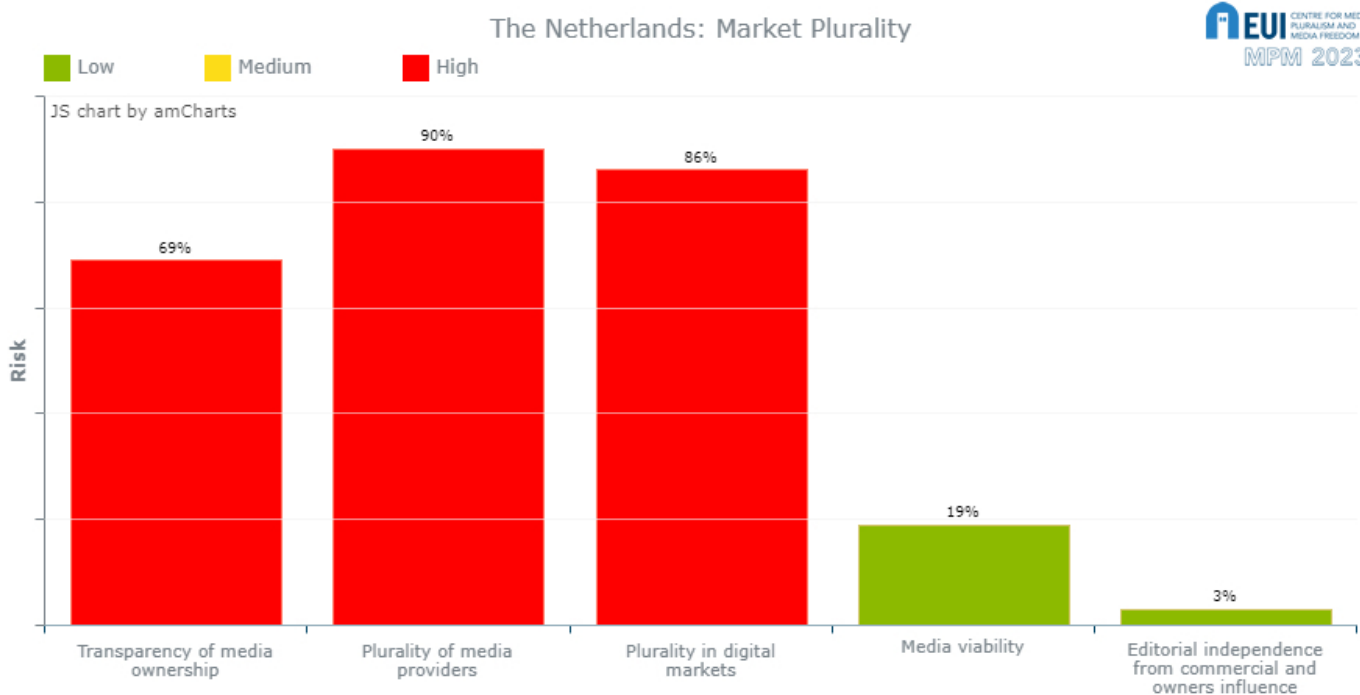
Regarding the regulation of freedom of expression on online platforms, there were no changes in 2022. The same regulations apply to freedom of expression in the online and offline environment. When there is a conflict between freedom of expression and hate speech on a social platform, the standards of the community apply. There is a medium risk regarding the extent to which online

platforms are filtering, blocking or removing online content in an arbitrary way in the Netherlands. Although there is generally no evidence that the Dutch government filters, removes or blocks any online content, an exceptional change in 2022 was that due to the Russo-Ukrainian War, the Autoriteit Consument & Markt (ACM) implemented the blocking of Russian news websites, to prevent Dutch internet users from being exposed to mis- and disinformation. This is part of an initiative by the European Commission to ban Russian media from the EU's market, but many journalistic and news organizations in the Netherlands are worried that this could be a stepping stone to more censorship (NOS, 2022a). Another example is podcast host Jan Roos, who was banned from Twitter due to messages about the Amsterdam Gay Pride (Pauwels, 2022). More importantly, platforms are not fully transparent about the reasons for removing and blocking content. However, there is no risk regarding the access individuals have to legal remedies to address violations of the freedom of expression by social platforms. The risk related to the universal reach and access to the internet is very low in the Netherlands. 99% of Dutch households have access to the internet and are covered by broadband.

