

EMMA and ENPA response to the European Commission Green Paper “Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values”

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(1) About EMMA and ENPA

The European Magazine Media Association, EMMA, represents 15,000 magazine publishers across Europe, publishing more than 50,000 magazine titles on all platforms: paper, online and mobile devices.

ENPA is an international non-profit association, advocating the interests of publishers of newspapers and news media in Europe. ENPA has 31 member associations from the EU Members States, as well as Norway, Switzerland and Serbia. Together its membership represents some 5,200 national, regional and local newspaper titles, published across Europe.

EMMA and ENPA share the aim of ensuring a sustainable free, independent, pluralistic, diverse and economically successful press publishing industry in Europe. In this logic, our organisations defend freedom of expression, thus promoting pluralism and diversity, in order to ensure that Europe's press sector remains competitive and vibrant.

Today the European press sector, a majority of which is made up of small and medium-sized companies, is increasingly technologically neutral and reaches millions of readers via digital platforms.

(2) Developments and trends in European press sector

While print circulation has seen declines in many European countries, readership of newspapers and magazines across all platforms has never been higher, as readers access news content in print or via a wide range of digital formats (website, tablet applications, news on mobile devices etc.). Publishers of newspapers, news media and magazines have innovated quickly to provide consumers with professional press content in the digital environment.

Newspaper and magazine websites regularly rank among the most nationally visited sites throughout Europe. This trend towards Internet news readership shows no signs of slowing; on the contrary, the number of unique visits to popular news websites continues to show exponential growth, while millions of readers are accessing press content via mobile devices. The goal of newspaper and magazine publishers today is therefore to develop sustainable business models that will allow them to have sufficient revenues from the digitisation of news, information, opinion and analysis.

Europe's press publishers have been able to build up a trusted relationship with their readers by staying in tune with their needs. The fact that readers have demanded the possibility to access content they choose when and where it suits them has therefore resulted in magazines and newspapers being available on multiple platforms, often with interactive capabilities. Consequently the journey that Europe's news and magazine media have taken with their readers to social networks and onto mobile devices, such as smart phones and e-tablets, means that new business models are required to reflect the new integrated approach and ensure a sustainable funding of a free and independent press. The availability of more than 5,200 newspaper and 50,000 magazine brands across Europe in print and digital is fostering the role of the technologically neutral press in our democratic society and thereby ensuring media freedom and diversity.

It is clear that press publishers play a valuable role in today's digital ecosystem. Dedicated to providing readers with reliable and quality journalism on all types of devices, as well as in print, they are investing hundreds of millions of Euros in developing professional content offerings. Such digital press offerings increasingly now also include supplementary editorial videos (i.e., which are not the main purpose of the editorial content, unlike broadcast media), which is particularly relevant as regards this particular Commission consultation.

Building viable business models and addressing new audiences is a prerequisite for a successful and accessible press sector in the digital environment. Publishers today have a multitude of revenue streams and are adapting, as well as proactively shaping, the new media landscape. In order to build new business models, the press needs a fair business environment that allows them to develop and maintain the sustainable funding of quality journalism both in print and digital formats. While in the printed world the revenue is drawn from selling content and advertising (average: 50/50), in the digital world an average of more than 90% of the revenue is from advertising and less than 10% is from selling content.

Publishers are successfully building new business models in the digital environment, but remain vulnerable at this transitional stage in their development. Indeed, it seems that many newspaper and magazine publishers have yet to see a meaningful return on their significant investments in digital innovation. In order to be able to move towards profitable and more sustainable business models for a free, independent and technologically neutral press in Europe, a fair business environment is required, specifically a level playing field that allows effective competition of offers and services as well as non-discriminatory access to customers on all platforms.

The challenge ahead for the European press sector is to overcome the obstacles to exploiting the opportunities they have created as a result of recent innovations. These obstacles include regulatory challenges as well as anti-competitive practices by bigger global players. Besides legal certainty and flexibility, publishers also require a level playing field in order to have room for innovation and development.

(3) ENPA and EMMA comments on the European Commission's Green Paper

(a) Introductory comments

We welcome the opportunity to comment on this important topic and feed into the Commission's consultation process. We think that it would be **extremely premature, however, to start considering changes to the current legislative framework** at this stage, given that the market is still developing and also bearing in mind that it is only recently that the Audiovisual Media Service Directive (AVMSD) was implemented. We therefore believe that the current framework of the AVMSD should remain in place for the time being.

