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Problem Definitions in European Policy Debates on Media Pluralism and Online Platforms

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Introduction

Policymakers and experts around the world are currently debating regulatory solutions to the challenges of digital platforms and their implications for media policy goals, such as freedom of expression and media pluralism. But what are the actual problems that these proposals seek to solve, and what can different ways of framing the policy problems tell us about the underlying assumptions and political rationalities related to media pluralism as a policy goal?

This chapter analyzes these problem definitions with a focus on recent European media policy, where the notion of media pluralism has long been considered a fundamental yet contested policy aim. In the past decades, media pluralism has usually been invoked in European policy debates around the issues of media ownership concentration, the role of public service media, and media subsidies. Often these debates have been marked by conflicts between market-oriented and cultural or democratic political rationalities and their conflicting conceptions of media pluralism (Karppinen 2013).

In recent years, debates on media pluralism have shifted to involve questions around the power of digital platforms, algorithms, filter bubbles, disinformation and related risks and problems. These debates now add a new layer of ambiguity to the debates on media pluralism, including new problem definitions, stakeholders, policy interests, potential solutions, and potentially new political rationalities for defining media pluralism as a policy aim.

The chapter reviews recent European media policy debates, including academic commentary, policy documents produced by the Council of Europe and the European Union, and monitoring reports, such as the Media Pluralism Monitor (MPM), which has recently been redesigned to account for the impact of digital developments. Based on these, the chapter identifies four prominent problem definitions related to: the crisis of legacy media, algorithmic manipulation, lack of transparency and the concentration power. I will then critically assess each of these problem definitions and their limitations from the perspective of media pluralism.

The role of problem definitions in platform politics

Instead of offering a detailed policy analysis of regulatory responses to the problems of platforms, the aim of this chapter is to examine the political rationalities and problem definitions that underlie current expert and policy debates on digital platforms and their impact on media pluralism. The premise of the approach is that emerging policy problems, such as those raised by digital platforms, are not merely a reflection of objective realities that exist independently of politics.

Drawing on post-positivist or discursive approaches to policy studies, it can be argued that public and policy debates and other governmental practices also produce and construct the problems that require political attention (e.g. Fischer 2003: 4–5; Bacchi 2009, Bacchi and Goodwin 2016). Others

strands of public policy studies have also emphasized that policymaking is not a linear process of rational problem solving. Policy action requires that social issues are first conceptualized as policy problems, to which political initiatives and available solutions can be presented as answers (e.g. Kingdon 2003). Therefore, the framing of issues as problems that require political attention is part of politics as much as the debate over alternative solutions. This makes the definition of policy problems a site of definitional struggle and political contestation, with different stakeholders having an interest in framing the problems in particular ways. Problem definitions and framings also have political consequences in shaping the terms of debate, the choice of policy arenas and the range of alternative options available to policymakers. For example, if problems associated with platforms are framed as a competition policy issue, they will be assigned to different domains of policymaking, with their own competences, criteria and tools, than if they are framed as media or cultural policy problems.

This raises a need to critically examine the problem representations related to platforms in public, policy and expert debates. The focus on problem definitions and the construction of the policy agenda can be regarded as particularly important in the context of policy change and emerging policy areas. Several scholars have noted that recent political concerns over platforms are often driven by 'public shocks', or scandals related to issues, such as election manipulation, disinformation or privacy and data breaches (Ananny and Gillespie 2017). However, not all scandals lead to policy action. Instead, the success of some problem representations over others also depends on their ability to become institutionalized and normalized in the routines of policymaking (Hay 2004). Subsequent questions then arise on what considerations are missing from the policy agenda, and what kinds of 'policy silences' they produce (Freedman 2010).

In this chapter, I assume that there are a range of factors that influence the problem definitions and the agenda of digital platform politics. These involve media and public debates, stakeholder interests and lobbying, institutional and governmental logics, and expert discourses.

Problem representations can also be linked to broader 'political rationalities' that underlie policy discourses (Bacchi and Goodwin 2016: 43). Political rationalities involve different conceptual logics, justifications for regulatory intervention, conceptions of appropriate forms of intervention and notions of who is responsible for addressing policy problems. In media policy debates, for example, a neoliberal political rationality can be associated with problematizations where media is conceptualized purely in economic or market terms, whereas political rationalities of welfare, citizenship and democracy often underlie more interventionist policy discourses. While current digital policy debates can at least partly build on the rationalities and problem definitions of established media policy debates, the digital platforms also create new problems, mobilize new stakeholders with vested interests and raise new public interest concerns. Potentially these amount to new political rationalities for conceptualizing media pluralism as a policy issue.

