

# MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

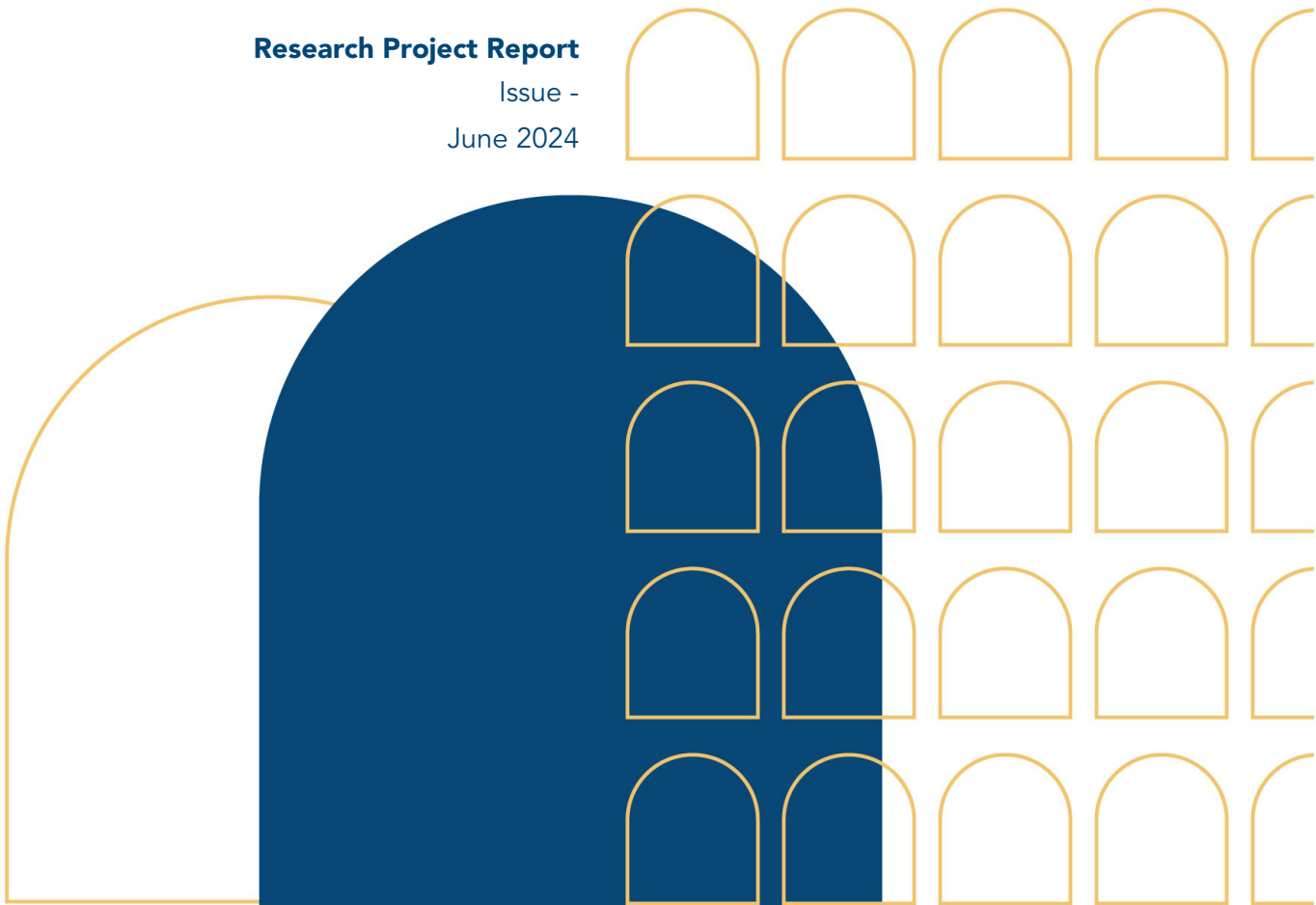
## APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN MEMBER STATES AND CANDIDATE COUNTRIES IN 2023

Country report: Denmark

Sandra Simonsen, Aarhus University - Department of Media and Journalism Studies

**Research Project Report**

Issue -  
June 2024



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Published by  
European University Institute (EUI)  
Via dei Roccettini 9, I-50014  
San Domenico di Fiesole (FI)  
Italy  
ISBN:978-92-9466-562-1  
doi:10.2870/476567



**Co-funded by  
the European Union**

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or EACEA. Neither the European Union nor the granting authority can be held responsible for them.

# 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 2023. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This year a part of the MPM has also been piloted in Bosnia and Herzegovina and Moldova. 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. The research is based on a standardised questionnaire that was developed by the CMPF.*

*In Denmark the CMPF partnered with Sandra Simonsen (Aarhus University - Department of Media and Journalism Studies), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert. Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).*

- **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.

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
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

- **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. 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/>.

**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, MPM2024 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 MPM2024, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

## 2. Introduction

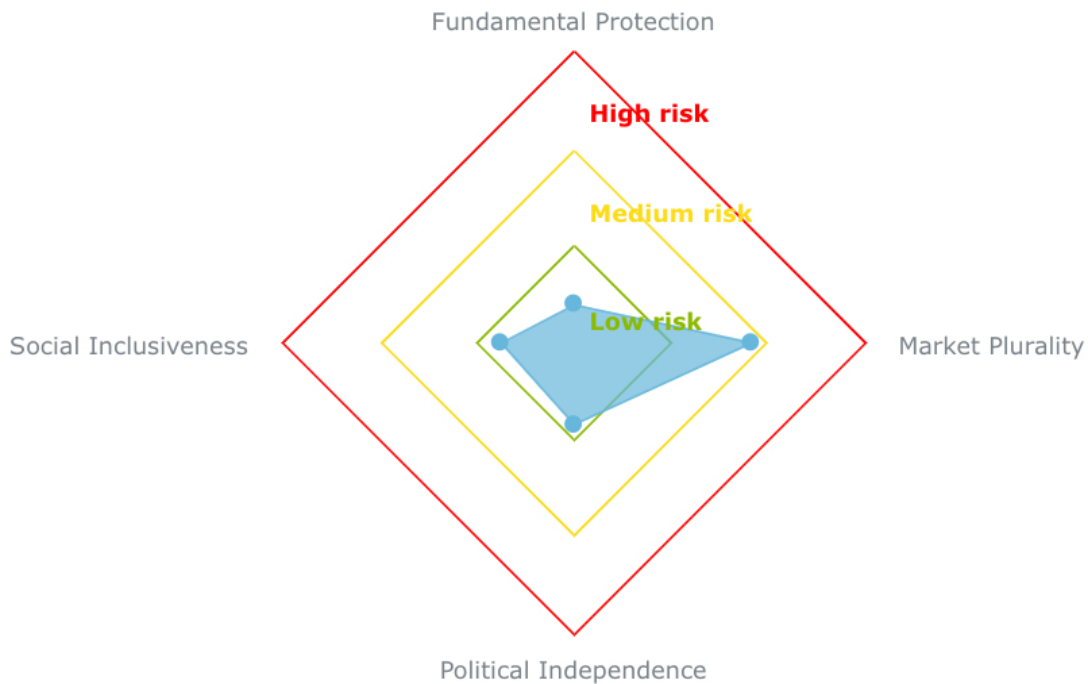
- **Country overview.** Denmark is a small Scandinavian nation. It has around 5.9 million residents and spans an area of 42,925 square kilometers (Danmarks Statistik, 2024a).
- **Languages.** The primary language spoken in Denmark is Danish, closely linked to and sharing similarities with Swedish and Norwegian. Within the Kingdom of Denmark, Greenland (where Greenlandic is spoken) and the Faroe Islands (where Faroese is spoken) have established their own official languages (Law on Greenland's Autonomy 2009; Law on Faroese Home Rule 1948).
- **Minorities.** In Denmark, ethnic minorities make up 15% of the population. The largest group hails from Turkish descent (approximately 60,000 individuals), followed by Syrians (around 40,000 individuals) and Iraqis (32,000 individuals). Other significant minority groups include citizens from Ukraine, Lebanon, Pakistan, Bosnia-Herzegovina, Iran, Somalia, Afghanistan, and Vietnam. Despite these diverse demographics, Denmark remains predominantly a socially and culturally homogeneous society (Danmarks Statistik, 2023 pp. 7, 14-16).
- **Economic situation.** Denmark stands as a financially robust and steadfast welfare state, supported by a progressive tax system and principles of equalization. The welfare framework extends across all public services, encompassing healthcare, education, childcare, elderly and disabled care, support for disadvantaged citizens, pensions, and public welfare, among others. Denmark's Gross National Product (GNP) for 2023 totaled approximately 98.242 billion EUR, marking a 1.8% increase compared to 2022 (Danmarks Statistik, 2024b). Inflation in 2023 stood at 3.5%, roughly half the rate observed in 2022 (The National Bank, 2023).
- **Political situation.** Denmark operates as a constitutional monarchy, featuring a stable parliamentary multi-party system. While minority governments have been prevalent historically, the current government holds a majority. The political landscape is distinguished by a robust tradition of inter-party collaboration. Crucially, significant labor market matters are addressed through tripartite negotiations involving the government, employers' associations, and labor unions.
- **Media market.** The media landscape in Denmark is characterized by a blend of private newspapers and significant state involvement in audio-visual media. Comprehensive media support schemes exist for both state-owned and private media outlets, distributed in a transparent and equitable manner. Notably, Denmark has managed to avoid issues concerning politically-affiliated business owners assuming control of major media outlets for direct or indirect political influence. This success can be attributed to the substantial public service sector and the tradition of foundation ownership. A distinguishing feature of Denmark's media environment is the government's support for Danish media and cultural production. In the realm of print media, major newspapers reflect a diverse political spectrum and the country's political history. While print readership has declined, it remains relatively higher compared to other European nations (Willig, Waltorp, & Hartley, 2015). Most major Danish newspapers have implemented paywalls for online content, although none have witnessed online revenue growth significant enough to replace income from print. Additionally, these newspapers face stiff competition from tech giants like Facebook and Google for advertising revenue. In the audio-visual sphere, state domination is pronounced. The two largest television stations, Danish Broadcasting Corporation (DR) and TV2, are state-owned entities. DR, funded entirely by the state, holds a dominant

