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Public Service Media and Platformization: What Role Does EU Regulation Play?

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Abstract: Conceived as institutions funded by the public purse and intended to exist devoid of political influence, the mandate of public service media (PSM) entities is to disseminate reliable news content and high-quality audiovisual productions to all demographic segments, inclusive of marginalized communities and audiences that are typically under-served. Over the previous ten years, the rise in prominence of global platforms in national media systems has precipitated many changes in the media sector, including unique challenges for PSM institutions guided by specific public service values. Using a holistic conceptual framework for assessing the implementation of these values, this article analyzes the impact of platformization on Europe's PSM and discusses how the Union's policy approaches affect related challenges to PSM. The analysis indicates that while the European Union (EU) has accorded a high priority to PSM within its media policy framework, the role that Brussels plays in protecting the independence and efficacy of PSM has been circumscribed, given that the onus of regulating PSM entities rests with national governments. This has engendered contrasting experiences wherein certain PSM outlets enjoy political independence and command significant public trust while others function as state-controlled propaganda vehicles, advancing the objectives and interests of governing bodies. The EU has addressed global platform power in recent attempts to safeguard its digital future, including the Digital Services Act (DSA), Digital Markets Act (DMA), and the European Media Freedom Act (EMFA). However, these acts do not adequately address PSM's two central and often interconnected problems: funding challenges and political pressures.

Keywords: public service media; media policy; EU regulation; Digital Services Act; Digital Markets Act; European Media Freedom Act; platformization

1. Introduction

The historical development of public service media (PSM) is one punctuated by a myriad of significant challenges, spanning from political pressures (Šimunjak 2016) to fervent competition with commercial broadcasting entities and the relentless lobbying barrage launched by privately controlled media groups (Sjøvaag et al. 2019; Bardoel and Lowe 2007).

This intricate dynamic has consigned PSM to an exceptionally distinctive quandary. In terms of one aspect, it has been the object of political bodies and individuals who strive to wield these outlets as tools to accomplish their objectives while occupying a position of power. As a result, governmental bodies often seize control of the editorial direction of these broadcasters.

Yet, PSM institutions also find themselves in a unique position as they benefit from many advantages, encompassing public funds as well as regulatory privileges and protections. As a result, privately held media conglomerates have been incessantly trying to

destabilize their financial structure to undermine PSM's competitiveness and relevance (Lowe and Berg 2013).

Beyond those challenges, PSM organizations have grappled with diminishing public support. The public has progressively distanced themselves from these broadcasters in nations where PSM entities are subject to intense politicization. The expansion of the multi-channel broadcasting system during the 1990s exacerbated the identity crisis faced by PSM institutions within Europe (Larsen 2016). This evolution allowed audiences to avail themselves of an increasing group of commercial competitors, frequently presenting audiovisual content markedly more appealing than PSM conglomerates.

The advent of the Internet in the first decade of the 21st century ushered in a unique wave of complexities for all media players. PSM organizations, in particular, faced a series of obstacles in adjusting to the new ecosystem, especially in their endeavors to retain viewership, now allured by a copious assortment of content providers burgeoning across a rapidly expanding multiplicity of platforms. The digital economy, invigorated by the substantial technological progress of the two preceding decades, led to platformization, a phenomenon that fundamentally transformed the paradigms of content creation, dissemination, and exchange (Nieborg et al. 2019; Nieborg and Poell 2018; Helmond 2015).

As defined by Nieborg et al. (2019), platformization is understood as "the penetration of economic, governmental, and infrastructural extensions of digital platforms into the web and app ecosystems, fundamentally affecting the operations of media industries and production practices" (Nieborg et al. 2019). Such penetration has also affected PSM organizations as platformization prompted a departure from an editorially steered approach towards a demand-driven process (Poell et al. 2017). This paradigm shift carries profound implications for media outlets, impacting their journalistic independence and institutional autonomy (Pranz and Prinzing 2023). In the face of a world dominated by platforms, media entities were compelled to assimilate their operations into the most influential and renowned tech platforms, which have become the chosen destination for their audiences who moved there en masse to consume content (Poell et al. 2017).

To adjust to the platformized environment, PSM organizations had to transform their modus operandi to align with the evolving landscape (D'Arma et al. 2021; van Es and Poell 2020; Donders 2019). A segment of these organizations found themselves in a position where they needed to overhaul their distribution approaches (D'Arma et al. 2021), while others were forced to devise methods to assimilate audience commoditization (Sørensen et al. 2020) without exercising undue control over users or intruding on their media predilections (Andersson Schwarz 2016).

Some PSM organizations understand that the process of transformation ought to begin with an expansion of their mission as they swiftly transition into public service platforms (PSPs) (Bonini Baldini et al. 2021) while adjusting their operations to compete and stay relevant in the new market and technological logic imposed by social media platforms. As part of this process, some of them also understood that prioritizing user engagement (Marzal-Felici et al. 2021) is an indispensable strategy.