The objective of the Commission's Green Paper "Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values" (COM(2013) 231) is "to open a broad, public discussion on the **implications of the on-going transformation of the audiovisual media landscape**, characterised by a steady increase in the convergence of media services and the way in which these services are consumed and delivered." It describes "convergence" as "the progressive **merger of traditional broadcast services and the internet**."

Press publishers have invested heavily in developing digital offerings in response to what their customers want, and their content is today widely accessible, being found on all platforms across Europe. It is important to underline that despite all the technological developments, **the possibility to access different types of content from the same devices has not led to a “convergence” of audiovisual media and the digital press. There still remains an important differentiation between linear and non-linear services.** It is typical in linear services for the user to have no influence on the flow of the programme and these services are programmed in a way that the spectator will keep watching one programme after the other. Broadcasting services, no matter on which device, are still mainly enjoyed like classic television ("lean back" style). It must also be noted that traditional television consumption in many European countries - despite all the newly introduced media services and forms of use – is growing. Even on hybrid devices (e.g., Internet-enabled so called connected TVs) it is predominantly classic linear TV which is consumed, according to recent studies.

The on-demand media services of the press are, by contrast, not offered for linear use and it continues to be up to the user to consciously select the individual content and decide which services to watch. Audiovisual on-demand services of the press are, moreover, embedded in a diverse integrated media environment (of text, photos, graphics, multimedia elements) and do not represent the main purpose of the editorial content, unlike broadcast media. These services therefore differ substantially - both as regards perception and effect - from linear services. The assumption arising in some of the questions in the Green Paper of an already existing media convergence with the Internet therefore needs to be considered in a differentiated way.

It is important to underline from the outset, however, that **the press sector in Europe, in all its forms, cannot be regulated in the same way as broadcasting services** which are based on state licensing, prior authorisation, supervision of content by authorities, co-regulation and specific, strict commercial communications restrictions.

Every regulation of audiovisual media has to take account possible consequences for press freedom and the conditions for the existence of a free and independent press. Any regulation of audiovisual media must neither interfere with the freedom of press publications nor impair the general conditions for the digital press. Media policy in general should aim at ensuring positive conditions for the future of the technologically neutral press landscape.

Before responding with specific comments to the relevant questions, we would like to highlight in particular the following key points, regarding editorial videos used on publishers' websites and competition with broadcast media on common platforms:

1. No extension of the AVMS Directive to editorial videos that are not the main purpose of editorial media offers (particularly relevant for questions 10, 11, 13)

The AVMS Directive applies to editorial media, whose main purpose are television and “television-like” (i.e. video) programmes. Editorial videos that **do not form the main purpose** of editorial content - such as in the numerous digital press offers – do not fall under this Directive. These videos fall under the E-Commerce Directive and therefore – quite rightly - state licensing requirements and other restrictive measures do not apply. These videos are of course still regulated as editorial media and electronic services, but importantly respecting press freedom, one of our fundamental European values. We can see no compelling reason for the need to introduce further restrictions in this regard.

Furthermore, we are not aware of any relevant market distortions under the current situation (i.e. with supplementary videos not covered by the AVMS Directive), between press services using these additional videos on the one hand, and editorial media offerings where videos are the principle purpose or broadcasting services on the other hand.

2. New devices should not justify an extension of the AVMS Directive or other broadcasting related restrictions beyond those audio-visual media services currently regulated

Just because a device allows for both access to the internet as well as the possibility to access other media such as television, this does not legitimise the extension of restrictive aspects of broadcasting regulation to the media offered on this device.

3. Any new regulation should not trigger the preferential searchability and accessibility of broadcast media versus digital press on hybrid platforms (particularly relevant for questions 15, 16)

Digital editions of newspapers and magazines as well as other online press offers are increasingly offered on the same device and on the same platform as broadcast programmes, and non-linear audio-visual media services are available for users, readers and viewers.