position in radio, television, and online platforms. TV2 operates on an advertising and subscription-based model and is renowned for its network of regional news stations, which receive public service funds. Digital. The prevalence of native digital media is notably significant, with 81% of Danish internet users utilizing online platforms for accessing news. Denmark has witnessed the rise of newspapers exclusively established online, including entities like Frihedsbrevet, Kontrast, Altinget, and Zetland. Prominent online news portals encompass DR, TV2, and major newspapers such as Berlingske, Ekstrabladet, and Politiken. Regulatory environment. In Denmark, the media landscape operates under self-regulating norms and overarching laws, with only a handful directly targeting the media industry. General legislation regarding defamation and monopolies also extends to media operations. The independent Press Council (Pressenævnet) issues a set of ethical standards for its members. While membership is voluntary, it's often a prerequisite for accessing support schemes. Denmark has adopted the EU's Audiovisual & Media Service Directive, which became effective on July 1st, 2022.

- **War against Ukraine.** Throughout 2023, the conflict involving Ukraine had significant repercussions, particularly in the realm of combating the dissemination of Russian disinformation tied to the war. This manifested in governmental actions, leading to the shutdown of certain websites deemed to be propagating misleading or false narratives.

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

#### Denmark: Media Pluralism Risk Areas



JS chart by amCharts



The three areas Fundamental Protection (13%), Political Independence (28%) and Social Inclusiveness (25%) are placed in the low-risk category. The area Market Plurality (61%) is however placed within the medium-risk category.

The area **Fundamental Protection** has obtained a low-risk assessment (13%) as basic freedom of expression and freedom of information is generally respected and incorporated into Danish laws and regulation. The same applies to other relevant variables such as, e.g., net neutrality. No arbitrary arrests, major violent attacks or killings of journalists were reported in Denmark in 2023, however threats from religious extremists places restraints to freedom of expression in practice. The biggest challenges with regards to Fundamental Protection in 2023 is the introduction of legislation aimed at preventing the improper handling or mistreatment of religious texts, essentially constituting blasphemy (The Danish Parliament, 2023).

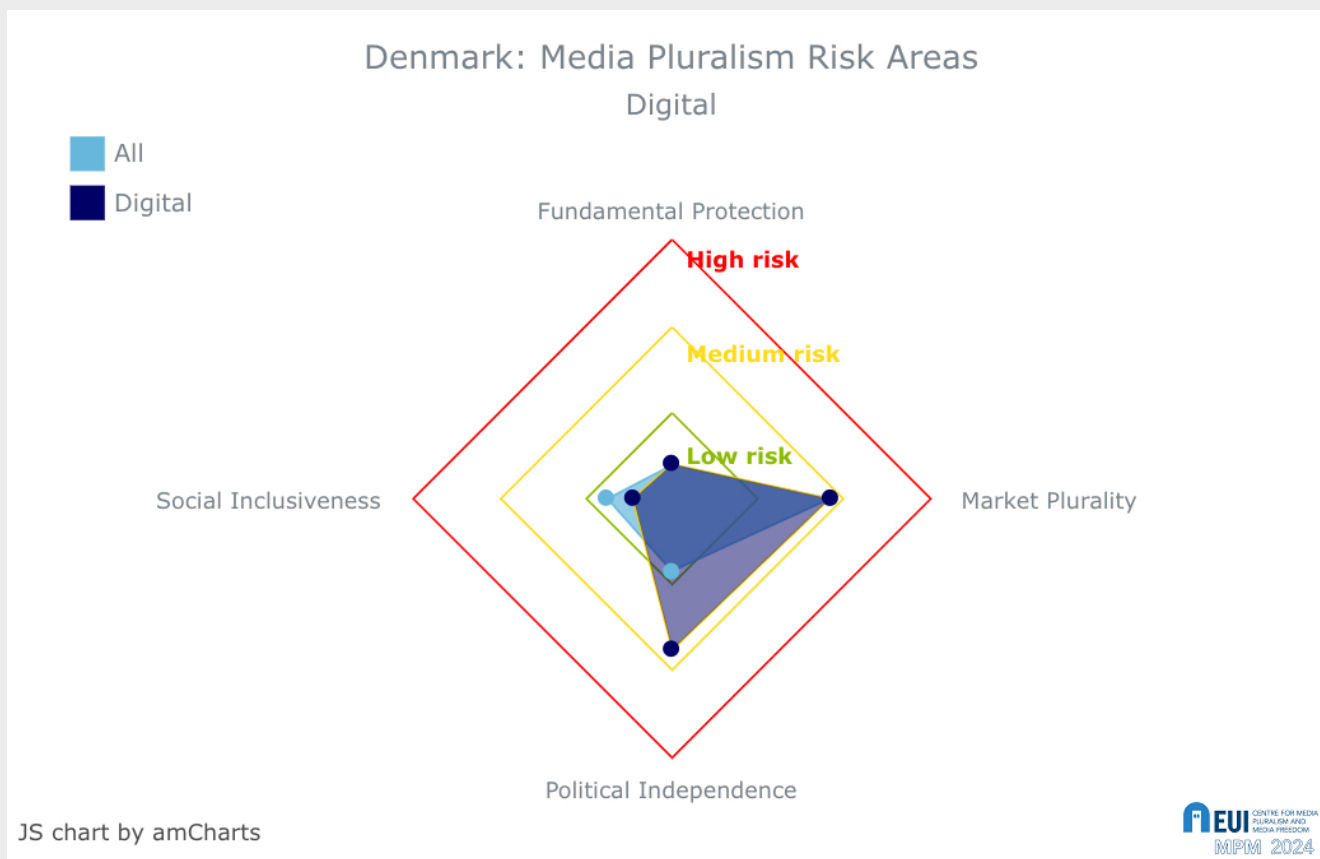
**Market Plurality** is assessed as having a medium risk level at 61%. The indicators Plurality of Media Providers and Plurality in Digital Markets are, however, posing a high risk with 83% and 72% respectively. These results primarily stems from the absence of specific regulations addressing concentration in the news media sector. Although Denmark has laws preventing market monopolization, they are not media-specific, which impacts the assessment for this domain. Additionally, there is a lack of regulations concerning editorial independence from market interests. However, in practice, cultural norms and informal social rules play a significant role in governing this aspect. The dominance of state media such as DR and TV2 further contributes to high market concentration. Nonetheless, general anti-competition regulations, the CVR registry, and self-regulating bodies like The Press Council generally prevent violations in this regard (BEK nr 488, 18/05/2017; LBK nr 1952, 11/10/2021). Moreover, Denmark's strong institutional framework ensures market plurality due to its comprehensive competition laws.



**Political Independence** is deemed a low risk at 28%. As the political independence of the media is mainly guided by democratic culture, norms in media and non-explicit state rules of administration in Denmark, e.g. the principle of arms-length, there is a lack of explicit laws ensuring political independence thereof and that fact might skew the results for this area. These conditions are the primary reason the indicator Political Independence of the Media received a medium-risk score of 50%, as in practice there is no political control over the media, be it audiovisual, printed, or online, in Denmark, according to assessments by Journalists without Borders and Freedom House (Journalists without Borders, 2023; Freedom House, 2023). Editorial autonomy (25%) is in Denmark relatively strong, and so is State regulation of resources and support to the media sector (3%). There is no issue with Audio visual media, online platforms, and elections (31%), in spite transparency on online strategies and ad spending could be better. Public service media act independently (29%), and is experience overall no political interference.

**Social Inclusiveness** (25%) is associated with a low risk. This result is in line with the previous implementation of MPM, where Social Inclusiveness reached a 31% risk score and was also placed in the low-risk category. One indicator is associated with a medium risk, namely Representation of Minorities in the Media, with a score of 46%. This result is primarily due to a lack of news in minority languages, and the absence of specific right with regards to allocation of airtime to minorities. However, the PSM have comprehensive diversity policies, and report on initiatives in their annuals reports. The gender representation in the management boards of the PSM and of private media outlets is balanced.

## Focus on the digital environment



With regards to the digital aspects of the four areas, two are placed within the low-risk category, namely **Online Fundamental Protection** (13%) and **Online Social Inclusiveness** (15%). **Online Market Plurality** (61%), and **Online Political Independence** (58%) have both obtained a medium-risk assessment.

**Online Fundamental Protection** (13%) is within the low-risk category. Freedom of expression is safeguarded by the Danish constitution and extends to the online realm as well as any other medium. In general, the Danish government refrains from arbitrarily filtering, monitoring, blocking, or removing online content. However, when content is prohibited, it is done so based on transparent criteria. Denmark has enacted several data retention laws, including the Data Protection Act of 2018 and the Personal Data Act of 2000. Both of these laws align with Article 8 and 10 of the European Convention on Human Rights (ECHR). For instance, the Personal Data Act stipulates in Section 2 that "The law does not apply if it would be contrary to the freedom of information and expression, cf. Article 10 of the European Convention on Human Rights." Similarly, Section 3 of the Data Protection Act states that "The law and the data protection regulation do not apply if it would be contrary to Article 10 of the European Convention on Human Rights or Article 11 of the Charter of Fundamental Rights of the European Union."