### 3.2. Market Plurality (53% - medium risk)

The Market Plurality area considers the economic dimension of media pluralism, assessing the risks deriving from insufficient transparency in media ownership, the concentration of the market in terms of both production and distribution, the sustainability of media content production, and the influence of commercial interests and ownership on editorial content. The actors included in the assessment are media content providers, with indicators including Transparency of media ownership, Plurality of media providers, Media viability, Editorial independence from commercial and ownership influence, and digital intermediaries (with the indicator on Plurality in digital markets).

In the Netherlands, the overall risk for the aspect of *market plurality* (53%) stayed constant at a medium risk level (in 2022, the risk was 54%). Despite this stability, Market Plurality continues to pose the greatest threat to the Dutch media industry, which is largely concentrated in the hands of a small number of proprietors. The country has an independent Media Regulatory Authority (CvdM) to keep an eye on this, but legal tools to enforce ownership transparency and to avoid media concentration, are largely absent. A positive note is that further proposed mergers of media conglomerates are put on hold due to the recommendations of the Dutch Competition Authority. There are still little to no dangers that owners or business interests may directly influence editorial content.



**Transparency of media ownership** is associated with a high risk in the Netherlands (69%). This is largely due to the absence of any national laws that require the disclosure of media organization's ownership. Dutch companies do register some data in the Handelsregister from the Netherlands Chamber of Commerce (KvK, 2023), but this often provides insufficient information about ownership structures. As there is no regulation that sets requirements for disclosure of ownership information in the media sector, there are also no sanctions possible to enforce or encouraged the organizations to be more transparent. However, a media regulatory body (called the "Commissariaat voor de Media," or CvdM) releases a yearly report (the Mediamonitor 2022) on ownership patterns and concentration in the Dutch news media landscape. This is part of its mandate to keep an eye on media concentration in the nation. The CvdM also regulates whether commercial media outlets give the public a minimal amount of information about their organizations in accordance with the Media Act (2008, art. 7.1) (Rijksoverheid, 2018). However, CvdM is also restricted due to the lack of legislation as well as the increasingly fragmented media landscape making that certain parts of

its report are not entirely complete (particularly in the online domain).

**Plurality of media providers** shows a very high risk in the Netherlands (90%). There is consistent and significant danger of ownership concentration in the news media and there is no legislation to prevent this (only for FM radio frequencies). The major players in every market own, respectively, 77% of the TV audience share (top-3: NPO, RTL, Talpa), 74% of the radio audience share (NPO, Talpa, and DPG), and 94% of the newspaper audience share (top-2: DPG and Mediahuis). An important observation is that the top-12 most commonly used online news sites are all owned by the major TV/radio and newspaper corporations. Hence, the same high risks regarding plurality are observed as for the traditional media, because the strong media ownership concentration resonates in the online context with the same players. CvdM and the general "Autoriteit Consument & Market" (i.e., the Dutch Competition Authority, ACM) are responsible for assessing planned media company mergers. Consequently, their reviews adhere to broad guidelines for competitiveness in commercial marketplaces (i.e., not media specific). This year was interesting, because media ownership remained to be concentrated in the hands a few owners. However, two cases prevented a further media ownership concentration. First, the competition authority ACM advised negatively about (and thereby prevented) a potential merger between RTL and Talpa on economic grounds (e.g., expected rise in advertisement tariffs, increased costs for telecommunication distribution companies). The second case is a change in the maximum number of FM-frequencies for radio channels that one owner can possess. This has been reduced from four to three, which means that Talpa will lose at least one radio FM-frequency.

In contrast with the previous indicators, Dutch **media viability** is linked to a low risk (19%): The financial situation of media in the Netherlands has further improved in 2022. In its yearly report, the CvdM reports increased profits for both the newspaper publishers (DPG: +112%; Mediahuis: +14%) and commercial TV (RTL: +84%). Part of this is explained by the advertising revenues that increased across whole Europe after the temporary declines during the Covid-pandemic. Yet, it is important to notice that a large share of this flows to the big-tech companies dominating the online advertising market. The other important stream of revenue, which are user subscriptions, has also grown; especially the number of digital and hybrid subscriptions to newspapers are showing a gradual increase in the past five years. These developments on the revenue side of journalistic organizations have also led to some positive developments for journalists: In 2022, an agreement has been reached about specific labour terms between freelancers and DPG (major newspaper publisher). Moreover, due to a pressing demand for skilled workers on the general labour market, there are sufficient jobs available for media workers and news media are consciously improving the conditions to retain their employees. There are wide diversity of financial subsidy opportunities sponsored by government, moreover, that are managed by the independent Dutch Journalism Fund (Stimuleringsfonds voor de Journalistiek; SvdJ): These are available for all kinds of journalistic initiatives (i.e., national and local; traditional and online media). Despite all these positive trends, warning signals have been expressed about the rising inflation (e.g., paper price, salaries) and the aging of paid news consumers.