The chapter focuses empirically on policy discourses within the European Union (EU) and the Council of Europe, both of which have recently issued several initiatives related to digital platforms and their impact on media freedom and pluralism. The EU initiatives, such as the new Digital Services Act package, Media and Audiovisual Action Plan, and the European Democracy Action Plan, include proposals for binding regulations as well as recommendations and discussion papers. The Council of Europe recommendations, on the other hand, are non-binding but still influential as a reflection of policy argumentation, discourses and values beyond the EU. The expert committees of the Council of Europe also have a long history of keeping the issues of media pluralism and concentration on the policy agenda in Europe. Finally, I will also refer to the academic reports such as the MPM, which aims to identify risks to media pluralism in EU member states, also including risks related particularly

to online platforms. These documents also communicate with broader academic commentary, which arguably also shapes the problem definitions adopted in policy discourse.

I will draw on examples from these different policy contexts to illustrate different problem definitions, their limitations and underlying assumptions. However, the analysis does not constitute a comprehensive review of policy debates at the European level to cover differences between institutions or changes over time. Instead, the four sets of problem definitions that I have identified function more as examples of how different ways of problematizing the role of platforms produces different political rationalities for promoting media pluralism. Before discussing the problem definitions, I first briefly review the background of media pluralism as a policy aim in European media policy debates and discuss how digital platforms have challenged existing policy paradigms.

Media pluralism as an aim in European policy debates

The notion of media pluralism has received significant attention in European media policy debates for several decades. Media pluralism is also enshrined in Article 11 of the Charter of Fundamental Rights of the European Union as a fundamental principle alongside freedom of expression and media freedom. Similarly, the Council of Europe and the European Court of Human Rights have long emphasized the link between media pluralism and the freedom of expression.

As an abstract principle, the notion of media pluralism has been subject to multiple definitions and aspects. At a general level, however, the debate often converges around the core aims of promoting citizens' access to a wide range of viewpoints and preventing undue concentration of media power in the hands of few dominant actors (e.g. Council of Europe 2018a). The overriding logic here links media pluralism with freedom of expression and the aim of creating a favourable environment for participation in public debate by all people (e.g. Nenadic and Milosavlevic 2021: 92). In these debates, media pluralism has been viewed not only as a consequence of free expression but also its precondition, which creates obligations for media policy to take positive measures to safeguard and promote media pluralism (see Kenyon 2021).

The fact that media pluralism has emerged as a common aim, shared by almost all sides in media policy debates, however, does not mean that there are no conflicting values and interests. As Robert Picard (2017: 256) puts it, agreeing on common European policy and finding evidence to support it has been 'a Sisyphean task with numerous starts, stops, retreats and restarts'. Understood to include both national and European-level initiatives, Picard argues that European media pluralism policies 'have not yet produced any clear objectives or policy agreement about how to pursue media pluralism despite far greater policy attention to the issue than in other parts of the world' (Picard 2017: 256).

There are differing opinions on the meaning and nature of media pluralism as a theoretical, political or empirical concept, and the concept can easily be adjusted to different political purposes (see Karppinen 2013). The aim of promoting media pluralism can be seen as a meeting point for different demands rooted in different social values, interests and normative conceptions of the role of media in society. Roughly speaking, there have been two competing paradigms, or political rationalities of media pluralism competing for a hegemonic position in European media policy, which also reflect wider controversies in European media policy.

First, much of the policy debates on media pluralism have focused primarily on economic concerns related to competition, free markets and consumer choice. This focus in partly explained by the founding rationale of the EU to promote internal European markets. The market-driven discourse often approaches media pluralism quantitatively in terms of consumer choice, available outlets or

content options. Although most would acknowledge that media pluralism also relates to cultural and political concerns, these are often either marginalized or elided with the quantitative and consumer-led conception of pluralism as consumer choice in this discourse.

On the other hand, there is a democracy-driven discourse, which has challenged the market-driven conceptions of pluralism and diversity. Its proponents have tried to link pluralism with broader public interest values, and more multifaceted ideals of democracy, the public sphere and culture. These ideals are often used to justify, for example, the role of public service media, community media and minority media. If the former rationality has been dominant within the European Commission, the latter has received more attention within the European Parliament, the Council of Europe and some member states (Karppinen 2013).