**Online Market Plurality** (61%). The medium-risk assessment in this area primarily stems from the absence of specific jurisdiction addressing market plurality in the digital sphere within Denmark, and to a certain degree also the economic viability of online media outlets and the level of market concentration. In Denmark, regulations apply universally across all media sectors, and lacks specific requirements for the digital media sector, for example, concerning the disclosure of ownership details

or financial reporting. However, digital media entities are subject to general financial reporting obligations and transparency laws applicable to companies. Registration at the Ministry of Business is mandatory, and information is accessible to the public. Similarly, regulatory measures to mitigate excessive concentration in the digital media sector are not explicitly defined.

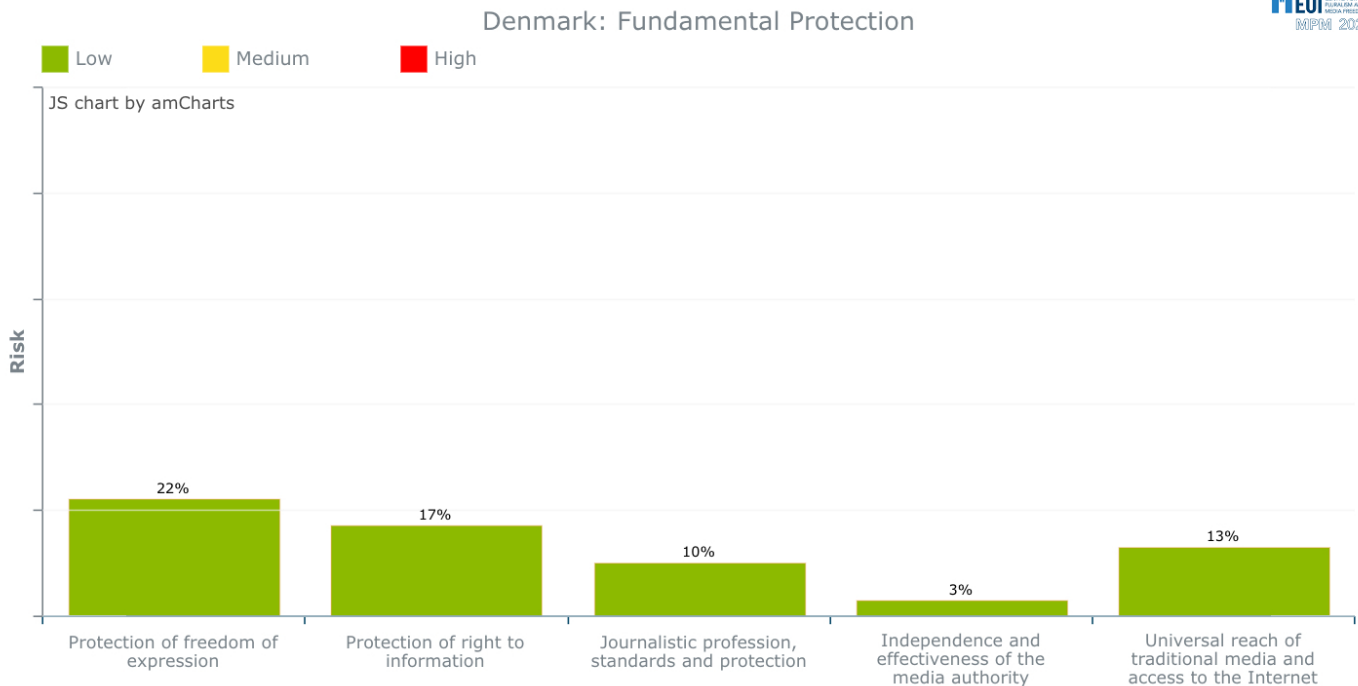
**Online Political Independence** (58%) receive a medium-risk score. Digital media platforms, whether privately owned or public service media (PSM), generally operate without direct or indirect political influence. Specific legislation targeting the digital media realm to safeguard democracy and prevent political entities from dominating through opaque political advertising is lacking. This absence could be attributed to the influence of democratic informal norms in Denmark, rendering explicit legislation unnecessary. Additionally, universal jurisdiction often governs areas without specific legislative frameworks.

For instance, regulations concerning political parties, candidates, and electoral lists reporting campaign expenditures on online platforms adhere to universal rules ensuring transparency. Laws such as the Party Accounting Act (*partiregnskabsloven*) and the Party Support Act (*Partistøtteloven*) outline requirements for disclosing funding and financial contributions. Moreover, the Law on Marketing §6 prohibits all deceptive advertisements, including political ads during elections, across media platforms other than television. While the radio and television laws solely address political advertisements on TV, social media and other platforms fall under the purview of the Law on Marketing.

The area of **Online Social Inclusiveness** (15%) receives a low-risk score. Such score is 10 percentage points lower than the overall risk assessment of this area. While experts on hate speech recommend more content moderation on social media, more direct legislation aimed at tackling hate speech might interfere with freedom of speech. Therefore, this area is characterized by some dilemmas. Particularly, strict community guidelines on social media - Facebook in this particular case - might de facto be an infringement of national civil rights (Justicia, 2022). While there is no explicit prohibition on disinformation, collaborating with foreign intelligence and powers to manipulate public opinion is prohibited under the Law on Foreign Influence. However, this law does not specifically address non-state disinformation. Several non-governmental initiatives have been established to monitor and research disinformation in Denmark but no new ones in 2023.

### 3.1. Fundamental Protection (13% - 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.



In reaching a low-risk score of 13%, the **Fundamental Protection** of Media Pluralism and Freedom in Denmark is relatively strong. The result from 2023 showed a similar low risk score of 14%. None of the indicators measured are near the medium risk category, which is also in line with last year's result.

**The Protection of Freedom of Expression** (22%) is guaranteed by article 77 in the Constitution (LOV nr 169, 05/06/1953). However, this freedom is subject to limitations outlined in Danish criminal law under articles 266b and 267 (LBK nr 976, 17/09/2019), particularly concerning hate speech, threats, and defamation. Defamation cases are relatively infrequent in Denmark, carrying potential penalties such as fines and, theoretically, imprisonment. Freedom of expression is generally respected by authorities in Denmark, yet practical violations of this freedom occur, particularly instigated by specific segments of civil society, notably religious extremists, particularly Islamist and/or jihadist individuals and groups (Holterman, 2023). These groups possess both the means and the intent to employ violence to stifle free expression. Consequently, media outlets and individuals face considerable risks to their personal safety when attempting to publish critical or satirical content related to Islam. Danish Criminal Law, under Articles 266b and 267, outlines restrictions on freedom of expression, aligning with the anticipated limitations of Article 10(2) of the European Convention on Human Rights (ECHR). However, in 2023, Denmark introduced legislation aimed at preventing the improper handling or mistreatment of religious texts, essentially constituting blasphemy (The Danish Parliament, 2023b). The wording of this legislation is notably vague and ambiguous, rendering it challenging in practice to discern the boundaries of what constitutes "inappropriate" treatment.

The recognition of the **Right to Information** (17%) is not explicitly stated in the Constitution of Denmark. However, it finds acknowledgment in various national laws, such as The Danish Public Administration Act, The Danish Public Information Act, and the Danish Environment Information Act (LBK nr 988, 09/10/2012; LBK nr 145, 24/02/2020; LBK nr 1036, 18/08/2015). The Danish Public Information Act underwent revision in 2014, which was heavily criticized for increasing the difficulty of accessing information by facilitating government rejection of information requests, thereby impeding transparency (see Koch & Gottrup 2019). In 2023, the government announced its intention to further tighten the Danish Public Information Act. This tightening applies specifically to public servants such as police officers, nurses, and social security assistants, restricting the right to seek access to documents containing their full name and working conditions. In July 2021, the Danish Parliament enacted the Law on Protection of Whistleblowers (Loven om Beskyttelse af Whistleblowere, 2021) to comply with EU Directive 2019/1937. According to the latest data, in the period from 17 December 2021 to and including 31 December 2022, the National Whistleblower Scheme received a total of 116 reports (Whistleblower, 2023).

In Denmark, the indicator measuring the **Journalistic Profession, Standards, and Protection** (10%) generally demonstrates strong performance. The Press Council (Pressenævnet) serves as a public, self-regulatory body responsible for addressing complaints concerning the news media, primarily regarding adherence to journalistic ethical principles. The "Danish model" ensures that journalists, akin to many other professions, benefit from robust unions and a comprehensive social security system. Members of the Danish Journalist and Media Union earn an average salary from 30,000 to 45,000 KR. The latest numbers for the unemployment rate for journalists in Denmark is approximately 6% (Danish Union of Journalists, 2023a), which is, however, a slight increase from last year. In 2023, there were no reported physical attacks on journalists. However, the Danish Jewish journalist Jotam Confino has received, every day during the Israeli war against Hamas, an extensive amount of death threats from individuals from the Muslim minority in Denmark (TV2, 2023). The Union of Danish Journalists reports an increase in harassments including threats (Danish Union of Journalists, 2023b). Denmark lacks a dedicated legal framework specifically addressing SLAPP (Strategic Lawsuit Against Public Participation) cases. However, there is no recorded instance of SLAPP cases in the country. Lawsuits against the media are uncommon in Denmark (Index in Censorship, 2023).