There is a risk that broadcasters would get more favourable treatment than the press and that such a differentiation of editorial media would lead to a government rating of editorial content. This is unacceptable as it contradicts the principle of an independent and (state) free media across Europe. Any attempts to promote the searchability and accessibility of broadcast programmes and of "content of general interest" by regulatory means on hybrid platforms or other end-devices raises the issue of state promoted audio-visual editorial content versus non-editorial content, as well as the issue of choice between press editorial content and broadcast editorial content.

4. Any media offers, including broadcasting, other audio-visual media and the digital press must have open access to devices based on free competition for viewers, users and readers (particularly relevant to questions 15, 16)

It is not a legitimate goal of media regulation to give television or other audio-visual media preferential access to digital platforms over the digital press (see item 3).

Furthermore it must be a goal of media policy to allow the digital press - that today reaches out to its readers via all available digital devices - fair, visible and unobstructed access to hybrid devices. Users should not be hindered from accessing digital press offers such as electronic programme guides (EPGs), for example, and be able to click through to what they want to view.

(b) Specific Comments

While many of the points raised in the Green Paper are more relevant to broadcasters and the audio-visual sector, there are various aspects that we would like to comment on, particularly under Chapter 3 that looks at the implications of convergence for "values" such as media pluralism.

Comment 1: Regulatory framework
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Question (10)

Given convergence between media, is there evidence of market distortion caused by the regulatory differentiation between linear and non-linear services? If yes, what would be the best way to tackle these distortions while protecting the values underpinning the EU regulatory framework for audiovisual media services?

As already mentioned at the beginning of this submission, it is important to underline that despite all the technological developments, **the possibility to access different types of content from the same devices has not led to a convergence of audiovisual media and the digital press. There still remains an important differentiation between linear and non-linear services.** It is typical in linear services for the user to have no influence on the flow of the programme and these services are programmed in a way that the viewer will keep watching one programme after the other. Whereas, for non-linear services, the user selects which services he or she wants to watch. The

assumptions arising in the Green Paper of an already existing media convergence with the Internet should therefore be considered in a differentiated way.

The AVMS Directive applies to editorial media, whose main purpose are television and “television-like” (i.e. video) programmes. Editorial videos that **do not form the main purpose** of editorial content - such as in the numerous digital press offers – do not fall under this Directive. These videos fall under the E-Commerce Directive and therefore – quite rightly - state licensing requirements and other restrictive measures do not apply. These videos are of course still regulated as editorial media and electronic services, but importantly respecting press freedom, one of our fundamental European values. We can see no compelling reason for any need to introduce further restrictions in this regard.

Furthermore, we are not aware of any relevant market distortions under the current situation (i.e., with supplementary videos not covered by the AVMS Directive), between press services using these additional videos on the one hand, and editorial media offerings where videos are the principle purpose or broadcasting services on the other hand.

Question (11)

Is there a need to adapt the definition of AVMS providers and / or the scope of the AVMSD, in order to make those currently outside subject to part or all of the obligations of the AVMS or are there other ways to protect values? In which areas could emphasis be given to self/co-regulation?

We believe that the current legislative framework should remain the basis of media regulation in Europe. **Extending the AVMSD beyond television (or ‘television-like’) programmes to cover other online content and non-linear services such as the digital press (the provision of which is regulated by the e-Commerce Directive), would be contrary to press freedom** and the need to preserve editorial independence of press content and services.

In particular, the explicit exclusion of electronic versions of newspapers and magazines – as set out in the AVMS Directive (recital 28) - is indispensable in order to ensure a free, independent and pluralistic press, thus guaranteeing the freedom of expression in Europe. It would be inappropriate for the use of audiovisual content such as a video clip which complements publishers’ written content – i.e. which is not the principal purpose of their offering – to be subject to the same rules as broadcasting services, which are based on state licensing, prior authorisation, supervision of content by authorities etc.

Question (14)

What initiatives at European level could contribute to improve the level of media literacy across Europe?

News media are the ultimate sources for media literate citizens. The press sector has a fundamental role to play in promoting the development of media literate and socially engaged citizens who have an understanding of local, national and global events. The role of publishers in promoting media literacy, in both the print and digital environment, was recognised in the 2009 European Commission Recommendation on media literacy (2009/625/CE).