In the Netherlands, only a very low risk is attached to **the editorial independence from commercial and owners influence** (3%): Notwithstanding the risks associated with plurality and transparency of ownership, few risks are found for the Dutch media regarding the (direct) influence of commercial interests or owners on editorial content. On an organizational level, the independence of journalists is embedded in strong editorial statutes that the media attach a lot of value to. They guarantee a disconnect between commercial and business interests on the one hand, and editorial content on the other hand, and they are generally accepted as doing this well. Moreover, the media law (Rijksoverheid, 2008: Media Act 2008, Art. 3) clearly prohibits an influence of advertising, sponsoring or product placement on public broadcasters' content.

Commercial outlets are generally following the Code of Conduct as laid out by the Dutch Association of Journalists (NVJ, 2008) to guarantee their independence.

## Focus on the digital environment

**Plurality in digital markets** is also a high risk factor (86%). No specific competition rules exist for the digital media markets. The same generic market regulation applies to the non-digital markets; therefore, it is also the general Dutch Competition Authority (ACM) that is overlooking this. Considering the online advertising market, moreover, the concentration of global big-tech players still increases: from 54% of the online advertising market in 2015 to 77% in 2020 and 80% in 2021 (CvdM, 2022).

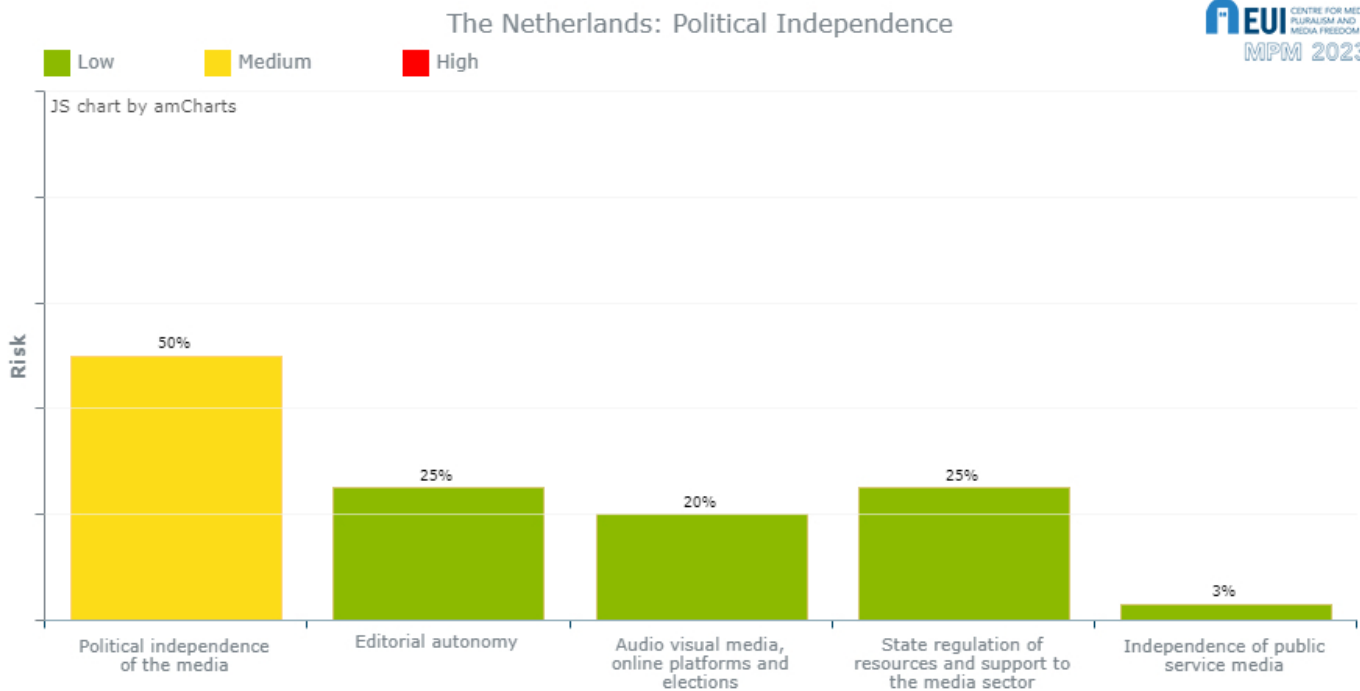
Most findings regarding Market Plurality for the traditional media are convertible to the digital context. After all, few legislation is developed specifically for (news) media but mostly for commercial markets in general (including the digital media market). Moreover, the major players in the regular media (public broadcaster, newspaper publishers, and TV/radio owners) are also the dominant parties in the online context. In terms of digital media concentration, this leads to a similar picture, which involves high concentration and thus high risk. Regarding the transparency of media ownership of digital platforms, most owners are known because they are derivatives of the major regular media. However, the digital context is so fragmented that the independent Media Regulatory Authority (Commissariaat voor de Media, CvdM) can impossibly verify the ownership of all webpages or blogs; therefore, it seems to concentrate on the offline markets, leaving the digital market much harder to assess. The plurality in the digital market can be said to be slightly more diverse, because the most popular news brands are owned by the largest TV organizations (NPO and RTL) and newspaper publishers (DPG and Mediahuis). Consequently, it is a top-4 rather than a top-3 (TV) or top-2 (newspapers) that dominates this market. Content-sharing is increasingly common — sharing news articles from one outlet (e.g., Volkskrant) on the webpage of another outlet (e.g., NU.nl) — which enriches the access of the audience to more news, but also limits the unique profile of news brands.