The risk related to the Independence and effectiveness of the **Media Authority** (3%) is rated relatively low mainly because of the strict legal framework regulating its operations. The Media Authority comprises The Radio and Television Board, The Media Council, and The Press Council, with their responsibilities, sanctions, and appeals clearly defined in legislation (LBK nr 410, 02/05/2006; LBK nr 914, 11/08/2014; BEK nr 152, 19/02/2014). The Media Council is specifically responsible for evaluating age-appropriate content and providing guidance on digital media for young audiences. However, appointments to the Radio and Television Board are not entirely independent from political influence. With eleven members, eight are appointed by the current Minister of Culture, while the remaining three represent interest groups such as unions and accessibility experts (The Ministry of Culture, 2023). Despite this political involvement, the board's independence from government control remains intact.

The **Universal Reach of Traditional Media and Internet Access** indicator also presents a low risk (13%). The Public Service Act (LBK nr 248, 16/03/2019) ensures universal coverage of public service media. With access to Danmarks Radio (DR) available via internet connection, and 99% of households having access to internet speeds of at least 2Mbit/s (Danish Energy Board, 2020), both traditional and internet access can be considered universally available in Denmark.

## Focus on the digital environment

The conditions of **Online Fundamental Protection** in Denmark are relatively good. There is a minor risk regarding FoE on online (social) media platforms, in spite the Danish legislation treats online and offline spaces equally. FoE is aligned with global and regional human rights norms. However, the legal think tank Justitia released a report in 2022 highlighting issues regarding somewhat excessive moderation of comments on the Facebook pages of Danish news media (Justitia, 2022), which has led to concerns about online censorship. This has sparked arguments that freedom of expression is facing challenges (Mchangama, 2023). In 2023, Danish People's Party politicians Mikkel Bjørn and Morten Messerschmidt raised concerns to Prime Minister Mette Frederiksen regarding Facebook's perceived censorship, particularly regarding criticism of immigration. They questioned whether the government sees this as a democratic and societal issue and if they intend to discuss it at the upcoming European summit, possibly leading an international effort to urge Facebook to respect freedom of expression (The Danish Parliament, 2023a).

Overall, the Danish government avoids arbitrarily filtering, monitoring, blocking, or removing online content. A website may only be blocked if there is a reasonable suspicion that it is involved in violating specific sections of the Criminal Code, namely §§ 114-114i, 119, or 119a (Danish Ministry of Justice 2017). The decision to block a website is made by a court upon receiving a request from the police. The Danish Teledata Industri organization maintains a roster of prohibited webpages. A court order is generally required for webpage bans. The list of blocked pages by the Teledata Industri Organization can be accessed through this link: <https://www.teleindu.dk/brancheholdninger/blokeringer-pa-nettet/> In Denmark, there are several laws regarding data retention, notably the Data Protection Act of 2018 and the Act on Personal Data of 2000. Both laws are in accordance with Articles 8 and 10 of the European Convention on Human Rights (ECHR). For instance, Section 2 of the Act on Personal Data specifies that the law does not apply if it conflicts with the principles of freedom of information and expression outlined in Article 10 of the ECHR. Similarly, Section 3 of the Data Protection Act states that the law and data protection regulations do not apply if they contradict Article 10 of the ECHR or Article 11 of the Charter of Fundamental Rights of the European Union.

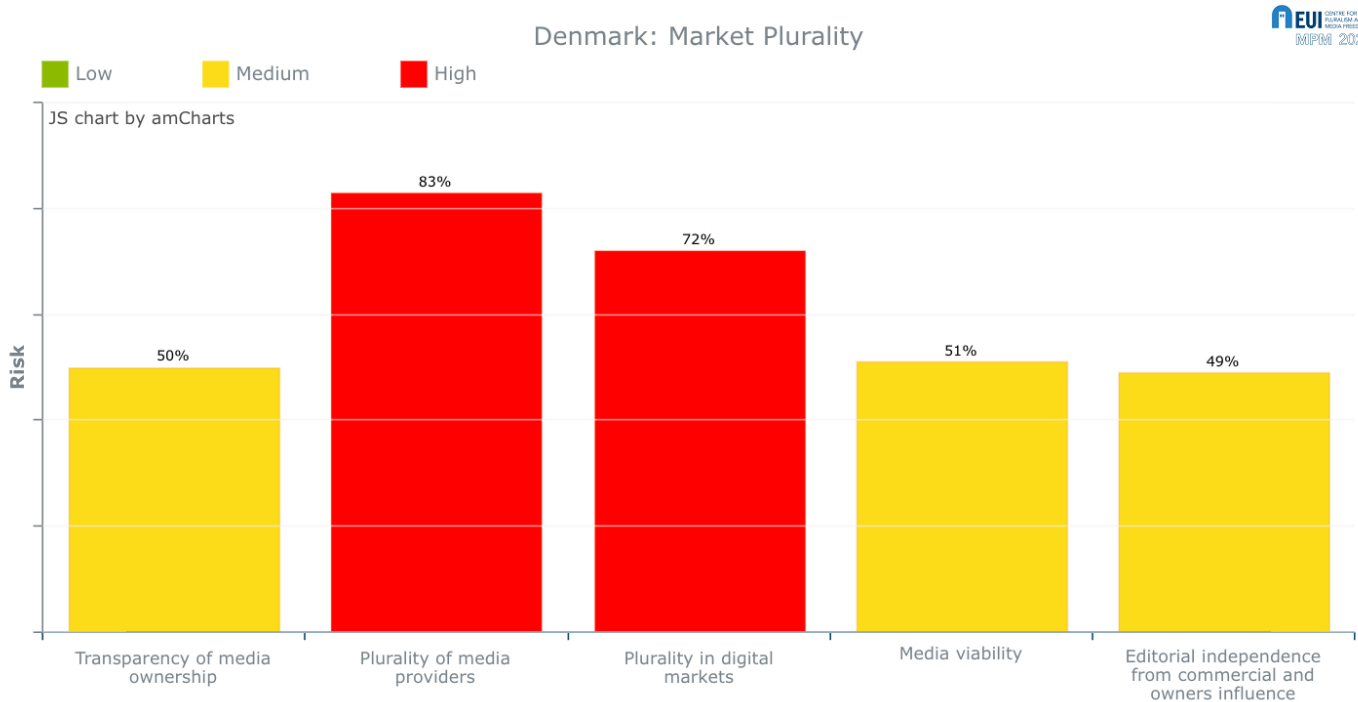
Denmark has also taken steps to prevent unauthorized surveillance of journalists or media service providers and their families by state authorities. For example, Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 was incorporated into Danish law in 2017 through the Act on the Processing of Personal Data by Law Enforcement Authorities (Act No. 410 of 27/04/2017). The General Data Protection Regulation (GDPR) was implemented through national legislation in 2018, in conjunction with exceptions provided for in the GDPR regarding freedom of expression and journalistic activities, in line with Article 10(2) of the ECHR, thus ensuring the appropriate safeguarding of journalistic freedom. In 2018, Denmark has implemented through national legislation the derogation provided for the GDPR on freedom of expression and journalistic activities in a way that complies with article 10(2) of the European Convention on Human Rights (Datatilsynet, nd.) With regards to threats to journalists online, there is no data from 2023, however the latest data from 2020 indicates that 25% of the participants in the study have experienced digital harassment (Danish Union of Journalists, 2020).

In Denmark, there is close to universal reach of traditional media and access to the internet. 97.7% of households are covered by broadband, and 96% of households have a broadband subscription. The Danish Agency for Data Supply and Infrastructure hosts a net neutrality forum which yearly publish

an annual report on the conditions of net neutrality. According to this forum, there is no issues with transparency, impartiality and neutrality, and no discriminating against particular types of content or content from particular sources (Danish Agency for Data Supply and Infrastructure, 2022b).

### 3.2. Market Plurality (61% - 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).



The risk level to **Market Plurality** in Denmark stands at 69% and is categorized as medium. The medium risk score aligns with the 2023 assessment, where Market Plurality also received a medium risk score of 59. However, the increase by 10 percentage points is attributed to the lack of updated data for 2023. The consistency between the years, on the other hand, is primarily due to similar factors (cultural norms, and non-media-specific regulations, and a general lack of consistent updated data), which may exaggerate the risks to market plurality in Denmark beyond actuality.

Scoring at a medium risk level, **Transparency of media ownership** (50%) may be explained by the absence of specific provisions in Danish law pertaining to the media sector regarding the disclosure of media ownership. Moreover, there are also no requirements in Danish legislation mandating media outlets to disclose financial details. However, transparency of media ownership as well as the disclosure of financial details falls under general laws governing transparency of ownership, such as BEK no. 488 of May 18, 2017. This encompasses company laws necessitating public disclosure of actual owners, both individuals and entities, with direct and indirect voting power or shares. This information is regularly updated, as required by EU laws on European companies. In Denmark, information regarding company ownership, including media entities, is publicly accessible. Every business and owner must register with the Ministry of Trade to obtain a CVR (Central Business Register) and tax identification number. Violations of these laws incur fines from the Ministry, with the relevant information published on an official website. These regulations ensure that media company ownership in Denmark remains transparent and available to the public.



The high risk score of **Plurality of Media Providers (83%)** is mainly due to a lack of media specific rules to prevent or limit concentration in the media sector, both horizontal and cross-media. In Denmark, the media sector is regulated by the same competition laws as any other company in Denmark (LBK nr 155, 01/03/2018). The law on competition gives the Competition Council clear mandate to sanction in forms of fines or actively prohibiting mergers. It is important to note that in a Danish context, the newspaper market is quite pluralistic, with a variety of major newspapers competing with each other. According to the European Audiovisual Observatory Dataset 2023, the audience concentration of the Top 4 audiovisual media owners in Denmark stands at 96%. This comprises TV2 (53%), DRTV (28%), Viaplay Group (11%), and Warner Bros. Discovery (4%). Regarding radio listenership, the Danish Broadcasting Corporation holds a significant share of 76%, measured by time spent listening. The following radio stations are NOVA (4%), Radio Soft (2%), Classic FM (1%), and Radio 4 (1%) (Ministry of Culture, 2023). Moving to newspapers, the readership concentration among the Top 4 newspaper owners, including Jydsk Fynske Medier, Berlingske Media, JP/Politikens Hus, and Bonnier Group, is at 37% (Kantar Gallup 2023). For online news, the readership concentration among the Top 4 online media outlets in Denmark (Ekstrabladet, BT, DR, and TV2) is reported at 63% (Gemius 2023).