The newspaper industry across the different markets in Europe has been active for many years at national level in specially developed “Newspaper in Education” programmes in primary and secondary schools. A diverse selection of these initiatives from 18 countries across Europe will be showcased in a forthcoming ENPA publication on media literacy, “What’s your News?”. To give a flavor of these projects, they include:

- **Belgium:** newspapers and educational tools delivered to schools
- **France:** age-specific print dailies for children, teenagers
- **Germany:** reading promotion from kindergartens to high school
- **Hungary:** student competition ‘to dream a newspaper’ for future
- **Italy:** journalist visits to schools, student reports published in press
- **Netherlands:** print and digital news media delivered to schools along

- with educational materials, a monthly news quiz
- **Poland:** 'schools without violence' campaign by regional press
- **UK:** 'Get London Reading' campaign with volunteer readers in schools

In ENPA's view, news media should be an essential part of any educational programme that focuses on the ability of citizens to inform themselves and to analyse current social, political and economic developments. In fact, programmes for the formation of media literate citizens are incomplete without news media components.

Several successful media literacy initiatives and projects have also been launched by the magazine sector in Europe in the last years. One example is "Magazines in Education", a project coordinated by the Finnish Periodical Publishers' Association (FPPA). It has been promoted with the objective of guiding children and youths towards critical reading with awareness and has shown really positive results. It is succeeding in making young people improve their reading experience and media competence and in helping them develop the capacity to distinguish among different sources of information.

The FPPA project is just one of the media literacy programs that have developed around Europe. Similar initiatives include "Magazines in Schools", promoted by the German Presse Grosso Foundation and Stiftung Lesen, "Knack op school" and "Vif à l'école" of the Belgian Roularta Media Group. Sweden and Ireland also have media literacy as part of the school curriculum.

In the digital era, these projects have shown to be really helpful to media users in the understanding of how and why media content is produced and in the evaluation of how trustworthy different sources are. These programmes both help young people approach media content, distinguish between fact and opinion, and between editorial and advertising, as well as teaching them how to create their own press content.

Comment 2: Media freedom and pluralism

It is a fundamental basis of press freedom in a democratic society to protect access to information in the course of journalistic research; the production of press products; and distribution to readers, both in print and digital formats. These essentials guarantee a competitive press environment and thus a free, independent, diverse and vibrant press. It is crucial that net neutrality principles should also be respected in the debate on the AVMSD and Connected TV. It is in particular important that there is **no discrimination against, or prioritisation of, certain content providers and to maintain competition**, to enable the diversity of the press across Europe.

This type of discrimination would be a further barrier for many publishers, who continue to invest substantially in developing digital business models so their material can be enjoyed across the Europe. We cannot support a system which provides for privileged status for e.g., public broadcasters with regard to "findability". There should be freedom of choice for consumers.

To guarantee the visibility and the accessibility of all types of content on the Internet, it is necessary that all players respect **fair and transparent business practices**. This is particularly important in the search sector as search results play a crucial role in guiding users to the various content and services available online. Fair and transparent search would support fair competition between media services providers, the existence of a diversity of press titles across Europe and the development of new business models.

Finally, publishers must be able to decide how parts of their content and services are used and published. Maintaining control of their content is a crucial part of the strategic decision-making process of each publisher and must not be undermined by opt-out regimes imposed by dominant market players. Only then can a free, independent, diverse and vibrant press be sustained across Europe in the long-term.

Question (15)

Should the possibility of pre-defining choice through filtering mechanisms, including in search facilities, be subject to public intervention at EU level?

In the digital age, non-discriminatory and fair access to all editorial media needs to be the highest priority. Political determination of the range of choices, filtering mechanisms or search functions for media services would therefore be very problematic.

The objectives of safeguarding cultural diversity and media pluralism should be secured by the means that currently exist for the digital press in the open Internet, given that this has allowed for unprecedented media diversity. In particular political specifications have to be rejected that influence selection, search, and any other indicators relevant for the access to specific content in favour of broadcast media content and to the disadvantage of digital press offers.

While new, attractive content is being developed, the personalisation of services is also of growing importance. Generally speaking, we do not believe that public intervention against filtering and personalisation applications at EU level is required, except for where there is an abuse of dominant position. In such cases, the EU must be able and willing to enforce EU competition law consistently.