The digital intermediaries are even harder to evaluate. Although the sanctioning and enforcement powers of the Dutch Competition Authority (ACM) are granted by law and would also apply to the digital market, this institute remains poorly equipped to regulate the digital advertising market because it is highly globalized with most revenues (80%) flowing to big-tech organizations, such as Google and Facebook. Also the CvdM (2022) calls for more international legislation providing them with the necessary information to evaluate the influence of large, international digital platforms. The largest Dutch news media organizations are negotiating with Google about the use of their copy-right protected materials.

Podcasts are increasingly explored in the Dutch market as a way to maintain media viability high. Podcasts initially were free media—created both by established and niche media—that relied on advertising or sponsored messages to generate revenue. In the past year, the Danish corporation Podimo entered the Dutch market and recruited many popular podcasts while also introducing a paid-subscription model. Whereas for the major online media the same (low) risks for editorial independence from commercial and owners influence are perceived as for the regular news media, for podcasts this is somewhat different. Due to its reliance on advertising messages in podcasts that are voiced by the podcast makers themselves (often journalists or opinion leaders), questions have been raised about how this may harm the overall independence of these journalists.

### 3.3. Political Independence (25% - 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.



The indicator **Political independence of the media** scores 50%. There are still no regulatory safeguards that would formally regulate conflicts of interest between owners of media and political parties, partisan groups and politicians. However, in 2022 the Dutch Media Authority (CvdM) started an investigation into the subject, results are still pending. In practice, at this moment, no evidence is found that would show actual political control or a threat to media independence. Political control over the audiovisual media is considered low. Also the main privately held audiovisual media enjoy editorial independence from their owners' influence thanks to their editorial statutes. These are internal agreements which build a protective wall against external influence. There also is no evidence of political control over the radio and also not for newspapers. Here again the strong Dutch practice of editorial statutes prevents owners from influencing news content. With regards to the one existing Dutch news agency ANP (Algemeen Nederlands Persbureau) no regulatory measures to assure independence from political influence are formally in place but in practice there are no indications of problems. Thus, overall the situation regarding the political independence of the media in the Netherlands remains largely unchanged compared to last year. While on the one side there are no formal regulatory safeguards in place, and hence risk assessment overall is not low but on medium level, in practice there is no evidence of interference or conflicts of interests.