Drawing the line, the outcome of the PSM's attempts to adapt to and compete within this new landscape remains shrouded in ambiguity. Some academics argue that the PSM adjustment to platformization is an evolutionary process they will eventually undergo to survive (Berry 2020; Martin 2021). Other scholars predict a potential downfall for numerous PSM entities, as they would succumb to the pressures of this new reality as a result of several factors, ranging from an aversion to change, bureaucratic inefficiencies, and dwindling financial support (Fuchs and Unterberger 2021), to the swift fragmentation of their audiences (Gesto-Louro and Campos-Freire 2020).

As PSM organizations contend with both old and contemporary challenges, the EU has been expected to intervene more vigorously.

Historically, the EU has championed the protection of public service broadcasting, offering both regulatory measures and political backing. However, its influence has been circumscribed, as the Amsterdam Protocol[1] grants member states the ultimate power to

regulate the funding, governance, and mission of their respective public service broadcasters (Llorens 2019). Thus, national authorities ultimately determine and enforce most PSM- and media-related regulatory standards.

In the last five years, the EU has introduced a series of laws which are anticipated to directly (European Media Freedom Act adopted in 2024[2]) or indirectly (Digital Services Act (DSA)[3] and Digital Markets Act (DMA)[4] adopted in 2022) influence Europe's public service media sector (see Table 1). The DSA regulates online intermediaries and platforms to prevent illegal and harmful activities online and the spread of false news. The DMA aims to make the digital sector markets fairer by regulating the large digital platforms that provide platform services. The EMFA regulates the gatekeeping power of the platforms over access to media content. Of the three, EMFA is the only one with specific provisions for PSM.

Table 1. Relevance of the latest EU acts related to PSM.

	Aim Specifically Related to the PSM	Scope Relevant for PSM	Implications for PSM
Amsterdam Protocol	To strengthen the recognition of the value of public service broadcasting and its contribution to the democratic, social, and cultural needs in society, and to the preservation of media pluralism	Stipulates that the funding, definition, commissioning, and organization of public service broadcasting are the competence of each member state.	National governments have full authority to regulate PSM, provided that PSM financing schemes do not distort competition or the market.
Digital Services Act (DSA)	None	Introduces obligations on tech platforms to notify PSMs about changes in limitations imposed on their content. Offers PSMs new venues to lodge complaints against tech platforms in cases of measures limiting their content.	The relationship between PSMs and the third-party online platforms on which they distribute their content is expected to become more structured.
Digital Markets Act (DMA)	None	Prevents tech platforms from exploiting their dominant position in unfairly prioritizing certain services.	
European Media Freedom Act (EMFA)	To ensure "editorial" and "functional" independence of PSM	Requires member states to introduce mechanisms for fair appointment and dismissal of governing bodies, adequate and transparent funding schemes, and independent monitoring.	Although these provisions explicitly require guarantees for PSM independence, it will be up to national governments to decide what mechanism they will introduce (limitations of Amsterdam Protocol applying).

Sources: authors based on EU legal documents.

This article analyzes the repercussions of these three EU laws (DSA, DMA, and EMFA) for PSM organizations. Its objective is to identify the PSM-related areas in which EU legislation is likely to exert influence and those where the EU should intensify its efforts to protect PSM organizations more efficiently.

2. Materials and Methods

This analysis is based on a qualitative thematic analysis of the most recent media-related EU legal acts to understand how they address the challenges faced by PSM organizations. The three EU acts chosen for this study are the EMFA and the twin DSA and DMA legal package. These were selected as the key EU legal documents that were envisaged or hoped to influence PSM organizations (Rozgonyi 2023; Llorens and Muñoz-Saldaña 2023; Cole 2023; Voorhoof 2023; Holtz-Bacha 2024; Pollicino and Paolucci 2024). The DSA and DMA are designed to strengthen the European digital marketplace by en-

forcing shared responsibilities for all suppliers of digital services, with a particular focus on online platforms. The EMFA was created to improve and protect the independence of the European media, putting forward provisions in areas such as the transparency of media ownership, the independence of media regulation and public service media, media pluralism, and diversity.

These laws were analyzed based on a normative and empirical framework for the study of PSM developed by the authors (Dragomir et al., forthcoming) as an instrument to evaluate the influence that recent trends in four operational and activity areas of PSM (remit and governance, funding, audience, and content production) have on the guiding values of these institutions, as defined by the European Broadcasting Union (EBU): accountability, diversity, excellence, independence, innovation, and universality (EBU 2012).[5] The set of six values has gained universal acceptance and endorsement from the sector (EBU's 115 PSM organizations in 56 countries signed off on them), prominently featuring in the value-focused literature about PSM (Michalis 2023; Campos-Freire et al. 2019; Murschetz et al. 2023).

An analysis of how these challenges are addressed or likely to be influenced by EU-level legislative measures (namely, the three relevant EU laws examined for this article) is provided below after a summary of the value-related challenges facing PSM as operationalized by the framework.