The high-level risk to **Plurality in Digital Markets (72%)** stems from several factors. Firstly, there's a notable absence of digital and media-specific legislation aimed at safeguarding plurality. For example, the law on competition, applies to all sectors and there exist no laws specific to digital media corporations, and that affects the risk score for this area. There is, similarly, no administrative authority or judicial body (e.g. media authority) specific to the digital media sector. The Competition and Consumption Authority has sanctioning authority, but again, it applies to all sectors and not just digital media companies (Konkurrenceloven §22-23). Furthermore, the scarcity of data regarding audience shares on digital media platforms complicates assessment. Unfortunately, there hasn't been any updated data on market shares since the Danish Competition and Consumer Authority's 2020 report, which shows that Google and Facebook accounts for around 50% of the total turnover in online channels in 2019. Facebook contributes approximately 14%, while eBay is estimated to contribute around 9% through its marketplaces like dba.dk and bilbasen.dk. Local daily newspapers, local media, magazines, and TV channels collectively represent about 15% of the online advertising market (Danish Competition and Consumer Authority, 2020). In terms of audience shares, the top four online players in the media market are Ekstra Bladet (502,839,463 page views), BT (382,984,859 page views), TV2 (216,466,241 page views), and DR (143,241,188 page views) (Toplisten, 2023). The recent copyright law in 2023 can be interpreted as regulating competition within digital media. It enhances negotiation capabilities and enables collaboration amongst digital media. Approved in June 2021, the new copyright bill primarily aimed to implement Directive (EU) 2019/789 and parts of Directive (EU) 2019/790, addressing the modernization of copyright in light of digital technology developments, particularly access to copyrighted material via the Internet. This law has notably granted publishers copyright protection, strengthening their position. The Danish Competition and Consumer Authority has established the Center for Digital Platforms within its organization. The center's objective is to oversee digital media and enforce competition laws in this domain, with a specific emphasis on digital responsibility (See the Danish Competition and Consumer Authority's Goal and Result Plan 2020, p. 7). In 2021, a large number of Danish media houses founded the Danish Press Publications Collective Management Organisation (DPCMO). The association seeks to enter into agreements with providers of information society services and online content sharing services with a view to ensuring a lawful use of the publishers rights according to the Copyright Act 52 c and 69 a. In October 2023, the Ministry of Culture has approved DPCMO as a collective management organization authorized to conclude agreements regarding press publishers rights on behalf of the publishers. The EU Copyright Directive was transposed into Danish law in 2023 (Ministry of Culture, 2023). Denmark's overarching fiscal system currently encompasses the

taxation of digital services. However, the practical implementation of this taxation framework reveals a variety of methods employed to circumvent tax obligations. The complexities inherent in the digital economy pose challenges for traditional tax frameworks. The EU directive on minimum taxation was transposed into Danish law in December 2023 (Ministry of Finans, 2023).

**Media Viability** receives a medium risk score (51%). Statista (2023a) reports an increase in ad revenues for the TV/Video segment from 2022 to 2023. Additionally, Mediavision's analysis suggests continued revenue growth in the TV and streaming market in the Nordics, fueled by a shift towards streaming over traditional TV (Frederiksen, 2023). TV2 demonstrates consistent growth, as indicated by recent data (Statista, 2023b). The Danish Broadcasting Corporation's annual report indicates a stable economy over the active contract period (DR, 2022: P. 10). In the radio sector, Danske Medier Research (2023) notes a slight revenue increase from 2021 to 2022, from 371 million to 375 million kroner. However, WARC's data indicates a decrease from 337.8 in 2022 to 324.9 in 2023 (WARC, 2024). Regarding newspapers, according to Danske Medier (2024), advertising revenues of newspapers and magazines have significantly decreased in 2022 and 2023. Statista (2023c) reports an increase in ad revenues from 2022 to 2023, despite a decline in revenue in the second quarter of 2023 compared to the same period the previous year. There are signs of a decline in the number of local media outlets in Denmark, with Jysk Fynske Medier announcing the closure of 11 out of 53 weekly newspapers in 2024 due to advertising market challenges (Lange, 2023). Although comprehensive data is from 2021, it shows a 25% closure rate of local newspapers and editorial offices between 2011 and 2021 (Østerby, 2021). Government subsidies, notably from the Danish Broadcasting Corporation and TV2, significantly support local news media in Denmark, enhancing their sustainability compared to market competition. While initiatives for alternative funding sources exist, major outlets predominantly rely on new revenues. Innovative approaches are primarily seen in newer and smaller outlets like Kontrast, Zetland, and Frihedsbrevet, aiming to foster community and cater to specific identity groups. Recent unemployment figures show an increase in unemployment among journalists and communicators since May 2023, with 2,000 individuals affected by unemployment in August 2023, equivalent to six percent full-time unemployed (AJKS, 2023). Danish media remains heavily reliant on state support, with nearly all major news outlets receiving public funding, considered a cornerstone of the news media industry.

As in the MPM of 2023, **Editorial Independence from Commercial and Owners Influence** (49%) obtains a medium-risk assessment. This area is primarily governed by norms and self-regulation rather than formal legislation; certain protections that the CMPF is looking for in the MPM methodology do not exist in Danish law or self-regulation which accounts for the medium risk level observed (even if the risks did not materialise). The Press Ethical Rules, established by the Danish Union of Journalists, afford journalists certain editorial freedoms and are upheld by The Press Council, a public, self-regulatory body handling cases of journalistic misconduct and suspected censorship (Pressenævnet, n.d.). However, membership in the Press Council is voluntary, but membership is a prerequisite for accessing state support schemes, ensuring widespread acceptance. Aligned with Denmark's tradition of labor unionization, the Danish Union of Journalists provides significant job protection for journalists, though editors negotiate contracts individually with media owners. The Consumer Ombudsman oversees journalistic practices, particularly concerning transparent advertising practices. The Danish Marketing Act expressly prohibits hidden advertisements, both online and offline (LBK nr 1216, 25/09/2013). Overall, Danish media maintains editorial independence from commercial influences, but concerns have arisen regarding paid content, resembling editorial material in design and placement. While guidelines set forth by the Association of Danish Media are largely adhered to, there's no explicit legislation or self-regulatory schemes mandating disclosure of potential conflicts of interest among media owners that may impact editorial content.

## Focus on the digital environment

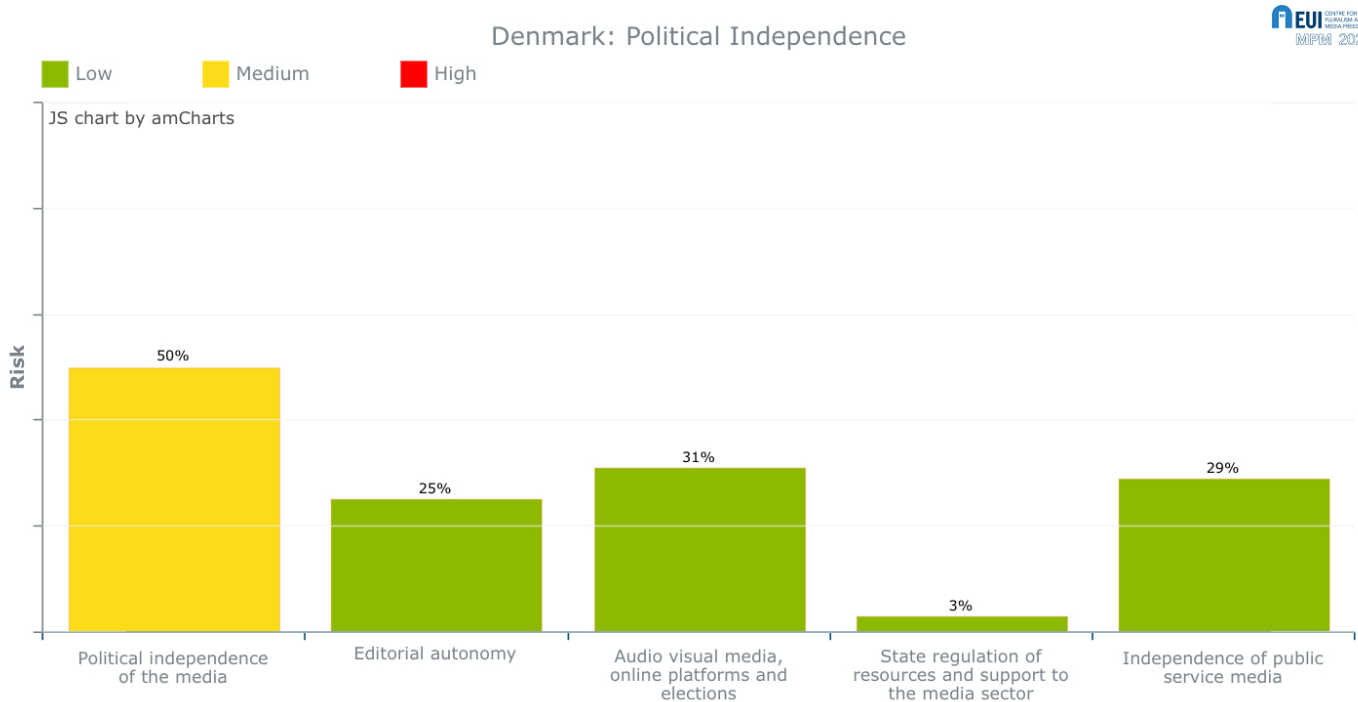
**Online Market Plurality** reaches a medium risk assessment (61%). That is due to a relatively low score in digital Media Viability that compensates for a relatively higher score in digital Transparency of Media Ownership.