The indicator **Editorial autonomy** scores 25%, which indicates a low risk. There are no regulatory safeguards to guarantee autonomy when appointing and dismissing editors-in-chief, however, there is no evidence of political influence. In terms of self-regulatory measures, Dutch journalists adhere to the Code for



Journalists (NVJ, 2021; NVJ, 2022), which states that they should be independent of political influence. The adherence to the code of ethics, as well as the Dutch Media Law is being monitored by the Dutch Media Authority (CvdM) and editorial statutes are in place. More concretely, in July 2022 the Dutch Media Authority (CvdM) started an investigation into possible conflicts of interest and personal and professional relationships between officers holding official functions within Dutch public broadcaster NPO and outside of NPO. This investigation was triggered, among others, by reports about close personal connections between former NPO chair Shula Rijxman and a top official working for the Dutch Ministry for Education, Culture and Science. The fact that the Dutch Media Authority (CvdM) did start an investigation into the political independence of the media shows that self-regulation is in place and being monitored. Given the number of recent high profile cases the situation needs to be monitored closely in the future but a “low” risk assessment is maintained at this moment.

The indicator **Audiovisual media, online platforms and elections** scores 20%, which represents a low risk level. The Dutch Media Act postulates that the public media broadcasters have to be in accordance with public values and the democratic, social and cultural norms of Dutch society and guarantees impartiality in news and access to public service media channels for political actors. Moreover, for example, the public service broadcaster NOS has a journalistic code which specifically includes guidelines and rules regarding impartiality. In 2022 the Dutch Parliament has been discussing the issue of pluralism and impartiality in the Dutch media landscape, and has ordered the Dutch Media Authority (CvdM) to further investigate what more can be done to safeguard it. Regarding the fair representation of political actors and political viewpoints in news and informative programmes and in relation to the Dutch public broadcasting system, the Dutch government installed an advisory board that evaluates the admission (and accountability) criteria for broadcasters. The 'Adviescollege Publieke Omroep' will present the results in the summer of 2023. The fact that the Dutch public *broadcasting* system (NPO) has recently - and repeatedly - fined new broadcaster “Ongehoord Nederland” because it would not operate in line with public values and because it would not show to try and fulfill high professional and journalistic quality standards gives reason to be concerned but also shows that the system itself is functioning and has its own means and procedural standards to tackle problems within it. However, the fact that NPO now repeatedly took action against the same broadcaster because it felt its previous sanction had not sufficient impact shows there is a need to closely monitor the situation in the future.

The indicator **State regulation of resources and support to the media sector** scores 25%, representing a low risk assessment. The rules for spectrum allocation are specified in the Telecommunications Act. In 2022 the government decided, based on the advice of the ACM (the competition watchdog organisation in the Netherlands), to limit the number of licences for commercial companies to maximum three. This ensures more diversity and choices for advertisers, as it avoids dominance of one or two main players in the market. Regarding direct state subsidies most of these come from the Stimuleringsfonds voor de Journalistiek (SVDJ). There is currently no indication that there would have been unfair or insufficiently transparent allocations of means or benefits to media outlets. For example, the SVDJ publishes all its funded projects prominently on its website (SVDJ, 2022).