A more recent element to arise in the debate on searchability and access to content is the question of how to address a dominant market player in the search engine market, that in effect decides which content will be found on the Internet. This question, which is currently under consideration by the EU competition authorities, is certainly a relevant point for discussion in the broader debate relating to search.

It should also be underlined that press publishers are facing a situation today where professional content, financed and developed by publishers is too often used by aggregators and other third parties as an added value for their commercial services, without prior consent. It is therefore essential that there should be full respect for copyright law wherever content is used by aggregators etc., and that there is prior consent for any use.

Question (16)

What should be the scope of existing regulation on access (art 6 Access Directive) and universal service (art. 31 Universal Services Directive) in view of increasing convergence of linear and non-linear services on common platforms? In a convergent broadcast/broadband environment, are there specific needs to ensure the accessibility and the convenience to find and enjoy "general interest content"?

Any new regulation should not trigger preferential searchability and accessibility of broadcast media versus digital press on hybrid platforms or other end-devices. Digital editions of magazines as well as other online press offers are increasingly offered on the same device and on the same platform as broadcast programmes, and non-linear audio-visual media services are available for users, readers and viewers.

Any attempts to promote the searchability and accessibility of broadcast programmes and of "content of general interest" on hybrid platforms or devices by regulatory means raises the issue of state promoted audiovisual editorial content versus non-editorial content, as well as the issue of choice between press editorial content and broadcast editorial content. The risk is that such a differentiation of editorial media would lead to a government rating of editorial content. This is unacceptable as it contradicts the principle of an independent and (state) free media across Europe.

Any media offers, including broadcasting, other audiovisual media and the digital press must have open access to devices based on free competition for viewers, users and readers. It is not a legitimate goal of media regulation to give television or other audiovisual media preferential access to digital platforms over the digital press (see item 3).

Furthermore it must be a goal of media policy to allow the digital press - that today reaches out to its readers via all available digital devices - fair, visible and unobstructed access to hybrid devices. Users should not be hindered from accessing digital press offers such as electronic programme guides (EPGs), for example, and be able to click through to what they want to view.

Comment 3: Commercial communications

Question (17)

Will the current rules of the AVMS regarding commercial communications still be appropriate when a converged experience progressively becomes reality? Could you provide some concrete examples?

As set out above, we believe that the current framework of the AVMSD should remain in place for the time being, and it would be premature to already start speculating what will be needed in the coming years as the current landscape changes.

Qualitative advertising rules

Firstly, the AVMS Directive has **extended some content (qualitative) bans** on TV advertising to audio-visual media services on-demand. This seems inappropriate and is considered as an interference with freedom of expression and media freedom.

This is certainly the case as regards limitations concerning on-demand videos in the open Internet, regardless of whether the respective contents are part of on-demand audio-visual media services or not.

Consequently, with the unlimited number of programme slots in the open internet it is not obvious anymore how these problematic political advertising bans for linear audio-visual content can be justified.

In times of limited broadcasting frequencies such specific bans might have been legitimate for a long time. They appear today outdated and should be abandoned altogether.

Quantitative advertising rules

The ban of advertising content (qualitative requirements) infringes the freedom of communication of both the advertiser and the respective media providers. This must be distinguished from **so-called quantitative rules**, which do not limit the freedom of possible advertising content, but the limitation of advertising time in relation to the amount of editorial content. In particular, Article 23 limits the advertising time per hour of broadcasting programme to a maximum of 12 minutes, without applying these rules to on-demand audio-visual media.

This reflects the fact that consumers of on-demand media may respond more easily than recipients of linear programmes should they find advertising slots too long. Any discussions on whether such quantitative restrictions of advertising volumes in one medium are outdated must also take into account that quantitative limits for advertising in one medium can from a media policy standpoint also have a positive control and distribution function with regard to the advertising financing of other media.

The 12 minute per hour limitation for advertising duration for broadcast programmes was established in the first place as a consumer protection measure and to allow a fair distribution of advertising between different media. It is important that this limit remains in place.

In the interests of maintaining a vibrant and pluralistic media landscape, where the broadcast media and the press can co-exist successfully as vehicles of information, policymakers must realise the importance of maintaining a sufficient advertising share for the press.