In Danish national law, specific provisions mandating the disclosure of ownership details within the digital media sector are absent. However, the media sector falls under general financial reporting obligations and transparency laws for companies. Registration with the Ministry of Business is obligatory for all companies, including digital media entities, to obtain a CVR number and tax registration, with this information being publicly available on [www.virk.dk](http://www.virk.dk) (Selvskabsloven §32-§36, §58). Likewise, there are no distinct obligations for financial documentation within Danish law concerning online media companies, with these entities also subject to general financial documentation obligations and transparency laws for companies. Again, registration with the Ministry of Business is mandatory, and financial information is publicly accessible (Ibid.). Transparency regarding ultimate ownership in the digital news media sector is not explicitly addressed in Danish law. Instead, these entities are governed by general transparency laws for companies, requiring registration with the Ministry of Business for public accessibility of information (Selvskabsloven §32-§36 §58 and §36). Regulatory measures specifically aimed at preventing high degrees of concentration in the media sector, especially concerning digital media, are lacking in Denmark. However, enforcement of general competition rules could potentially mitigate a high degree of ownership concentration. While Danish competition law encompasses all businesses, including media and digital outlets, there's a notable absence of specific references to digital media. Nonetheless, the new copyright law, enacted in June 2021, can be interpreted as addressing competition within the digital media landscape by bolstering publishers' copyright protection. Moreover, the Danish Competition and Consumer Authority has established the Center for Digital Platforms to supervise digital media and enforce competition laws, particularly focusing on digital responsibility (Danish Competition and Consumer Authority's Goal and Result Plan 2020, p. 7). While no specific laws regulate advertising on digital media, the Danish Competition and Consumer Authority oversees competition law, although fines have not been imposed on dominant actors like Google or Facebook (Konkurrenceloven §11). The authority has the power to enforce competition rules with sanctions such as fines and imprisonment (Konkurrenceloven §22-23).

With regards to online media viability, data on the advertising revenues of online media indicates a decrease. Following the post-Covid rebound from 2021 to 2022, there's a decline from 3.629 million to 3.378 million kroner (Dansk Online Index, 2023). However, since other revenue streams such as subscriptions, donations, etc., remain unknown, it isn't possible to determine whether the overall revenues of digital media or digital natives increased or decreased. It is primarily newer and minor outlets such as Kontrast (<https://kontrast.dk/>), Zetland (<https://www.zetland.dk/>), and Frihedsbrevet (<https://frihedsbrevet.dk/>) that have developed alternative funding sources, such as membership- and community-strategies, demonstrating real innovation and initiative. These outlets aim to create a sense of community through membership events and directly target identity-groups such as conservatives, skeptics, intellectuals, etc. Several online media outlets receive state subsidies (see the list here: <https://lokalavisen.dk/samfund/ECE14878474/se-listen-saa-mange-mediestoettemillioner-faar-danske-medier-af-staten-i-2023/>).

### 3.3. Political Independence (28% - 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 level of risk to **Political Independence** in Denmark is with 28%, low. Overall, the results of the Political Independence area stems from low-risk scores in the indicators Editorial Autonomy, State Regulation of Resources, Audio Visual Media, Online Platforms and Elections, and Independence of Public Service Media. The indicator that reach a medium risk score, and so might be a cause of targeted attention in the future, is Political Independence of the Media. The low-risk score of Political Independence is in line with the result from the MPM2023, in which this area similarly reached a low-risk score of 31%. The consistency in results regarding Political Independence between the years backs up the conclusion, that the political independence of the media sector is strong in Denmark.

The indicator **Political Independence of the Media** (50%) has been assessed as posing a medium risk. However, according to assessments by Journalists without Borders and Freedom House (Journalists without Borders, 2023; Freedom House, 2023), there is in practice no political control over the media, be it audiovisual, printed, or online, in Denmark. The medium risk assessment primarily stems from the trust and norm-based nature of Denmark's media regulatory framework, resulting in a lack of formal and explicit rules and regulations forbidding political control of media outlets. For instance, there is no specific legislation prohibiting politicians or political parties from owning media companies. Yet, the only two instances where media outlets were owned by political parties include Frihedens Stemme, operated by Stram Kurs (Hardline), and ditoverblik.dk, formerly run by Dansk Folkeparti (The Danish People's Party). While major newspapers in Denmark, like Berlingske and Politiken, may adopt ideological standpoints in their editorials, news coverage and framing, they do so without direct influence from political actors. This is largely attributed to the historical background of these newspapers, which initially emerged as party newspapers

before transitioning into independent journalism (Willig, et al., 2015). Denmark has a longstanding culture of press freedom and editorial independence, spanning many decades (Blach-Ørsten et al., 2021).

**Editorial Autonomy** (25%) in Denmark is assessed as posing a low risk, indicative of its robustness. The editorial content within both Danish print and digital news media is effectively independent of political influence. Although the political independence of editors and editors-in-chief is not legally protected, any violation of this autonomy would face social sanctions. The Press Council serves as a self-regulatory body, utilizing ethical guidelines to address various forms of journalistic misconduct. While some may argue that a self-regulatory mechanism may not suffice in safeguarding editorial autonomy, it has been a cornerstone of Danish news media for many years and is deemed effective (Blach-Ørsten et al., 2021). Despite its independence, the Press Council has been endowed with certain powers by the state under the Media Responsibility Act. For instance, as per § 49 of the Act, the Press Council possesses the authority to mandate a media outlet to publish the board's decision and furnish a summary of the ruling if it breaches the Council's ethical principles. In essence, this empowers the council to both establish standards for ethical press practices and adjudicate on violations thereof.

The assessment of the indicator concerning **Audio Visual Media, Online Platforms**, and Elections (31%) ranks as the second highest within this domain, yet it is still categorized as low-risk. According to the Radio and Television Law, public service media are explicitly mandated to uphold freedom of expression and information (LBK nr 248, 16/03/2019: §10). Additionally, public service contracts established between the government and entities such as The Danish Broadcasting Corporation and TV2 include provisions requiring political impartiality and unbiased news coverage. Notably, political commercials are prohibited on traditional broadcast television under §76 of the Radio and Television Law, encompassing all political parties, labor unions, as well as religious and political movements. However, this legislation does not extend to online media, leading to significant implications as many Danish politicians, spanning the political spectrum, allocate substantial resources towards advertisements distributed on social media platforms. Despite this, there remains a paucity of research and data concerning transparency in online political contexts.

Overall, it is assumed that no egregious malpractices are occurring due to the existence of robust legislation and a cultural ethos ensuring equitable representation of all political parties during election periods. Nevertheless, it is pertinent to mention three general laws pertinent to this context. Firstly, §10 of the Law on advertisement (Markedsføringsloven) stipulates that advertisers must obtain consent from consumers, and advertisements must be clearly identifiable as such, prompting debates on the legality of Danish parties' utilization of psychographic advertisement on social media. Additionally, the laws governing Party Accounting (Partiregnskabsloven) and Party Support (Partistøtteloven) mandate parties to maintain transparency regarding income and expenditure. However, these laws only necessitate an annual overview of the budget, often resulting in digital advertising being amalgamated within general political posts and campaigns. Consequently, as of 2023, there remains a lack of precise information regarding the exact amount allocated for online political advertising.

The indicator concerning **State Regulation of Resources and Support to the Media Sector** (3%) registers the lowest score among all indicators. In the MPM2023 this indicator obtained a risk score of 17%. The improvement of 14 percentage points is due to a reconsideration on the availability of legal safeguards when it comes to state advertising. The Law on Media Subsidies (Mediestøtte) meticulously outlines the regulations and provisions for financial support to media sectors (Lov nr 1604, 26/12/2013). However, media entities fully or partially owned by the state are not eligible for these subsidies. The allocation of subsidies is

transparent, equitable, and accessible to media organizations of all sizes. In practice, the distribution of support is overseen by the Media Council, whose activities are detailed in annual reports available on their website, along with application guidelines. State advertising in Denmark is relatively limited, primarily utilized for recruitment purposes. Oversight of this domain falls under the purview of the Ombudsman, who, as of 2023, has not issued any decisions regarding state advertising.

**The Independence of Public Service Media (29%)** is assessed as low risk. Procedures for appointing Public Service Media (PSM) members by the Radio and TV Council are transparent and free from political influence, adhering to the Arm's Length Principle, a key regulatory framework in Denmark's media sector. Denmark has implemented the Audiovisual Media Services Directive since July 1st, 2022, aimed at safeguarding consumer rights, ensuring the independence of national media regulators, combating hate speech, and establishing guidelines for audiovisual media and technological advancements. The funding of PSM is governed by the Radio and Television Law and detailed in publicly accessible Public Service Contracts. The allocation of state funding to PSM is subject to public debate and political agreements, with substantial subsidies provided to TV2 and the Danish Broadcasting Corporation (DR), which consequently dominate the media landscape, potentially leading to imbalance. Nonetheless, these Public Service Contracts undergo parliamentary renegotiation every four years, limiting government funds to news organizations not wholly or partially owned by state institutions or publicly financed companies. By requiring renegotiation every four years, the contracts prevent the establishment of long-term dependencies between public service media and specific political entities or parties. This ensures that media outlets do not become beholden to the interests of any particular government or political faction over an extended period. In practice, the editorial stance of Denmark's public service institutions remains independent from government influence or any other form of political pressure. The selection and removal of editors and editors-in-chief adhere strictly to professional and objective criteria, with no instances of direct political interference reported. Changes in government leadership in Denmark have not correlated with alterations in the editorial stance of PSM, affirming their effective editorial autonomy and independence. Nevertheless, there exists a potential risk of unconscious bias favoring particular perspectives. This bias is more likely to stem from unconscious influences rather than deliberate intentions and is closely linked to language use and discourse. Such unconscious biases may manifest in the selection of news frames, where certain concepts, possibly carrying specific ideological connotations, receive greater emphasis than others. While unintentional, this linguistic and conceptual bias could impact the diversity of perspectives presented to the audience, reflecting the prevailing political inclinations within the journalistic community rather than a deliberate attempt to marginalize alternative viewpoints.