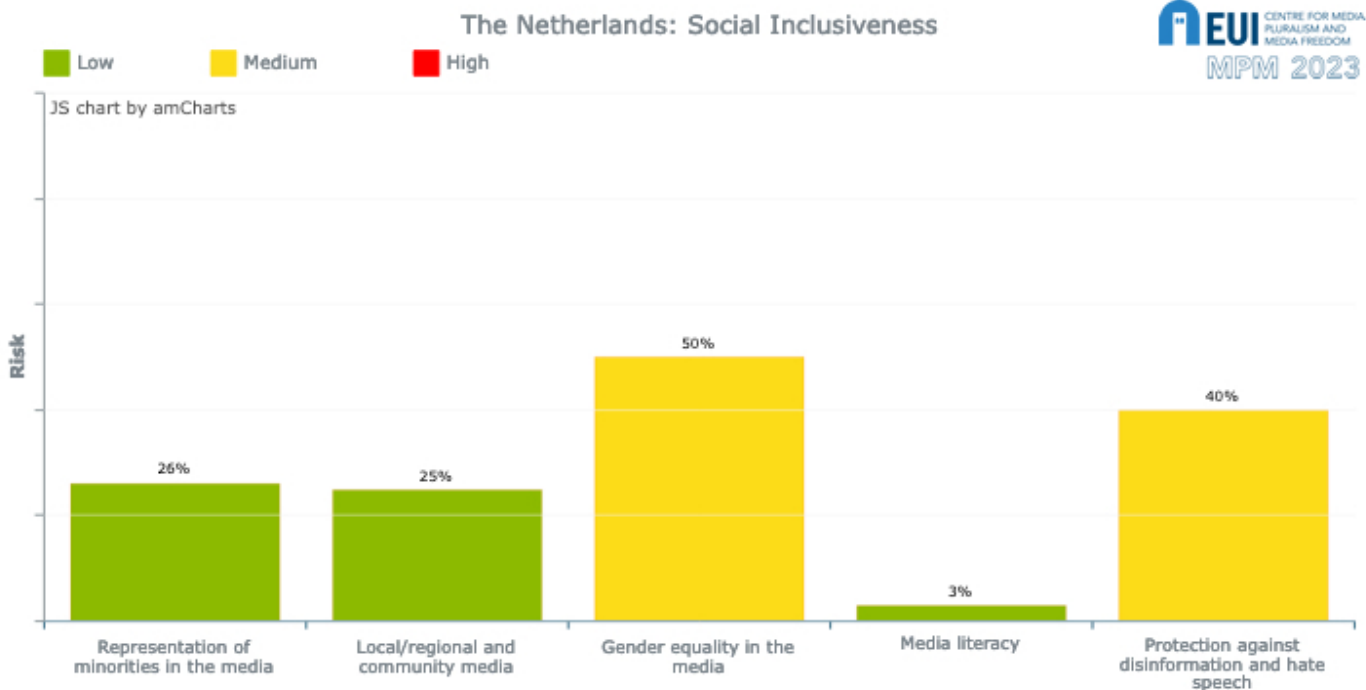
The indicator **Independence of public service media** scores 3%, representing a low risk level. Regarding the risks which stem from appointments procedures for top management positions in the public service media, and the risks arising from funding mechanisms and procedures, there is no evidence of any political interference and no new developments or changes since last year. A sufficiently strong public broadcaster, including a budget that allows for the required (and specific) tasks, are set out in the Dutch Media Law. The process includes five year plans and the budget necessary to fulfill the clearly delineated tasks.

## Focus on the digital environment

Regarding the **Political independence of the media** the risk assessment is low. Prominent online media platforms in the Netherlands are Nu.nl, GeenStijl and Dumpert. Considering the ownership structure of these digital native media no indications of political control are found. Platforms like Nu.nl also have an editorial statute, safeguarding them from owners' influence on the news content. Regarding **Audiovisual media, online platforms and elections** there are no Dutch laws or regulations that aim to ensure equal opportunities and transparency of political advertising in online media during electoral campaign. However, there is a code of conduct for transparency online political advertising. This code of conduct is a guideline for political parties, but not obligated by law. The code states that parties should make clear to the public how much an online ad has cost and who has paid for it. Adhering to this code is voluntary for political parties. Moreover, political parties should not use microtargeting, so that citizens know that they can assume political parties are not targeting them on their personality traits. However, this code is not an obligation, but more of a guideline. Political parties are not actively communicating how much they spend on online advertisements but numbers are communicated by other organizations, such as Google and Facebook. For example, in 2022 they calculated that Dutch political parties collectively spent 1.5 million euros on social media ads. Regarding the **Independence of PSM governance and funding** the Dutch Media Law contains various elements assuring a pluralist media landscape with clear tasks for public broadcasters and funding adequately covers the online public service missions of the PSM without distorting competition with private media actors.

### 3.4. Social Inclusiveness (29% - 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 disinformation and hate speech.



Social Inclusiveness scores a low risk of 29%.

The indicator **Representation of minorities in the media scores** a low risk, with 26%. For the only legally recognized minority in the Netherlands, the Frisians, access to airtime is guaranteed by the Dutch Media Law (Mediawet, 2008, art. 2.61-2.69). The multi-media company Omrop Fryslân provides content in the Frysian language in multiple forms, proportional to the size of the Frysian population (Omrop Fryslan, 2023). Regarding minorities that are not legally recognized in the Netherlands, medium risk is indicated. While considerable efforts have been made to improve the access to airtime, several ethnic minority groups still receive less than proportional access to PSM channel broadcasts. As of January 2021, Omroep Zwart and Ongehoord Nederland are officially recognized as public broadcasters. Both claim to stand up for minorities within the Dutch population. The latter one, however, has continually been criticized for standing up for those who are mostly white and politically right-wing, who are already sufficiently represented by the Dutch PSM. Moreover, in 2021, the NPO announced to start working with a quorum to improve the access for minorities to be in their programs (Villamedia, 2021). Among the Dutch broadcasters, especially the NPO is working on ethnic diversity in their programs. The NPO currently considers the ethnic diversity in their programs as insufficient and unsatisfactory, motivating them to improve their numbers. Besides ethnic minorities, this indicator considers minorities in terms of disability, which is also assessed with medium risk. Over the last decade, the Dutch government planned to make media content more accessible to people with a variety of disabilities in a step-by-step manner (Open Overheid, 2020). While several improvements have been made regarding subtitles, signing, sound descriptions, and audio descriptions, the accessibility has not yet reached a satisfactory level. Soon, we will arrive at the end of the timeline of the plans, while it still requires large efforts to reach an acceptable level of media accessibility for people with a disability. In 2022, the CvdM also made (major) influencers (video uploaders) comply to some rules of accessibility of their