These two logics can be paralleled with Edwin Baker's distinction between commodified and non-commodified logics in American debates on media concentration and pluralism. The commodified logic's ultimate concern is with fair competition and the provision of commodities to consumers, whereas non-commodified rationale derives essentially from democratic theory and the egalitarian commitment to the democratic distribution of communicative power in the public sphere and 'wide and fair dispersal of power and ubiquitous opportunities to present preferences, views, visions' (Baker 2007: 7).

These competing rationalities have involved different understandings of media pluralism, its measurement, the appropriate means to promote it and the policy issues it covers. In terms of concrete policy issues, media pluralism has historically been associated above all with the problem of media ownership concentration and its implications for political pluralism. In the last couple of decades, however, the definitions of media pluralism as a policy issue have constantly expanded beyond media ownership to also include issues related to cultural, geographic and minority issues. Other prominent issues raised in European debates on pluralism include the role of public service media, risks of political interference or abuse of power by media owners, lack of transparency in media ownership, shortcomings in inclusiveness and gender balance, and deficiencies in ensuring safety of journalists (e.g. CMPF 2021; Nenadic 2019).

Most of these concerns belong to the competence of EU member states, as the EU itself has little direct competence in the fields of media or cultural policy, apart from general competition policy. Within the EU, one response to this has been to focus on the ostensibly uncontroversial aim of developing better tools for monitoring and measuring media pluralism, instead of harmonizing regulation. The tool developed within the EU for this purpose, the MPM, has stated an aim to bring 'a stronger evidentiary basis to define priorities and actions for improving media pluralism' and to 'ensure a uniform basis for dealing with pluralism issues and provide a more objective basis for the often heated political and economic arguments' (KU Leuven–ICRI 2009, 3).

The MPM, implemented by the Centre for Media Pluralism and Media Freedom at the European University Institute, does not aim to directly measure the state of media pluralism but instead seeks to identify risks related to various aspects of media pluralism to bring those questions to the policy agenda. This makes it a particularly interesting tool from the perspective of constructing policy problems.

The approach of the MPM thus recognizes the multi-faceted and normative character of media pluralism as a policy objective as well as the political sensitivities surrounding its regulation. With reference to the reports and resolutions of the Council of Europe and the European Parliament and incorporating dimensions of media pluralism defined in academic and policy debates, the MPM

defines media pluralism broadly. This involves 'all measures that ensure citizens' access to a variety of information sources and voices, allowing them to form opinions without the undue influence of one dominant opinion forming power' (KU Leuven–ICRI 2009: 2) and 'the scope for a wide range of social, political and cultural values, opinions, information and interests to find expression through the media' (KU Leuven–ICRI 2009: 5).

Both the Council of Europe and the current EU approaches have thus explicitly defined media pluralism as an issue that goes beyond media ownership. The MPM, for example, encompasses four major areas (basic protection, market plurality, political independence and social inclusiveness), with each broken down into several subareas and indicators (KU Leuven–ICRI 2009). From the beginning, the European Commission also instructed that the monitoring should take into account the implications of recent technological changes for the pluralism and diversity debate, noting that 'concern expressed regarding media pluralism and diversity may inter alia also be concern regarding structural changes that are taking place as a result of new technology, and the impact these may be having on media output' (European Commission 2007: 2).

From media to information pluralism

The original idea of the MPM was to consider not only media supply but also distribution mechanisms and potential access to media as relevant aspects (KU Leuven–ICRI 2009: 73). However, it was only in the last decade that debates on media pluralism have in earnest shifted to account for the structural power of digital platforms in shaping the information environment. These changes have gradually also become more prominent in the European media policy and in the subsequent revisions of the MPM methodology (see, e.g. Council of Europe 2018b; CMPF 2021).

In contrast to earlier debates on cultural and media policy, these new issues also involve a significant shift in the role of the European and national policymaking. Media and cultural policies have traditionally belonged to the competence of individual member states but the regulation of global digital platforms is an issue where especially the smaller member states have little leverage compared to the EU. Consequently, the European Union and larger member states like Germany and France have adopted an increasingly interventionist stance towards the digital platform companies, trying to position themselves as global forerunners in the effort to regulate digital platforms (e.g. Helberger 2020; van Dijk 2021). Many of the recent initiatives of the EU are not only recommendations but also binding regulation, which shapes the policies of member states, and in some cases, policy trajectories in the rest of the world. Consequently, it is relevant also from the broader global perspective of media pluralism to examine the underlying political rationalities of these debates.