## Focus on the digital environment

The area Political Independence scores a medium risk of 58% in the digital environment.

While in Denmark digital native media outlets are generally considered to be free from direct or indirect political control, concerning the indicator Audiovisual media, online platforms, and elections, there is no specific regulation ensuring equal opportunities and transparency in political advertising on online media during electoral campaigns. However, laws such as the Marketing Act (§3) prohibit misleading ads, and contacting individuals without their consent is also forbidden (§6). While political advertising on TV is governed by the Radio and Television Act, social media and other platforms fall under the jurisdiction of the Marketing Act, which prohibits misleading commercials, including those during elections. The use of psycho-geographic targeting, or narrowcasting, is deemed to violate consumer consent requirements under the law.

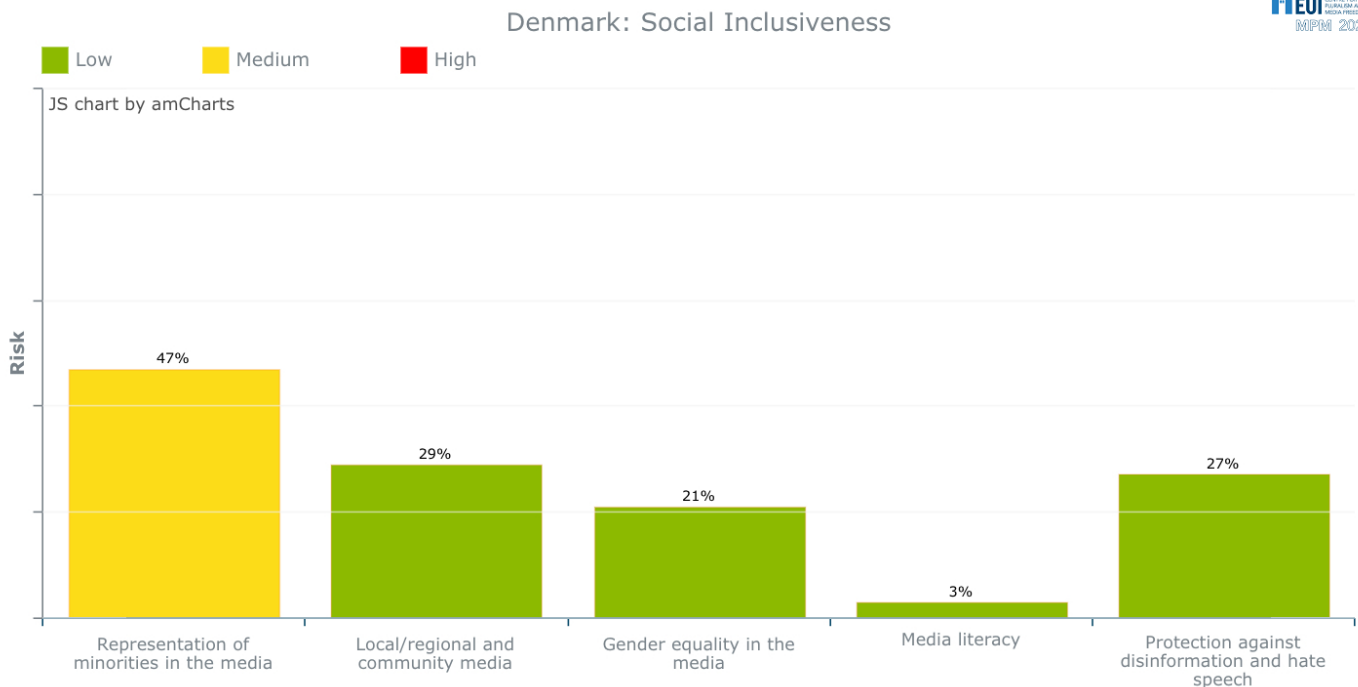
There are no mandated rules for political parties, candidates, or lists participating in elections to disclose campaign spending on online platforms, resulting in a lack of transparency. The only relevant laws governing party finances and expenditure are the Party Accounting Act and the Party Support Act, which outline funding and political contribution requirements. While the Party Support Act does not mandate transparency in expenditures, the Party Accounting Act necessitates an annual overview of expenses, though specifics regarding advertisement spending are typically omitted. Some parties voluntarily disclose advertising transparency, but major parties generally lack transparency in spending and campaign techniques.

To address this lack of transparency, journalists and researchers have utilized Facebook's ad library to assess expenditure. Despite efforts, there is still a deficiency in transparency regarding spending and campaign techniques, as no formal requirement exists, and major parties often do not disclose such details. Mads Fuglsang Hove, a research assistant at the Digital Democracy Center at the University of Southern Denmark, highlights the importance of influencing public debate topics during elections through microtargeting strategies. Microtargeting involves targeting specific voters based on demographic data and interests to maximize impact (SDU, 2022).

Regarding the oversight of personal data use by political parties for electoral campaigning, the Danish Data Protection Agency has shown a serious commitment. Although operating with limited resources, there is no evidence in 2023 of inadequacies in overseeing political parties' use of personal data for campaigning purposes. In 2022, the agency released guidelines for the collection of personal data by political parties, underscoring its dedication to this issue.

### 3.4. Social Inclusiveness (25% - 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.



The score for **Social Inclusiveness** remains associated with a low-risk score (25%) as in the MPM2023. Social Inclusiveness risks primarily revolve around the lack of news in minority languages, and of particular rights for minority groups with regards to broadcast time.

#### Representation of Minorities in the Media (46%).

In Denmark, there appear to be no systemic discrimination against minority groups in the media. It is argued that minorities enjoy equal access to airtime as other segments of Danish society (Interview with expert source Prof. Mehmet Ümit Necef, 2023). There is no legal measures to guarantee the access to broadcast time for minorities. On average, minority groups exhibit lower levels of educational attainment and are less likely to occupy leadership positions in the realms of business and politics. These sociopolitical realities contribute to potential imbalances if any in media representation. Consequently, the underrepresentation of minorities in leading roles may be mirrored in the allocation of airtime, and underscores the interconnected nature of media dynamics with broader social structures. PSM or private audio-visual media, do not offer news in minority languages.

With regards to minority groups with disabilities, Denmark has adopted the UN Convention on the Rights of Persons with Disabilities, with a focus on ensuring accessibility, a fundamental right outlined in the convention. Article 9 specifically emphasizes the right to accessibility, encompassing various aspects. As a result, signatory states are obligated to work towards making society accessible. Furthermore, according to public service laws (nr. 944 article 2), providers falling under § 1, subsection 1, must take proportional measures continuously and gradually to enhance the accessibility of their programs for persons with disabilities. These measures encompass various elements such as sign language interpretation, subtitles



for the deaf and hard of hearing, readable subtitles, visual interpretation, and more. Audio description is incorporated into PSM streaming services, including DRTV and TV2 Play, however, public service contracts usually does not define specific percentages of programs requiring audio description. Yet still, audio description is widely available.

In Denmark, **Local, regional and community media** (25%) enjoy favorable conditions. Notably, Danish legislation does not explicitly recognize community media; instead, the focus is primarily on local and regional media. According to the Radio and Television Act (LBK nr 248, 16/03/2019), non-commercial and regional radio and television station frequencies are allocated to organizations that apply for them, overseen by The Radio and TV Council. Regional stations affiliated with the Public Service Media (PSM) TV2 Denmark benefit from PSM Funds and maintain editorial independence from political influence, akin to national media outlets (Blach-Ørsten et al., 2021). The Danish government provides economic support to local media through financial media support. In the previous media agreement (Ministry of Culture, 2022), for example, the Ministry of Culture has increased economic support for local and regional media, aiming to strengthen local democracies. This involves reallocating funds from national media to local and regional media to address "news deserts" in smaller communities. Despite these efforts, there are signs of decline in local media. For instance, in 2024, Jysk Fynske Medier announced the closure of 11 local newspapers, indicating challenges within the sector (Lange, 2023).

**Gender Equality in the Media** (21%) has obtained a low-risk score, marking an improvement from the MPM23, where this area received a medium-risk score (39%). This improvement primarily stems from a balance in representation on the management boards of Public Service Media (PSM) and private actors in the media sector. Additionally, increased efforts by the public service institutions DR1 and TV2 towards diversity policies, including gender equality, have contributed to this positive shift. For instance, TV2 has begun systematically registering the gender of sources used in interviews to address existing imbalances. Furthermore, both media outlets prioritize gender equality in media representations and hiring policies, which is reported on in their annual reports (see for example TV2, 2022).