3. Framework Results: Platformization and Challenges to PSM Values

Defined as digital structures functioning as intermediaries, platforms bridge the gap between a plethora of users, including advertisers, service providers, producers, and suppliers (Srnicek 2017). They have expanded across the digital milieu, establishing themselves as the architecture of the World Wide Web (Plantin et al. 2018; Van Dijck 2021). They are not merely a venue for user interaction and value creation but also potent instruments designed to mine and accumulate data from their users, a process that forms the bedrock of their business model (Van der Vlist and Helmond 2021; Arvidsson and Bonini 2015; Dong et al. 2024).

The concept of platformization has been extensively examined from various angles in recent years, with the literature covering an extensive range of topics such as society (Van Dijck et al. 2018), academia (Kumar et al. 2019), journalism (Hase et al. 2022), workforce (Gandini 2021), and the public domain (Smyrnaios and Baisnée 2023), to name but a few. With the rise of platforms as the dominant infrastructural and economic paradigm within the social web (Helmond 2015), platformization has significant implications for media industries and their production methods (Nieborg et al. 2019; Nieborg and Poell 2018).

The impact of platformization on PSM has also been extensively covered in the literature for nearly a decade. Yet, analyses have often taken a piecemeal approach, focusing on specific aspects such as collaboration with commercially funded streaming platforms or their presence on social media (D'Arma et al. 2023).

The normative framework established to examine PSM in the platform economy described above (see Section 2) was designed to provide a holistic analysis of the impact of platformization on PSM values (Dragomir et al., forthcoming). PSM organizations are confronted with challenges that are analogous to those encountered by their commercial counterparts. However, as they adapt to a platformized environment, they need to ensure that they adhere to the core values underpinning their mission. A departure from these values would result in a transformation of the institutions in question, potentially leading to an alignment with the values and characteristics observed in their commercial media counterparts.

The application of the framework revealed that funding and governance represent the most critical challenges facing PSM organizations across all four areas of investigation. One area, funding, is influenced by platformization. PSM organizations are forced to develop a financing model that is both justifiable and transparent to users, who must be able to understand the value they receive in return for their payments. The other area, governance,

is not connected to platformization and represents an older challenge. PSM organizations have historically been subject to political pressures and state-controlled manipulation. The majority of solutions to address issues in these two areas are primarily policy-driven.

Another area of significant challenges for PSM is audience engagement. PSM institutions strive to develop a communication and public participation model that is both distinctive from commercial competitors and sustainable, while also appealing to users. In professional development, there is more balance between threats and opportunities, which is unsurprising given that platformization affords all media outlets new venues to flourish and experiment with innovative content models. While certain policies can facilitate improvement, more comprehensive intervention from PSM organizations, particularly their management, is necessary to effectively address the issues related to audience engagement and professional development.

Finally, of the six values that underpin the PSM mission, independence, diversity, and excellence are the most vulnerable to platformization-related challenges. Diversity is also the PSM value with the greatest potential for advancement thanks to platformization (see Appendix A).

4. Analysis: The EU's Regulatory Responses to the Challenges to PSM Values

Two types of intervention—policy-based and organization-led—are required to address the challenges faced by PSM outlets in Europe as identified through the application of our normative and research framework (see Appendix A). Given the EU's purported influence in media-related policymaking, particularly regarding PSM, this section will examine the potential impact of the EU's most recent legal acts on PSM operations during unprecedented change. The analysis will concentrate on the four areas identified by the normative framework.

4.1. Legal Overview

The rise of digital platforms has prompted the EU to approve several regulatory measures that respond to the latest trends in the digital economy. In 2022, the Digital Services Act (DSA) and the Digital Markets Act (DMA) received official approval. The two laws are designed to strengthen the European digital marketplace by imposing a series of requirements on the suppliers of digital services. The law primarily targets online platforms (Llorens and Muñoz-Saldaña 2023).

Specifically, the DSA mandates platforms to articulate their strategies for mitigating the risks stemming from the unlawful dissemination of content and the manipulation of services that threaten public safety, democratic procedures, and user practices (Stollfuß 2024). It is incumbent upon these platforms to transparently showcase their efforts in content moderation, particularly in addressing the systemic risks that the DSA classified into four categories: risks linked to the propagation of illicit content, risks impinging on fundamental rights, deleterious impacts on democratic processes, and risks compromising public health, the safety of minors, and severe adverse effects on people's physical and mental wellbeing, or gender-based violence.[6]

The DSA can be relevant for PSMs as they will be notified when tech platforms alter or limit the exposure of their content. This legislation also allows PSM organizations to lodge objections against such decisions or regulatory non-compliance via both internal and external mechanisms (EBU 2023).

On the other hand, the DMA serves as a bulwark against platforms exploiting their dominant position to unfairly prejudice other services, including via the manipulation of content prioritization (Mazzoli 2023), which could potentially yield advantageous outcomes for PSM outlets.

However, the opportunities for PSM brought about by the DSA and DMA remain limited because no criteria for prioritizing PSM content have been included, a "missed opportunity" to address the imbalance between PSM and dominant platforms (Rozgonyi 2023).

Ultimately, additional EU laws, such as the Copyright Directive (2019) or the Regulation on Artificial Intelligence (2024), are anticipated to exert indirect influence on PSM, particularly in areas such as disinformation, copyright protection, and the media ecosystem (EBU 2024b).