The recent EU initiatives that address the power of social media platforms and media pluralism include recommendations and codes of conduct, such as the Action Plan Against Disinformation, binding regulation, including the proposed Digital Services Act package, and support and innovation schemes, such as the EU Media and Audiovisual Action Plan. Furthermore, the role of digital media is also central in more general strategy documents, such as the European Democracy Action Plan and the European Digital Strategy.

While the notion of media pluralism itself has not necessarily been at the core of the debate on digital platforms, it is becoming evident that the problems and solutions offered in these initiatives are also shaping the debates on media pluralism. As Nenadic (2019: 131) argues, when social media platforms have challenged the position of media organizations as privileged information gatekeepers, the established approaches and concepts have proven inadequate for evaluating media

pluralism and the different entities that compete in media markets. New approaches to media pluralism require a more nuanced consideration of actors and the production of 'news' and information. Consequently, Milosavjevic and Nenadic (2021) argue that there is a shift from media to 'information pluralism'. Instead of focusing only on particular actors defined as media companies, pluralism policies should be 'media and platform agnostic' and focus on the outcome that needs protection.

Similarly, the Council of Europe (2018b: 2) highlights the role of intermediaries as a range of actors who perform curatorial and editorial roles through moderation and ranking of content, and 'exert forms of control which influence users' access to information online in ways comparable to media, or they may perform other functions that resemble those of publishers'.

Reflecting these changes, the EU MPM has also been revised to include issues and potential risks to pluralism with regard to online platforms in particular (Brogi 2020). New indicators cover, for example, issues related to the net neutrality rules, protections against hate speech, online platforms concentration and competition, sustainability and viability of legacy media, and other measures taken by member states, such as 'digital service tax' to help pluralism or other measures to support alternative media business models.

The range of initiatives that deal with digital platforms and media hardly constitute a coherent new framework or paradigm of thinking about media pluralism. Instead, they are marked by conflicting political rationalities and interests. Much like previous media policies, the approaches to digital platforms combine the rationalities of promoting European markets and competitiveness with ideas of fundamental rights and democracy.

Like previous debates on media pluralism, policy initiatives indicate different understandings of what pluralism is and what role can regulation and media policy play in promoting it. There is an emerging consensus that digital platforms increasingly influence media pluralism and perhaps even that new regulation and oversight is necessary. However, it is often unclear what precisely are the problems that regulation should address and with what objectives. As Nenadic (2019: 137) notes, there seems to be a lack of benchmarks against which to evaluate the impact of the activities of intermediaries on media pluralism.

If the traditional debates were marked by a conflict between the rationalities of market-driven and democracy-driven conceptions of media pluralism, the emerging discussions on platforms seem to retain these tensions, while adding a new layer of contestation involving new stakeholders, different understandings of pluralism as a policy aim, diverging conceptions of the nature of platforms as media actors.

Problem definitions and conceptions of pluralism in recent platform policies

In the following, I will turn to analyze some of the prominent problem definitions in recent European platform and media policy debates and discuss their implications for media pluralism. I outline four prominent problematizations that recur in European policy debates on digital platforms, with examples from policy documents. I have focused on problem definitions that reflect concerns for media pluralism, democracy and the public sphere – although they are not always discussed under the label of media pluralism – and have not included problem definitions that focus on other harms associated with platforms, such as national security risks, privacy or public health.

The following four categories of problem definitions are a reconstruction of themes found across policy documents and academic debate. They do not mirror the positions of specific stakeholders or

institutions, although I do also discuss the possible origins and interests behind the problem definitions. The problem definitions are not comprehensive of all policy debates and the categorization is naturally open to both conceptual and empirical challenge and questioning. Instead of systematically mapping of all policy discourses, the aim here is to illustrate the role of problem definitions by critically examining how some prominent problem definitions shape policy debates.

Platforms as a threat to legacy media and 'responsible journalism'

One prominent problem definition in European policy debates centres around concerns for the sustainability of domestic media industries and 'quality journalism' in competition with mostly US-based digital platforms and new patterns of media use. In these discussions, media pluralism is typically understood in terms of availability of different journalistic outlets and content options. This is perceived to be under threat when traditional media, as largest investors in news content, face declining resources and fewer journalists to produce news and other public interest content.

As an example of this problem definition, the European Commission has recently launched a 'Media and Audiovisual Action Plan' (2020a), with aims to 'boost European media and help maintain European cultural and technological autonomy in the Digital Decade' and help Europe's media 'not only to be resilient but also to remain competitive at European and global levels'. Similar concerns over the production of reliable media content can also be found in other Commission initiatives, such as the EU's Digital Strategy and the European Democracy Action Plan (European Commission 2020b).