**Media Literacy** (3%) is in the low risk category. To properly assess this indicator, the country team has preserved the translation of the concept of Media Literacy into the similar concept Digital Literacy (Digital Dannelselse) that is primarily used in Denmark, which is consistent with the MPM2023 and MPM2022. The concept refers to the competencies of users of digital media, both from a technical and critical perspective, and has become a central focus of education in Denmark (Gran, 2018). It has been operationalized by researchers to discuss issues of digital democracy, cyberbullying, digital pedagogics and citizenship (Mehlsen & Hendricks, 2018; Drotner, 2018; Svendsen & Svendsen, 2021). In the new media agreement, (Ministry of Culture 2023: 14), there is a focus on strengthening media literacy and enhance the digital education and welfare of children and adolescents. E.g. An annual allocation of 3.1 million DKK has been earmarked for the years 2023-2026 to fortify the Media Council for Children and Young People's endeavors in advancing digital education and well-being among children and young individuals. This initiative places particular emphasis on the interplay between well-being and the utilization of behavioral design, retention mechanisms, and artificial intelligence in various online platforms such as games and social media.

**Protection against Disinformation and Hatespeech** (27%). While speech poses a notoriously challenging issue to control, the effectiveness of the fight against hate speech is assessed as relatively good in Denmark. Denmark has concrete legislation against hate speech in its Penal Code (LBK nr 1650, 17/11/2020: paragraph 266-267), commonly referred to as the racism paragraph (racismeparagraffen). This law criminalizes threats, mockery, and degradation targeting groups defined by race, skin color, nationality,

ethnicity, religion, or sexual orientation. Robust public information campaigns, (exemplified by initiatives like [this](#)) consistently address the issue. The use of hate speech in Denmark is met with significant social condemnation. The presence of clear national legislation and its effectiveness further contributes to the overall efficiency in combating hate speech. According to the expert on hatespeech, Lumi Zuleta, who is a consultant at the Institute for Human Rights, a discrepancy exists between documented convictions of hatespeech and self-reported instances of experience. Lumi Zuleta highlights two potential factors underlying the observed discordance. Firstly, a lack of trust in law enforcement and the broader legal framework may hinder individuals from reporting instances of hate speech. This skepticism toward the efficacy of the system to address hate speech effectively serves as a notable barrier to accurate reporting. Secondly, discrepancies may arise due to variations in the interpretation and application of hate speech definitions. Instances perceived as hate speech by individuals may not align with the strict judicial parameters defining the term. Consequently, these experiences may not qualify as legally recognized instances of hate speech, contributing to a lack of underreporting and convictions.

With regards to disinformation, The Intelligence Service (PET) works actively to equip society against influence activities and to uncover and counter the threat from state actors' attempts to influence opinion formation and the political decision-making process in Denmark. Since last year, there have been attempts to influence the public debate in Denmark by spreading disinformation regarding, amongst other topics, the war in Ukraine (DR, 2023). The disinformation have been spread by 152 actors on social media and physically at protests. There is no evidence that Denmark has amped up the fight against disinformation since last year, as it is still a relatively minor issue in Denmark, with this case as the only publicly known one (DR, 2023). In Denmark, there is one major NGO, [TjekDet.dk](#), that is dedicated to fact checking information in the public debate. TjekDet is a part of IFCN. The Danish Broadcasting Corporation, DR, has a department with an associated radio program, Detektor, to fact checking. Only to a minor extent and on a non-systematic basis, other media outlets are doing factchecking. Tjektdet.dk receives funding from the state, it is transparent and adequate and does not influence their political independence.

## Focus on the digital environment

Although Denmark has legislation in its Penal Code aimed at combating hate speech, it does not explicitly address online contexts. Expert on hatespeech, Lumi Zuleta, underscores the importance of enhanced monitoring by social media platforms. Given the substantial prevalence of hate speech in online spaces, proactive measures by these platforms can play a pivotal role in mitigating its proliferation and impact.

In Denmark, while there is no explicit prohibition on disinformation, collaborating with foreign intelligence and powers to manipulate public opinion is prohibited under the Law on Foreign Influence (no. 269 af 26/03/2019). However, this law does not specifically address non-state disinformation. According to the Criminal Law (§ 108), individuals who engage in activities that enable or assist foreign intelligence services to operate within Danish territory, including cooperation to conduct advocacy activities aimed at influencing decision-making or public opinion formation, can face imprisonment for up to 6 years. Additionally, if the intelligence activity pertains to military matters or occurs during wartime or occupation, the penalty may be increased to up to 12 years' imprisonment. The same penalty applies if the influence operation occurs in connection with elections or voting covered by section 116 (Retsinformation, 2019). Several non-governmental initiatives have been established to monitor and research disinformation in Denmark but no new ones in 2023. Notable examples include [Aarhus University](#), the [University of Copenhagen](#), and the [Danish Institute for International Studies](#). These initiatives share some overlap with efforts to enhance Media Literacy and Digital Education, which, among other things, focuses on developing the ability to critically assess information encountered online. This approach is grounded in the method of source criticism (Kilde kritik) derived from historical methodology.

## 4. Conclusions

The conditions in Denmark poses an overall low risk to media pluralism and freedom. The areas **Fundamental Protection** (13%), and **Political Independence** (28%) and **Social Inclusiveness** (25%) are all placed within the low-risk category. **Market Plurality** (61%) is placed within the medium-risk category. The results are relatively stable from the MPM2023 assessment of risk to media pluralism and freedom in Denmark with only between 1-6 percentage points in variation. That is except from **Social Inclusiveness** which have moved from the medium- to the low-risk category. With regards to the online sphere and the digital variables, the areas **Online Fundamental Protection** (13%) and **Online Social Inclusiveness** (15%) fall within the low-risk category. The two remaining areas **Online Market Plurality** (61%) and **Online Political Independence** (58%), are all placed in the medium-risk category. That is similarly in line with the MPM2023.

Due to Denmark's strong tradition of upholding freedom of expression and information, which are enshrined in its constitution, **Fundamental Protection** (13%) falls within the low-risk classification. Journalists typically operate without political intervention and experience a high degree of personal security, though occasional covert threats from fringe groups of religious extremists may pose challenges. In 2023, legislation imposing limitations on the civil right to blasphemy was introduced, raising concerns regarding freedom of expression rights. Online **Fundamental Protection** (13%) aligns with the overall findings in this domain.

### *Recommendations*

- NGO's and think tanks are encouraged to evaluate the consequences of the new legislation that limits the civil right to satire and critique of religion.

**Market Plurality** garnered a risk score of 61%, categorizing it as a medium-risk area. This assessment is primarily attributed to the absence of media-specific regulations addressing owner concentration and ensuring editorial independence from market influences. Although Denmark has general laws preventing market monopolies, the influence of informal cultural norms has not been factored into this evaluation. Similarly, **Online Market Plurality** also received a medium-risk score of 61%. This can be partially attributed to the lack of up-to-date and specific judicial regulations tailored to preventing monopolization in the online sphere.

### *Recommendations*

- Policymakers are encouraged to explore and evaluate the potential of media-specific regulations to curb potential future monopolistic practices stemming from ownership concentration.
- Policy makers are encouraged to consider whether regulatory measures specifically aimed at preventing high degrees of concentration in the online media sector, could have utility in Denmark
- The Ministry of Culture and non-governmental organizations are encouraged to allocate resources towards further research on market competition and concentration.

**Political Independence** has achieved a low-risk assessment of 28%. As noted earlier, robust democratic values and implicit social norms, such as the principle of arms-length common in Scandinavian countries, significantly influence this outcome. Simultaneously, the absence of explicit laws regarding media's political independence may account for why the score isn't lower. The medium-level risk score for **Online Political Independence** (58%) is primarily attributed to the absence of clear regulations concerning political advertising online, an area that is otherwise effectively regulated offline. Similar to offline Political Independence, informal democratic norms appear to suffice, explaining the lack of formal legislation.

### *Recommendations*

- Policymakers are encouraged to consider implementing regulation regarding transparency and expenditure on political advertisement in particular online and during elections.
- State and civil society actors are encouraged to allocate resources towards further research with regards to the political independence of specific media institutions as many rely directly or indirectly on state subsidies.

The area of **Social Inclusiveness** achieved a low-risk rating of 25%. While Public Service Media (PSM) have clear guidelines addressing individuals with hearing or visual impairments, the same cannot be said for privately owned media entities, leading to differences in the quantity and type of audio-visual content they offer to the public. **Online Social Inclusiveness** received a low-risk score of 15%. Denmark lacks online-specific regulations targeting hate speech, but expressions of racism, both online and offline, are legally punishable.

### *Recommendations*

- The Danish Ministry of Culture is encouraged to contemplate the adoption of standardized criteria within Public Service Media (PSM) agreements, specifying the quantity of programs accessible to individuals with visual and hearing impairments.
- Private television stations are encouraged to offer content accessible to individuals with visual and hearing impairments.
- Encouragement is extended to political figures, public intellectuals, and NGOs to take a more proactive role in publicly condemning instances of hate speech

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## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Sandra</i>	<i>Simonsen</i>		<i>Aarhus University - Department of Media and Journalism Studies</i>	X

## 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>Thomas</i>	<i>Pallesen</i>	<i>Associate Professor</i>	<i>Danish School of Media and Journalism</i>
<i>Mette</i>	<i>Lundberg</i>	<i>Boardmember</i>	<i>Danish Internet Forum</i>
<i>Martin</i>	<i>Lavesen</i>	<i>Press Council Chair</i>	<i>Press Council</i>
<i>Merethe</i>	<i>Eckhardt</i>	<i>Member</i>	<i>Tv- and Radio Council</i>

**Research Project Report**

Issue -

June 2024

doi:10.2870/476567

ISBN:978-92-9466-562-1

QM-09-24-467-EN-N



Publications Office  
of the European Union