4.2. Responses in the Areas with the Highest Risk for PSM: Governance and Funding

When it comes to governance, the prevailing circumstances within numerous PSM institutions throughout Europe continue to be fraught with difficulties, primarily attributable to their operational independence, which is often compromised by the processes of appointment and the dismissal of their boards. The Media Pluralism Monitor, a research project funded by the European Union, has identified 17 EU member states that are confronted with a medium and high risk concerning the independence of their respective PSM entities (CMPMF 2024).

The process of appointing the members of the PSM governing bodies continues to be vulnerable to political manipulation, particularly in—but not limited to—the Central and Eastern European nations where attempts to reform erstwhile state broadcasters into autonomous PSMs have been persisting for more than three decades, yet yielding largely unsuccessful outcomes (Jakubowicz 2008; Mungiu-Pippidi 2003). The matter of political party allegiance among the members of the PSM governing bodies is universally acknowledged as a significant obstacle to their independence. This has prompted the enactment of legal provisions in some European nations, prohibiting the appointment of people with political affiliations to PSM boards (Cabrera Blázquez et al. 2022).

The few positive examples of governance models that have proven effective in protecting the PSM's independence show the importance of including civil society in the selection and removal of governing bodies, as well as of diluting political sway by endowing political parties with equal power in the selection of those bodies. This approach is preferable to exclusively permitting the ruling party to make those decisions (Dragomir and Söderström 2022). On a more negative note, the politicization of governing bodies can also add another layer of instability to PSM governance. In Spain, for instance, the nationwide public service broadcaster RTVE has had three different Presidents over the last three years, a situation that hampers the implementation of a clear strategy.

When it comes to financing, PSM organizations within Europe predominantly derive their funding from a combination of state budget allotments and public financial resources external to the state budget. In 2022, state subsidies represented the most substantial segment of the budget for PSM organizations in approximately 60% of the European Broadcasting Union (EBU) nations. Conversely, license fees and diverse modes of financing constituted the most significant portion of the budget for PSM institutions in the remaining 40% of the countries (EBU 2024a).

In recent years, PSM institutions have struggled with a significant predicament, namely the crisis of the license fee-based model. One key factor that led to it is the shift in audience preferences towards video-on-demand (VoD) platforms where consumers enjoy the liberty to pay for the content of their selection. Another consequential factor is the mounting pressure from diverse political factions, particularly those leaning toward the far-right spectrum. These groups express dissatisfaction with the editorial coverage of PSM channels, seizing the opportunity presented by the rise of subscription-based platforms to critique the public funding-based models that keep PSM organizations afloat (Spudich 2023).

The funding model crisis poses the most severe threat to the future of PSM among all challenges identified within the scope of our framework. In the platform-centric media ecology, PSM organizations are compelled to pursue a funding paradigm that conforms to established benchmarks such as stability and adequacy, independence from political meddling, fairness and justifiability, as well as transparency and accountability. However, this is an intricate task, given the legal restrictions imposed on PSM organizations and the political terrain in which they function. Additionally, any refurbished PSM funding model needs the endorsement of audiences, which would only happen if audiences discerned

value in the PSM content vis-à-vis the programs available on commercial platforms and embrace the concept of public good that underpins PSM operations. Addressing this tension between the principles of PSM funding and the new content consumption logic imposed by platformization is by far the most daunting task that lies ahead for PSM outlets.

Regarding the challenges associated with their remit and governance, specifically the mechanisms for appointing and terminating PSM board members and the criteria for their qualification, governments throughout Europe have made no strides toward depoliticizing PSM governance structures.

Furthermore, except for a handful of PSM entities that have effectively transitioned to a levy/tax-based financing structure, funding solutions tailored to the platform economy have yet to be tested. This poses considerable risks to PSM organizations. Neither of the two non-tax-based solutions being circulated as solutions thus far seems adequate. A model fully anchored in the state budget will only amplify governmental control over these media entities. On the other hand, a shift towards a subscription model or privatization would inevitably lead to the disintegration of these organizations.

The EU has recently addressed PSM governance and funding-related challenges through the EMFA (see Table 2), an act that has been perceived as an attempt by the European Commission to increase the scope of its activities (Holtz-Bacha 2024). The EMFA acknowledges that media corporations cannot be treated like other enterprises, and their independence must be protected within the EU framework (Kozak 2024).

According to the EMFA, Member States are encouraged to establish protective mechanisms to ensure their independence. This is primarily achieved through the appointment of governance bodies, the financing of public services, and the institution of authorities or entities to oversee compliance.

However, it is unlikely that EMFA provisions will result in any tangible outcomes in the two areas. This is primarily because Member States have significant autonomy in determining the nature of their public audiovisual service, as set out in the Amsterdam Protocol (Cole 2023). This particularly applies to decisions related to the mission, operation, and content of such services.

This was the main reason why, historically, the EU could do little to effectively protect the independence of national PSM organizations. Apart from the European Parliament voicing concerns about potential threats to PSM independence in certain Member States[7] or endorsing the recommendations by the Council of Europe[8], the EU's response remained limited.