The crisis of journalism narrative, which has become familiar in both academic and policy debates on journalism, is also present in the Council of Europe documents. The 'declaration on the financial sustainability of quality journalism in the digital age', for example, underlines the importance of pluralistic media and quality journalism for democracy, and how digital transformation has compromised the 'traditional business models' that have supported this role (Council of Europe 2019).

It is widely accepted that platforms have impacted the business of traditional media and journalism, so the concern is not surprising. The terminology and framing of the problem, however, are interesting. The notion of quality journalism is here strongly associated with traditional media, which is described as offering 'diverse, credible, interesting and timely information available to the public' and juxtaposed with 'propaganda, misinformation and disinformation proliferating on social media' (Council of Europe 2019).

The concerns for democracy and media pluralism are here almost elided with the competitiveness of the legacy media industry. Besides the language of democracy and the societal role of quality journalism, the same concerns are often framed in terms of fair competition or 'a level playing field'. Embedded in the discourse is the idea that European domestic media face unfair competition or asymmetrical relationship from the dominant digital platforms, which distorts 'normal' media market competition. In line with the policy debates, the revised MPM framework now also includes indicators for 'media viability' and the sustainability of quality journalism as potential risks to media pluralism. As Brogi (2020) notes, the assumption here is that 'the journalistic profession is facing a deep crisis' – mainly because of online platforms disrupting the traditional business models of news media.

The logic of problematization that places existing, national media institutions against dominant digital platforms is, of course, not unique to European debates. In analyzing Australia's digital platforms inquiry, Flew and Wilding (2021: 54), for example, identify 'a newfound, or perhaps

rediscovered, recognition of the 'public good' status of news and journalism' among policymakers. This problem definition has gained even more prominence around the world after the coronavirus pandemic, which has accelerated the economic crisis of journalism and generated new calls for public support to media organizations (CMFP 2021b).

The notion of 'crisis' is not anything new in academic and policy debates on journalism and several scholars have critically examined the uses of crisis narrative in these debates (e.g. Brüggeman et al. 2016; Zelizer 2015). From the perspective of media pluralism, the assumptions of the crisis narrative can also be critically questioned. On the one hand, it is obvious that the digital transformation and the decline in the number of professional journalists and news outlets have implications for media pluralism, in the form of both structural diversity of news sources as well as the production of journalistic content. On the other hand, as Brüggeman et al. (2016) argue, the crisis framing is not simply a neutral description of the situation but often also a means by which strategic actors frame the situation and try to influence media policy making to align with their motives. The crisis of journalism discourse is thus an example of a problem definition that is driven by stakeholder interests and lobbying.

In media policy debates, abstract principles such as media pluralism often function as much as rhetorical devices used by self-interested agents than as analytical tools for policymakers (e.g. Karppinen 2013). For example, notions of pluralism and diversity have long served as convenient keywords for justifying measures to support domestic media and cultural production, even when the measures are originally driven more by the interests of the industry than social, cultural or democratic policy rationales.

In this sense, the association of media pluralism with the protection of domestic or European media industry is not anything new as it resembles the problematization of 'Americanization' that was prominent in European media policy in the past decades. Regarding discourses on digital technology, however, the emphasis on terms like quality journalism and responsible media represents a notable discursive shift from debates of only a decade ago, when it was commonplace in both academic and policy discourse to view new digital media technologies as tools that will lead towards pluralization of the public sphere, precisely because of their ability to challenge the concentrated power of traditional or mainstream media (e.g. Castells 2007). For many, the disruption of legacy media was then above all a positive development that would widen the spectrum of voices that have access to the public sphere.

In contrast, the new digital media are now increasingly seen as threatening media pluralism by compromising the sustainability of the previously maligned traditional media. From the perspective of media pluralism, the discursive shift also raises uncomfortable questions of whether the emergence of new dominant platforms has been different from anticipated, providing too much or wrong kinds of pluralism, or if these discourses employed different conceptions of media pluralism as a media policy aim to begin with.

Algorithmic manipulation as a threat to democracy

Another problem representation that is prominent in current European policy debates relates even more directly to digital technology itself as a threat to media pluralism and the proper functioning of democracy more broadly.