content for people with auditive and visual disabilities (Hayte, 2022).

The indicator **Local/regional and community media** scores a low risk of 25%. Following the updated Media Act in 2020, a policy framework has been implemented which supports local and regional media. This policy framework promotes collaborations between national and regional broadcasters, which should lead to a greater variety of programs in terms of culture, education, and information. Compared to previous years, the subsidies for local media have increased even more (Rijksoverheid, 2022). This trend will continue until at least 2024. Local media now directly receive subsidies from the state. Compared to last year's report, however, we witness a significant increase in risk indication. This can be attributed to the fact that community media are not considered a distinct category alongside commercial and public media in the Netherlands. Community media are, however, present and independent in the media landscape.

The indicator **Gender equality in the media** scores a medium risk of 50%. While gender equality in the media is still not achieved, there have been positive developments over the past year. As of January 2022, the NPO has a quorum for diversity within its staff (Villamedia, 2021). In general, the share of women on PSM management boards has increased significantly to 42%, compared to 33% in 2021 (NPO, 2022). For executive boards, this percentage is significantly lower, at 18% (NOS, 2022; NPO, 2022; NTR, 2022). Among private television companies, gender inequality is significantly more prevalent, as the share of women among members of management and executive boards is 17 and zero, respectively (Wikipedia, 2022). It should be noted, however, that this is still a substantial improvement compared to last year. Regarding the leading news media in the Netherlands, the share of women among editors-in-chief has increased from 38% in 2021 to 53% in 2022 (NOS, 2022; AD, 2022; RTLNieuws, 2022). In terms of media visibility, women are substantially less visible than men. In non-fiction media, three out of ten media personas identify with the female gender (NU.nl, 2022, Commissariaat voor de Media, 2022). While we do see an increase in female experts being invited to informative programs, they are still significantly less visible than male experts (ActiefOnline, 2022). On a positive note, initiatives are taken to improve the situation regarding the representation of women in the media, by raising awareness and facilitating connections between newsmakers and female experts (WomenInc, 2022).

The indicator **Media literacy** scores a very low risk of 3%. The Netherlands is characterized by a strong tradition of policy-making in media literacy. The policy is up-to-date with the latest societal changes, including artificial intelligence, digital resilience, and digital governance (Rijksoverheid, 2021). Media literacy is present in the education curriculum, and currently shows a clear focus on digital media literacy among young citizens (Netwerk Mediawijsheid, 2022). Teachers also receive well-developed and comprehensive training programs in media literacy.

The indicator **Protection against disinformation and hate speech** scores a medium risk of 40%. In December 2022 the Dutch government released a new strategy to effectively combat disinformation. This includes financial support for several initiatives, organizations, and research projects in order to support the strategy's objectives (Rijksoverheid, 2022b). Aside from this governmental initiative, the Netherlands has a substantial amount of independent fact-checking initiatives (Martens, 2021). While the Netherlands has witnessed a substantial increase in disinformation with the advent of COVID-19 (Rijksoverheid, 2022b), the general trust in media is still relatively high, with 75%. Regarding hate speech, the Dutch government is very strict and does not allow any form of hate speech (Dutch Criminal Law, art 137d).

## **Focus on the digital environment**

Focusing on the digital environment, (digital) Media Literacy in the Netherlands is very good, following a strong, long term policy on this. In total, 79% of the Dutch have basic or above basic digital skills. The Dutch government's support for the battle against disinformation, with also a specific focus on the online environment, makes that the topic is high on the agenda of politics, science and society. However, while it is possible to report hate speech to public authorities, for example through the MiND (Meldpunt Internet Discriminatie) initiative, this is not always effective, as it oftentimes triggers discussions about how far freedom of speech can be limited e.g. to counter hate speech.