Regarding funding, the EU has been addressing the financial aspects of public media through its package of rules on state aid, which were adopted in 2001 and revised in 2009[9]. Over the decade ending in 2024, the Commission has issued a total of four resolutions in instances of state aid for public service broadcasting.[10] In three of them, the Commission decided not to voice objections, concluding that aid was compatible with the common market. In one case, the Commission put forth suitable measures to clarify the definition and scope of PSM.[11]

The Commission intervened in financial PSM-related issues, but only seldom and usually at the request of local NGOs and activists. However, there was room for improvement in the timeliness and efficiency of its response. In 2016, Mérték Média Monitor, a Hungarian media NGO, in collaboration with a Hungarian radio station and a Hungarian MEP, submitted a joint complaint to the European Commission. The complaint detailed how unlawful state aid is used to fund the Hungarian public media.[12] It took the Commission three years to request a response from the Hungarian authorities. After six years of assessments, the Commission accepted the Hungarian government's response in the summer of 2022. However, the Hungarian authorities' assertion that the Hungarian public service broadcasting financial mechanism has remained unchanged for nearly three decades lacked substantiation. Historically, the funding model of the Hungarian state-administered media has undergone significant alterations, transitioning from a license fee structure to a state budget model. This concluded the EU's involvement in the matter.

4.3. Responses in the Audience Engagement Area

Effective audience engagement strategies are paramount to the evolution of media outlets and are particularly crucial for PSM institutions, given their financial and regulatory advantages. The use of public funds to create content intended to cater to the broadest demographic, including marginalized communities with minimal or non-existent access to content, renders PSM outlets exceptionally responsible. Concerning the need to improve audience engagement, this responsibility is fulfilled when a significant level of distinctiveness, compared to its commercial counterparts, is attained.

Despite the swift proliferation of digital media in certain nations, PSM institutions have succeeded in maintaining or augmenting their distinctive programming. In several European countries, people discern that the quality of news content produced by PSM is higher than that of all other media offerings (Sehl 2020). In other countries, PSM organizations have successfully attracted politically diverse audiences spanning the left–right political continuum (Schulz et al. 2019). PSM channels are also one of the few media platforms that actively accommodate minority audiences, which do not present attractive commercial potential for privately owned media companies (Jacobs et al. 2016; Horsti and Hultén 2011).

Nevertheless, to achieve the level of audience engagement commanded by potent tech corporations and social media networks, PSM organizations still have to make significant progress. So far, many PSM institutions have exhibited a somewhat languid pace in involving audiences in content creation (Glowacki and Jaskiernia 2018). Engagement has remained confined to rudimentary forms, such as promoting user-generated content (Vanhaeght and Donders 2021).

A salient repercussion of the intensifying schism between certain PSM entities and their respective audiences is their diminishing appeal among younger spectators who prefer alternative platforms for entertainment and news consumption. As noted in the latest EBU report on PSM audiences, the ability of PSM to reach young audiences continues to decline, with weekly PSM reach falling by 3.2% in 2023 compared to the previous year (EBU 2024c).

Faced with this challenge, PSM organizations across Europe are trying to identify the most effective formats for engaging with their audiences in online spaces, with varying degrees of success. For example, in 2016, the BBC announced its decision to stop broadcasting BBC Three as a linear television channel (a decision reversed six years later) and move the service entirely online, citing the loss of younger viewers as the main reason for this strategic shift (Woods 2017). In contrast, in Germany, funk, an online video-on-demand platform run by the country's public broadcaster and aimed at younger audiences, has been highly successful in terms of aligning its distribution strategy with audience habits and preferences (Stollfuß 2019, 2024).

In terms of audience engagement, the EU is expected to play a role through the DSA and DMA, which are likely to provide PSM with more information about the limitations that social media platforms impose on their content (see Table 2). However, when it comes to significant initiatives, such as the development of strategies to re-engage with audiences in the platformized environment, the responsibility primarily falls on the management of PSM organizations.

4.4. Responses in the Professional Development and Content Production Area

The rapid evolution of the digital marketplace, coupled with the alterations triggered by the platform economy, has also forced PSM organizations to likewise embark on a process of adjusting their content strategies and newsrooms, moving away from a conventional production and distribution model that predominantly concentrated on broadcasting, to a more varied and multi-platform approach.

In certain countries, this has prompted a reconfiguration of the production process. To illustrate, the BBC implemented a strategy entailing collaborative newsgathering operations with platform-specific production to bolster efficiency and coordination (Sehl et al. 2019). On the other hand, in nations such as Italy, France, and Poland, PSM groups have been faced with an uphill task of converging their digital initiatives into a singular online

portal (Sehl et al. 2019). In the process, the reticence of staff voicing concerns regarding prospective job attrition has played a significant role. The reshaping of content production within PSM outlets has also been influenced by factors related to governance, including political interference and resistance by powerful trade unions, as well as considerations related to funding (Cañedo et al. 2024).