As Barrett et al. (2021) put it, the relations between digital technologies and democracy in public policy discourses are often capricious. In line with academic debates, where debates on digital technology have shifted emphasis from empowerment to threats to democracy, public and policy

discourses now increasingly focus on malicious uses of technology, including mis- and disinformation, polarization, media manipulation and propaganda – a constellation of issues that Freelon and Wells (2020: 145) call 'the defining political communication topic of our time'.

Problem definitions around this constellation of issues are certainly not difficult to find in recent European policy debates on media pluralism. The High Level Group on Media Freedom and Pluralism nominated by the European Commission articulated already in 2013 many of the current concerns related to filter bubbles, recommendation systems and the personalization of news and the negative impact on media pluralism, and ultimately on democracy, if 'citizens only get news on subjects they are interested in, and with the perspective they identify with' (Vīķe-Freiberga et al. 2013: 27).

Since then, the European Commission has made issues of algorithmic online manipulation a focus point of several initiatives and expert reports. The reasons and objectives of the new EU Digital Services Act, for instance, discusses 'manipulative techniques' and 'systemic risks' associated with digital services, seen as a 'source of new risks and challenges, both for society as a whole and individuals using such services', including citizens' 'limitations to express themselves and other societal harms' (European Commission 2020c. n.pag.).

Similarly, Council of Europe (2018c) report on the human rights implications of automated data processing and algorithms identifies a number of human rights concerns triggered by the increasing role of algorithms in decision-making, including 'their potential for harming the freedom of information and freedom of expression of individuals, groups and whole segments of societies' through the 'fragmentation of the public sphere and to the creation of "echo chambers" that favour only certain types of news outlets, thereby enhancing levels of polarisation in society […]' (17). Another Council of Europe (2018b) recommendation on the roles and responsibilities of internet intermediaries explicitly frames algorithms as a media pluralism problem, arguing that states should develop 'co-regulatory policies addressing the algorithmic systems that govern the distribution of online content and specifically political advertising and political communication, with the aim of enhancing exposure diversity'.

From the perspective of media pluralism, these concerns differ from the focus on European media discussed above. Whereas the concerns over media industries and journalistic production clearly focus on the traditional aspects of content and source diversity, the problematization of algorithmic manipulation explicitly focus on media use and exposure diversity, understood as the range of viewpoints individuals consume, as opposed to the range of content available across the media system in principle (see, e.g., Helberger 2018; Napoli 2011).

In contrast to concerns for traditional media, this problem definition is not as easily identified with any specific stakeholders or interest groups. Instead, policy discourses and problem definitions around algorithmic manipulation seem to be influenced by popularized terms, such as disinformation, echo chambers and filter bubbles, which either implicitly or explicitly appear in most of the policy and expert papers on media pluralism.

Despite routine references to these terms in policy debates, many scholars have noted that there is a gap between policy uses of these terms and the actual research on the mechanisms and prevalence of filter bubbles, echo chambers and polarization (e.g., Bruns 2021; Zuiderveen Borgesius et al. 2016). Consequently, these terms are often poorly defined and used loosely as a general justification for policy attention, rather than explaining how these problems, or measures to address them, would specifically impact media pluralism. Conceptualization of media pluralism, beyond the

assumption of narrowing exposure caused by social media, is thus often lacking in the discourses that problematize the new algorithmic affordances and their impact on democracy.

This vagueness has led many scholars to criticize these popularized notions and lament that the focus on technology itself may even direct attention away from more pressing problems that require political attention. As Bruns (2021: 33–34) puts it, as 'highly evocative but ill-defined metaphors', filter bubbles and echo chambers 'constitute an unfounded moral panic that presents a convenient technological scapegoat (search and social platforms and their affordances and algorithms)'.

Similarly, Barrett et al. (2021) argue that policy debates are often overly focused on technology's effects on democracy, and although policymakers often refer to their desire to strengthen democracy and mitigate technological threats, the ideas of 'proper' or 'healthy' functioning of democracy in these debates are often poorly defined.

Again, this is not to say that algorithmic manipulation or technological affordances are not worth problematizing from the perspective of media pluralism. However, it is worth noting that problem definitions that emphasize the agency of technology or algorithms have implications for the policy debate. The focus on technology may, for example, invite 'technological solutionism' that aims to solve problems by tweaking the algorithms, instead of addressing broader problems related to the media infrastructure, economic incentives, and the distribution of communicative power (see Morozov 2013).

Lack of transparency and accountability as a policy problem

A third common theme in problematizations of digital platforms' role in society, and their impact on media pluralism, is transparency and lack of accountability. This is a problem definition also driven by academic researchers who often rely on data provided by platforms to study their impact on society.

