



Feedback regarding The EU Commission's proposal for a European legal act on media freedom etc.

The Danish Union of Journalists hereby submits its feedback on the proposal for a Regulation of the European Parliament and the Council establishing a common framework for media (European Media Freedom Act) and amending Directive 2010/13 EU (the Audiovisual Media Service Directive)

On behalf of the Danish Union of Journalists, we very much welcome the proposal for the legal act on media freedom.

It is very worrying that there are EU member states that are increasingly violating the independence of the media and the working conditions of journalists.

The proposals and initiatives highlight most of the relevant challenges for media and journalists in Europe. This applies not least to the challenges of ensuring the media's editorial independence, ensuring a solid and pluralistic media supply, and to protect journalists' safety, freedom of expression and working conditions.

For the Danish Union of Journalists, it is crucial that the initiatives to ensure media freedom, on the one hand, must be sufficiently strong and binding, but that, on the other hand, they must not in themselves mean a restriction of the independence of the media and journalists.

On many points, the Danish Union of Journalists is satisfied with the strength of the proposed initiatives. On other points, we have some suggestions for necessary improvements to the texts of the proposal.

We agree with the consultation response that our colleagues in the European Federation of Journalists, EFJ have drawn up, and which we are attaching.

The most important points are:

- The need to adopt a forward-looking inclusive definition of media and media service providers in line with international standards.
- The improvement regarding **protection of sources** of journalists and deployment of any spyware to be in line with international standards.
- The need for binding, common and clear rules on **transparency of media ownership** to ensure meaningful transparency is necessary for trust in journalism.
- The strengthening of safeguards on **independence** of National Regulatory Authorities.
- The need to guarantee of full independence of the **European Board for Media Service** from the European Commission.
- The assessment of **public interest tests of media mergers** as a minimum action by the board and with civil society and journalists' organizations involvement. This is pivotal to fight media capture by media moguls and oligarchs who follow their own agenda but not the public interest journalism.
- The need for a better **enforcement** of existing and newly established media rules.

Only a revised text considering these points can efficiently contribute to the defense of journalism.