But besides all these difficulties, the platform economy has also furnished PSM with substantial opportunities for improved content propagation. PSM organizations frequently demonstrate superior dynamism on social media platforms than their commercial counterparts, disseminating more content on such platforms (Ferrer-Conill et al. 2023). Nonetheless, increasing dependence on social media networks can harm some PSM outlets (Meese and Hurcombe 2021).

In addition to these platformization-induced developments, PSM organizations consistently fight with a raft of longstanding hurdles in content creation and professional growth. One such trend is the wave of pressures levied by commercial rivals who decry what they perceive as an unfair competitive advantage enjoyed by PSM channels due to their access to public funds. This contention has recently garnered significant momentum, primarily facilitated by the presence of social media platforms, which offer a fecund environment for PSM critics to express themselves (Cushion 2019).

In terms of professional development and content production, the situation is somewhat mixed. The EU's DSA and DMA provide for PSM organizations, as they do for other media outlets, with enhanced opportunities to challenge social media platforms in instances where they restrict content (see Table 2). However, when it comes to addressing external pressures that impact the professional capacity of PSM organizations, none of the EU laws are applicable. Concurrently, a significant portion of the responsibility for the content development strategies devised by PSM organizations falls upon their management, contingent upon the outcome of their internal decision-making processes.

Table 2. EU responses to challenges to PSM values.

Area/Issue	Challenges/Threats	EU Response	Potential Impact of EU Law on National PSMs
Remit and governance			
Appointment and dismissal mechanisms for governing body members	Dominance by one political faction	EMFA	Dependent on national authorities
	Lack of civil society participation	None	
Qualification criteria for governing body members	Absence of professional competence as a criterion	None	
	Absence of provisions barring candidates with political links	EMFA	Dependent on national authorities
Relationship with state bodies	Reporting to state authorities: possibility of dismissal of board members and budget cuts	None	
Financing			
Funding trends	Flat growth of PSM funding	None	
	Forecast decrease in PSM funding	None	
Funding models	Failing to retain public funding models (license fee, various forms of taxation)	EMFA	Dependent on national authorities
	Reliance on state budget allocations	EMFA	Dependent on national authorities
	Switch to user-based funding models (i.e., subscriptions, etc.)	None	

Table 2. *Cont.*

Area/Issue	Challenges/Threats	EU Response	Potential Impact of EU Law on National PSMs
Preferential access to infrastructure	Loss of advantaged position in the frequency spectrum *	Not covered by the analysis	
Audiences			
Use of public service media content	Dwindling trust in PSM news output	Organization-specific, limited room for EU regulation	None
	Decline of diverse, balanced political coverage	DSA, DMA	Transparency over content exposure limitations
	Low awareness of the PSM mission	Organization-specific, limited room for EU regulation	None
Audience outreach	Aging audiences	Organization-specific, limited room for EU regulation	None
Public participation in content production	A mismatch between the goals of the media and the interest of the public	Organization-specific, limited room for EU regulation	None
Professional development and content production			
Automation and digital integration	Slow adoption of new tech, especially artificial intelligence, in content production	Organization-specific, limited room for EU regulation	None
	Failure to boost the content distribution, access to more sources and data	DSA, DMA	Lodging complaints against large platforms
	Role in reducing exposure to false news	DSA, DMA	Lodging complaints against large platforms Transparency over content exposure limitations
External pressures	Intensification of pressures from commercial players	None	
	Government pressures	EMFA	Dependent on national authorities
	Pressures from social networks on editorial strategy	DSA, DMA	Lodging complaints against large platforms
Safeguards for editors and newsroom	Lack of legal provisions guaranteeing newsroom's independence	None	

* new problem, yet not related to platformization. Source: authors.

5. Conclusions

Although the EU uses various policy tools to protect the independence of PSM organizations throughout the continent, the influence of EU legislation on the essential aspects of PSM's editorial and operational independence has been relatively minimal.

In the past decade, the convergence of technology has blurred the lines between traditional media platforms and digital outlets. This shift has posed a challenge for both EU and national policymakers, who often struggle to address the multifaceted nature of modern media within existing regulatory frameworks. In this complex landscape, PSM organizations face a string of complex challenges, including ever-evolving technology, the increasing power of global platforms in national markets, political polarization, and diminishing trust in democracy and democratic communication among citizens.

The way that PSM organizations in the EU have responded to the phenomenon of platformization has differed among countries. Some outlets have successfully taken advantage of the opportunities presented by the platform economy, while others have yet to. Some organizations adapt faster to the platformized media environment, while others are falling behind (Dragomir and Tuñez, forthcoming).

It is safe to say that PSM all over Europe face many apparent challenges to their values as a result of technological changes, new audience preferences, and a heightened competitive landscape, for example, due to the shift to over-the-top platform services and the global dominance of actors such as Netflix (Arjona Martín 2021). The influence of social media platforms has prompted some PSM organizations to develop content delivery channels that align with the platform's logic. In Germany, for instance, the introduction of funk, an online video-on-demand platform operated by the country's public broadcasters, was prompted by the rapid decline in traditional television viewership among younger demographics. While the service was commended by some for its responsiveness to the evolving media landscape, its creation was also perceived as a sign of a growing alignment between television and social media culture, which could potentially give tech platforms greater influence over the future of public service television (Stollfuß 2019).