The idea of transparency has long been central in European debates on media pluralism. Measures and monitoring to promote transparency of media ownership and control have been seen as important both as a basis for regulation but also in itself. Transparency and monitoring measures have been the focus of the EU approach to media pluralism since the launch of the MPM, which itself is an attempt to enhance the 'auditability' of media pluralism and create publicly available information about risks to pluralism.

The Council of Europe has also underlined in numerous instances underlined the importance of media ownership transparency for safeguarding public debate in democratic societies, arguing that transparency of media ownership makes 'media pluralism effective by bringing ownership structures behind the media – which can influence editorial policies – to the awareness of the public and regulatory authorities' (Council of Europe 2018a, n.pag.).

This logic of emphasizing transparency is also extended to questions beyond media ownership, including other control arrangements, journalistic practices and especially in the context of digital intermediaries, information on how media content is algorithmically managed, edited, curated and created (Council of Europe 2018a).

There is a widespread perception in public, policy and academic discourses that digital platforms present a particular problem from the perspective of transparency, as citizens have limited access to the techniques and processes that determine what they see online (Barrett 2021: 9). This is reflected, for example, in the metaphor of the 'black box' and the emergence of a whole field of studies on algorithmic accountability and transparency (e.g., Diakopoulos 2016; Pasquale 2016).

The lack of transparency is a central focus of the EU's Digital Services Act package and its justifications, which refer to the idea that platforms increasingly deploy recommendation systems that shape our information environment without necessary transparency obligations about these systems. The measures proposed to address this problem include, for example, new reporting obligations for platforms, requirements regarding transparency of moderation and recommendation systems, and special access for vetted researchers to the data necessary to understand the systemic risks that very large online platforms pose to media freedom (European Commission 2020c).

What makes transparency interesting as a problem definition is that it is a notion that almost anyone can embrace, perhaps apart from those with proprietary interests related to algorithms. Yet the emphasis on transparency can also have contradictory and unintended implications for the shaping of public and policy debates. Critics have noted that policymakers tend to offer transparency as a universal solution to a variety of problems, particularly in contexts characterized by a high degree of uncertainty (August and Osrecki 2019). As such, it can also function as a substitute for more concrete and meaningful measures to regulate the platforms or promote pluralism.

Transparency can refer to information available both 'downwards' to the public and 'upwards' to the regulators or other monitoring bodies, each with their own rationales (Craufurd Smith et al. 2021). Downwards transparency links with the ideas of media literacy and the assumption that more information will lead to more competent media use. Upwards transparency, on the other hand, presumes that platforms will act more responsibly when monitored. However, both assumptions can be questioned. Transparency alone does not necessarily lead to more informed users or more institutional accountability, and in some cases demands for more information and visibility may even have paradoxical consequences of producing more opacity or only an illusion of accountability (e.g., Ananny and Crawford 2018; August and Osrecki 2019; Stohl et al. 2016). This can make the focus on transparency somewhat evasive: assessing the impact of digital platforms obviously requires transparency but information alone will not solve the problems associated with concentrated media structures and lack of media pluralism.

Concentration of power as a problem in itself

Finally, I discuss a problem definition that relates to all of the themes discussed above but points to a more general, systemic style of problematization. A common theme here is to emphasize the mere size of the platforms, the unprecedented scale of power concentration and the problems this creates for regulation. As Brogi (2020: 6) argues,

> while in the traditional media landscape risks stemmed mainly from the dominance of media outlets at national level, which was easier to regulate (e.g., by media ownership limitations), in today's digital world such dominance by global platforms is much more challenging and difficult to deal with, not only in terms of market dominance.

Similarly, the Council of Europe (2018b) notes how the concentration of power and network effects have led to the existence of dominant entities that are 'in positions of influence or even control of principal modes of public communication'. This power can also be conceptualized in market terms, as in the EU Digital Services Act package that aims to address the 'systemic risks' arising from the role of digital platforms as gatekeepers with 'the power to act as private rule-makers' that control important ecosystems in the digital economy (European Commission 2020c). These initiatives thus recognize that platforms have 'structural power' to shape and determine the structures within which other actors in society must operate (Horten 2016: 5).