## 4. Conclusions

Regarding **Fundamental Protection**, the risk slightly decreased, continuing last year's trend. Consisting areas for improvement are the safety of journalists (with increasing violence against them) and the economic position of journalism, and freelancers in particular.

- The Dutch government should still do more efforts to follow and implement European initiatives for Anti-SLAPP legislation, which is currently still lacking in the Netherlands and explicitly not a government priority.
- The Dutch government and media companies should continue and accelerate their efforts to provide an environment in which journalists, especially female journalists, can work without feeling threatened or harassed.
- In practice, whistleblowers are still not always sufficiently protected. The Dutch government should identify the causes for this, and eradicate them, in the spirit of the intended European whistleblower protection.
- The Dutch government, and by extension the European Union initiating this, should be prudent in blocking foreign media content, like they did with Russian media in 2022. Warnings by journalists and media organisations about this should be taken seriously.

**Market Plurality** remains to the area with the highest risk in the Netherlands, and media concentration remains the main concern in this regard.

- Ways should be explored to increase media market transparency, especially in the online environment
- The potential problems related to media concentration should continue to be closely monitored, which needs to inform government decisions about limiting or allowing market developments involving increasing media concentration.
- Local media should continue to be supported, as well as ways could be explored to recognize and support community media.

**Political Independence** is stable in the Netherlands. A risk that is likely to persist, is the lack of regulatory safeguards for political independence in the form of laws and regulations.

- The Dutch lawmakers could investigate the possibility to anchor guarantees of political independence, like codes of conduct and editorial statutes, more solidly in formal rules, which can also be used to properly react on potential future problems, even if no problems seem to exist in practice at the moment.
- Even is this not an easy effort, the Dutch government should do more to map the actual political pluralism in the Dutch media landscape, since good intentions and the lack of clear conflicts of interest do not necessarily guarantee media pluralism in the actual news content.

**Social Inclusiveness** has a low risk in the Netherlands. Media literacy remains very high, and efforts are

done to stimulate access to media for minorities and to improve female presence in the media sector and content. While results are still clearly not satisfactory, generally intentions, both in the public and private sector, seem to be good.

- It could be beneficial for media companies to have more stimuli for social inclusiveness. The Dutch government may do more to monitor and rewards good practices regarding social inclusiveness.
- Presence of women and minority groups in managerial positions in media companies and regulatory bodies should be actively stimulated and ensured.
- Community media should be officially recognized and supported by the Dutch government.

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The authors of the report would like to thank the experts who have provided valuable feedback on a number of questions from the Media Pluralism Monitor. The authors take responsibility for any mistakes made in the report.

## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Knut</i>	<i>De Swert</i>	<i>Assistant Professor for Political Communication and Journalism</i>	<i>University of Amsterdam</i>	X
<i>Andreas</i>	<i>Schuck</i>	<i>Associate Professor of Political Communication &amp; Journalism</i>	<i>University of Amsterdam</i>	X
<i>Mark</i>	<i>Boukes</i>	<i>Associate Professor of Communication Science</i>	<i>University of Amsterdam</i>	
<i>Nikki</i>	<i>Dekker</i>	<i>PhD candidate</i>	<i>University of Amsterdam</i>	
<i>Bieke</i>	<i>Helwegen</i>	<i>Research assistant</i>	<i>University of Amsterdam</i>	

## ANNEXE II. GROUP OF EXPERTS

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

First name	Last name	Position	Institution
<i>Inge</i>	<i>Graef</i>	<i>Associate Professor of Competition Law</i>	<i>Tilburg University</i>
<i>Edmund</i>	<i>Lauf</i>	<i>Project manager</i>	<i>Commissariaat voor de Media</i>
<i>Herman</i>	<i>Wolswinkel</i>	<i>Senior Advisor Public Affairs</i>	<i>NDP Nieuwsmedia</i>
<i>Alyt</i>	<i>Damstra</i>	<i>Research fellow</i>	<i>Scientific Council for Government Policy in the Hague and Amsterdam School of Communication Research, University of Amsterdam</i>
<i>Jo</i>	<i>Bardoel</i>	<i>Professor Emeritus of Journalism and Media</i>	<i>Radboud University Nijmegen</i>

**Research Project Report**

Issue -

June 2023

doi:10.2870/884842

ISBN:978-92-9466-451-8

QM-03-23-256-EN-N



Publications Office  
of the European Union