At the same time, platformization can be viewed as a complex and controversial development for PSM (Rivero 2023), and not only as a negative development. For instance, it has been argued that the presence of PSM in social media platforms can support some of the core values and aims, such as universality via dissemination and diversity via dialogues (Moe 2008).

Today, with the challenges and promises of artificial intelligence (AI) significantly impacting the field of the media era, there are many new opportunities for PSM. From the perspective of individual audience members, PSM AI can function similarly to any media in curation and personalization by offering relevant, tailored content and services, thus supporting individual citizens' information, educational, and entertainment needs. In terms of industry impact and values, PSM can become a leader through the ethical use of AI and by innovating for distinct applications of AI. Most importantly, from the perspective of societal value, PSM AI can be a tool with a specific public service mission to support human rights and citizenship through, for example, exposure to diversity and reversing bias (Horowitz et al. 2023).

Research conducted for this article revealed two challenges that all PSM organizations across Europe are confronted with: a deepening crisis of the PSM funding model, made worse by platformization's pressures, and an increased level of state control, which has been a long-standing issue for PSM organizations, predating platformization.

Regarding funding, PSM entities, especially those reliant on license fees or other forms of audience contributions, are facing increased scrutiny for reform. There is a prevailing consensus that, to maintain a PSM that remains true to its fundamental mission and values, embracing a tax-based funding model is preferable to relying on subscriptions or other forms of revenue used by commercial providers. In countries where PSM organizations rely on government funding, the issue of political influence remains a significant concern, affecting the independence of these institutions.

The second key finding that emerged through the application of our framework is the troubling connection between the government and PSM. This linkage is conspicuously starting to influence broadcasters hitherto perceived as independent, such as ORF in Austria and the BBC among many others (Dragomir and Tuñez, forthcoming), menacing these institutions' capacity to execute their public service obligations.

This intersection between financial instability and government control is a significant threat to upholding diversity and independence, two of the six values underpinning the PSM mission.

The EU addresses the two major threats to the EMFA, which is undoubtedly the EU's most ambitious effort to protect European media freedom. However, the mechanisms to ensure that the EMFA provisions are followed at the national level are lacking.

Moreover, the European Commission's role in the EMFA implementation is limited to issuing opinions, engaging in a dialog with national governments, and conducting regular monitoring activities, which are not likely to have a palpable effect on the national level. As noted by Bayer and Cseres (2023), the EMFA provisions do not offer sufficient guidance on how decisions should be made or by whom. With much room for Member States to make decisions on these matters, the EU has "no direct impact on the definition, governance or structure of PSM" (Llorens and Muñoz-Saldaña 2023, p. 11).

On the other hand, legal acts evolve in response to emerging issues, as is likely to be the case with the three acts under consideration. However, this could be too late for PSM organizations as they may be compelled, in their attempt to adapt to the platform-centric environment, to compromise, if not wholly abandon, the values that underpin their mission. The problem is, as van Es and Poell (2020) note, that PSM strategists and policy-makers are acutely aware of the impact of platformization but have not yet been able to develop powerful and coherent responses to the opportunities and challenges posed by the dominance of commercial platforms. Our analysis suggests that a comprehensive response is needed, not only from national policies, but also from the EU, which could play a significant role in supporting those efforts from several vantage points. So far, such a policy approach from the EU is not evident.

Appendix A

Table A1. Overview of the challenges to PSM values: a normative and empirical framework for the study of PSM.

Area/Issue	Challenges/Threats	PSM Value under Threat	Key Factor	Type of Response Needed
Remit and governance				
Appointment and dismissal mechanisms for governing body members	Dominance by one political faction	Independence Diversity Accountability	Older problem	Policy
	Lack of civil society participation	Independence Diversity Accountability	Older problem	Policy

Table A1. *Cont.*

Area/Issue	Challenges/Threats	PSM Value under Threat	Key Factor	Type of Response Needed
Qualification criteria for governing body members	Absence of professional competence as a criterion	Excellence	Older problem	Policy
	Absence of provisions barring candidates with political links	Independence Accountability	Older problem	Policy
Relationship with state bodies	Reporting to state authorities: possibility of dismissal of board members and budget cuts	Independence Accountability	Older problem	Policy
Financing				
Funding trends	Flat growth of PSM funding	Independence Excellence Diversity Innovation	Platform-related	Policy
	Forecast decrease in PSM funding	Independence Excellence Diversity Innovation Universality	Platform-related	Policy
Funding models	Failing to retain public funding models (license fee, various forms of taxation)	Independence Universality	Platform-related	Policy
	Reliance on state budget allocations	Independence Accountability Diversity	Older problem	Policy
	Switch to user-based funding models (i.e., subscriptions, etc.)	Universality Diversity	Platform-related	Policy Organization-led
Preferential access to infrastructure	Loss of advantaged position in the frequency spectrum	Universality	New problem *	Policy
Audiences				
Use of public service media content	Dwindling trust in PSM news output	Universality Accountability	Platform-related Older problem	Organization-led
	Decline of diverse, balanced political coverage	Independence Diversity	Older problem	Policy Organization-led
	Low awareness of the PSM mission	Universality Independence Accountability	Older problem	Organization-led
Audience outreach	Aging audiences	Universality Diversity Innovation	New problem	Policy Organization-led
Public participation in content production	A mismatch between the goals of the media and the interest of the public	Excellence Innovation	Platform-related	Organization-led
Professional development and content production				
Automation and digital integration	Slow adoption of new tech, especially artificial intelligence, in content production	Excellence Innovation	Platform-related	Organization-led
	Failure to boost the content distribution, access to more sources and data	Excellence Innovation Universality	New problem	Organization-led
	Role in reducing exposure to false news	Excellence	Platform-related Older problem	Organization-led