Although the Digital Services Act does not further discuss media pluralism as a distinct risk, it clearly assumes that there is a relationship between the size of a service and the potential for harm (Broughton Micova 2021). The nature of the harms associated with size can be conceptualized in different ways. However, the concentration of power can also be viewed as problematic in itself beyond the identification of specific harms. In fact, there is also a potential tension between current initiatives that seek to address specific concerns arising from the role of platforms as facilitators of speech and the problematization of concentration of power itself. As Helberger (2020: 848) argues, 'by formalizing and reinforcing the role of platforms as governors of online speech, […] the current initiatives also further reinforce the opinion power of these platforms and thereby their political power'.

From the perspective of media policy, this discourse relates to some of the basic controversies in policy debates on media pluralism, and the question of whether concentration of power is a problem itself or only when concrete abuses or negative consequences of that power, such as risks to the diversity of views, can be demonstrated. It can be argued that simply allowing dominant actors to emerge in the media system is already problematic. As Baker (2007: 16, original emphasis) argues, concentration of media ownership creates the possibility of enormous, unchecked power, and 'even if this power were seldom if ever exercised, the democratic safeguard value amounts to an assertion that no democracy should risk the danger'. Instead, the media should be structurally egalitarian to allow a wide and fair dispersal of power and equal opportunities to exercise influence for different actors in society.

In line with this, it can be argued that media pluralism policies in the digital environment should be primarily about dispersing the communicative power of the dominant actors and the creation of counter powers, instead of only alleviating some of the harms associated with that power (see Helberger 2020). This is perhaps the most fundamental problem with digital platforms, which also underlies many of the other problems. However, it is not necessarily the one emphasized in policy discourses because it is much more difficult to solve than the other problem definitions discussed above. Potential solutions offered to the concentration of platform power can include breaking up dominant platform companies, preventing certain anti-competitive practices, or creating alternative, countervailing powers. As Helberger (2020: 849) notes, however, competition law is suited to deal with opinion power only to a limited degree. Instead, linking this problem definition to effective solutions would require reconceptualizing media concentration policy in ways that go beyond current measures of audience reach or ownership limitations.

Discussion

Media pluralism and diversity are notoriously contested concepts that have different meanings in different contexts, so much that they have traditionally been used to argue for a range of policies that can be mutually contradictory. Attempts to promote one form of pluralism through policy measures may well undermine other forms of pluralism. If addressing media pluralism with common European policy and finding evidence to support it has been 'a Sisyphean task' before (Picard 2017), there is no reason to think that platformization makes the task easier.

Problem definitions guide policy discourses and shape the options available to policymakers. There is a need, therefore, to critically examine the political rationalities of current policy debates and the assumptions about media pluralism that underlie those debates. Currently, those assumptions are rarely expounded in policy discourse. Problematization of the crisis of legacy media, algorithmic manipulation, lack of transparency and the concentration of power, each implies different political rationalities, and therefore shapes the policy discourses and expectations placed on policymakers.

These four problem categories are not comprehensive, and they also overlap to a significant degree. Yet there are also potential tensions and contradictions between them and their assumptions regarding media pluralism as a media policy goal. These tensions are reflected, for example, in the fear that measures that focus on the relationship between digital platforms and traditional media or technological solutions to the governance of algorithms may end up reinforcing the role of already dominant actors rather than dispersing communicative power.

It can also be argued that focus on these problem definitions may divert attention away from other major problems or contribute to lack of a more coherent overall framework for regulating the digital platforms and media pluralism. Van Dijck (2021), for example, has argued that the EU approach to platforms has failed to 'see the forest for the trees', because it has focused on individual issues, instead of a more holistic, principle-based approach. Similarly, other scholars have called for a more coherent overall approach to platform policy, driven by clearly defined normative principles and policy goals (Helberger 2020).

However, the point here is not to argue for one problem definition over the others, or to judge any of them as unfounded. The broader aim of the chapter is to illustrate that problem definitions do not emerge naturally, as neutral reflections of empirical reality, but they are social constructions, shaped by public debates, available metaphors and concepts, media coverage and individual events, and often different stakeholders' strategic attempts to frame policy debates in a particular way. These problem definitions also have influence on policy outcomes by guiding policy-makers considerations, available options, and legitimating policy approaches or evaluation criteria.

It has been noted before that policy discourses on technology tend to suffer from a more general problem of inconsistent or poorly defined policy aims and values, which can lead to regulatory complexities (Barrett et al. 2021). The public shock-driven nature of policy discourses, the influence of interest groups, reliance on metaphors, and the general uncertainty about future development of the digital media environment can all contribute to the problem of inconsistent problem definitions and objectives. Further discussion on the relationship between media pluralism and the digital platforms thus requires conceptual clarity as well as empirical research on the actual impact of proposed regulations.

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