This positive effect of this policy for the media – insofar as **its direct impact on the share of advertising funding for different media** - has also been recognised at EU level.

The European Parliament already pointed out in 1984 with regard to rules for advertising that such rules can also “[...] ensure that revenue is apportioned fairly between the public and private sectors and the various mass media, [...]”(European Parliament, Resolution on a policy commensurate with new trends in European television, OJ C 117/2002, 40.4.1984.

The European Commission also pointed out in its Green Paper “*Television without Frontiers – on the establishment of a common market mainly for broadcasting, especially by satellite and cable*” (COM(84) 300 final) with regard to the authorization of broadcast advertising: “*For the advertising industry, the main point is to make possible and simplify the planning of advertising and to make the use of advertising cheaper in supra-regional and cross-frontier broadcasts, [...]. For the broadcasting organizations, the main point is to allow the free flow of their advertising broadcasts and to secure their financial basis, which is dependent (or partly dependent) on advertising revenue [...]. For the press organizations, the main point is to maintain one of the main pillars of their activities and livelihood, namely their income from advertising.*” (Green Paper, p.268).

Question (18)

What regulatory instruments would be most appropriate to address the rapidly changing advertising techniques? Is there more scope for self/co-regulation?

ENPA and EMMA believe that self-regulation contributes to growth and innovation, while providing a means for the industry to ensure that public interest values are met. Self-regulation has proven to be a flexible and effective instrument, as an alternative to regulation in the field of commercial communications. We therefore believe that it is the most appropriate tool to address rapidly changing advertising techniques and can be applied effectively to the new digital arena. The flexibility of self-regulation enables industry to adapt the scope and content of its codes of conduct quickly and easily, to take into account the development of new advertising practices and to respond best to consumers’ and political demands.

For example, a cross-industry standard on online behavioural advertising (OBA) was developed following the increasing use of this advertising practice in Europe. The OBA standard, developed by the whole Internet value chain and in coordination with the European Commission and consumers’ organizations, ensures transparency, choice and control for consumers. While the framework is European, the standard is enforced at national level by advertising and self-regulatory organisations, and information is available to all EU citizens via national information websites. Recently, information campaigns have been launched across Europe to empower Internet users. They raise awareness of the existence of OBA and of the possibility to switch off this service. We think that the development of voluntary industry commitments such as the OBA standard shows the advertising industry’s responsibility and offers a balanced approach which best addresses consumers’ concerns, while preserving the economic and social potential of new advertising techniques.

As regards the question of who should decide on whether there are commercial overlays or other novel techniques on the screen, we believe that this is a matter of consumer choice. In this regard, it should be noted that users are likely to stop using services which deploy annoying or unwanted techniques.

Comment 4: Protection of minors

Question (20)

Are the current rules of the AVMSD appropriate to address the challenges of protecting minors in a converging media world?

We believe that self-regulatory mechanisms that are in place for the press sector, such as press councils and advertising codes, represent the right approach to protect minors - also in a converged audio-visual world. Legislation that would interfere with i.e. press articles' content would severely damage press freedom and should be avoided.

To further improve the protection of minors in the digital era, we believe that it would be most constructive to focus on the take up of parental control tools. Many options already exist for the different devices to hinder children from being exposed to unsuitable content and services. In the framework of the 'Coalition to make the Internet a better place for kids', leading technology and media companies are developing voluntary commitments to make it safer for children to surf online. It is important to increase parents' awareness of the existence of such control tools. This could be done via e.g. the distribution of digital kits for parents in schools, the organisation of educational campaigns or references to these instruments in manufacturers' brochures.

A broad use of parental control tools and age verification mechanisms, jointly with the correct implementation of existing legislative and self-regulatory rules, would ensure that minors are protected from the various dangers of the Internet while being able to make full use of the wonderful opportunities it represents.

A wide range of magazine publishers publish specifically children or teenager-focused titles. In this context protection of minors is an integral part of running the publishing business. In most EU Member States the existing law in any case restricts editorial content provided to minors. European press publishers do not therefore see a need for the European legislator to act.

In addition, media literacy educational initiatives aimed particularly at young people (see response to question 14) can help to address the challenges of protecting minors in the media sphere.

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