Table A1. *Cont.*

Area/Issue	Challenges/Threats	PSM Value under Threat	Key Factor	Type of Response Needed
External pressures	Intensification of pressures from commercial players	Independence Excellence Universality Diversity	Platform-related Older problem	Policy Organization-led
	Government pressures	Independence Accountability	Older problem	Policy
	Pressures from social networks on editorial strategy	Independence Diversity Excellence	Platform-related	Policy Organization-led
Safeguards for editors and newsroom	Lack of legal provisions guaranteeing newsroom's independence	Independence Diversity Excellence Accountability	Older problem	Policy

* new problem, yet not related to platformization. Source: Reference removed anonymization.

Notes

[1] Treaty of Amsterdam amending the Treaty on European Union, the Treaties establishing the European Communities and certain related acts—Protocol annexed to the Treaty of the European Community—Protocol on the system of public broadcasting in the Member States, Official Journal, 10 November 1997, https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX: 11997D/PRO/09 (accessed on 10 May 2024).

[2] Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act) OJ L, 2024/1083, 17 April 2024, ELI: http://data.europa.eu/eli/reg/2024/1083/oj (accessed on 1 May 2024) (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, HR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV).

[3] Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) (Text with EEA relevance) PE/30/2022/REV/1 OJ L 277, 27 October 2022, pp. 1–102.

[4] Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) (Text with EEA relevance) PE/17/2022/REV/1 OJ L 265, 12 October 2022, pp. 1–66.

[5] Universality underscores the importance of PSM in guaranteeing accessibility to all segments of society. Independence is commonly perceived as the capacity of these media organizations to make independent decisions regarding their operations and organizational matters, including programming choices, editorial agendas, and staffing strategies. The concept of excellence in PSM is defined by the commitment to upholding high professional standards. Diversity entails the presentation of a wide range of perspectives from various segments of society, including minority groups, different age cohorts, and diverse cultural and religious backgrounds. Innovation refers to the promotion of novel and creative journalistic and programming formats, technologies, and methods of audience engagement. To ensure accountability, PSM need to establish comprehensive editorial guidelines and embrace transparent policies, budgets, and editorial decision-making processes.

[6] See more on the European Commission website: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act_en (accessed on 10 July 2024).

[7] Report on media pluralism and media freedom in the European Union (2017/2209(INI)), https://www.europarl.europa.eu/doceo/document/A-8-2018-0144_EN.html (accessed on 10 July 2024).

[8] See note 7.

[9] Communication from the Commission on the application of State aid rules to public service broadcasting, Official Journal of the European Union, 27 October 2009, https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52009XC1027(01)#ntr1-C_2009257EN.01000101-E0001 (accessed on 20 July May 2024). It should be noted that the application of state aid rules is anchored in various other EU legal documents. For example, the state aid assessment is covered by the Treaty on European Union, and the competition rules and aid to promote culture are regulated by the Treaty of Maastricht. The Treaty of Amsterdam and the Amsterdam Protocol also have provisions that cover the financial aspects of public service broadcasting. The AVSMD refers to public service media, albeit vaguely, stating that benefiting from "technological progress" is necessary for the fulfillment of the mission of public service broadcasting. Finally, the Transparency Directive puts forward a series of requirements on the

transparency needed in public undertakings. The Commission has also adopted a series of communications on the application of the state aid rules.

10   European Commission Competition Directorate-General, "Legal Framework conditions applicable to State aid to public service broadcasting", 31 March 2022, https://competition-policy.ec.europa.eu/system/files/2022-06/stateaid_decisions_public_service_broadcasting.pdf (accessed on 1 August 2024).

11   European Commission, 'State aid: Commission approves amended financing regime of Belgian broadcaster RTBF', 7 May 2014, https://ec.europa.eu/commission/presscorner/detail/en/IP_14_523 (accessed on 1 August 2024).

12   'Funding for public service media in Hungary—a form of unlawful state aid?', Mérték, 9 January 2019, https://mertek.eu/en/2019/01/09/funding-for-public-service-media-in-hungary-a-form-of-unlawful-state-aid/ (accessed on 1 August 2024). For more, see State aid complaint No. 45463.

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