Communication Policies and Media Systems: Revisiting Hallin and Mancini's Model

Edited by Aurora Labio-Bernal, Rainer Rubira-García, and Rasa Poceviciene

Academic Editors

Aurora Labio-Bernal (University of Seville)

Rainer Rubira-García (Rey Juan Carlos University)

Rasa Poceviciene (Šiauliai State Higher Education Institution)

Table of Contents

Cogitatio

Comparing Media Systems: A New Critical Academic Reading

Aurora Labio-Bernal [1] , Rainer Rubira-García [2] , and Rasa Pocevicienė [3]

[1] Department of Journalism II, University of Seville, Spain
[2] Department of Audiovisual Communication and Advertising, Rey Juan Carlos University, Spain
[3] Department of Management and Communication, Šiauliai State Higher Education Institution, Lithuania

Correspondence: Rainer Rubira-García (rainer.rubira@urjc.es)

Abstract

The year 2024 marks the 20th anniversary of the publication of *Comparing Media Systems* (2004), by Daniel C. Hallin and Paolo Mancini, a book that established three major media models in the Western world. Subsequently, the same authors published *Comparing Media Systems Beyond the Western World* (2011), which extended the work to other countries such as Russia, Poland, and China. In both cases, the interest was in the comparative analysis using a series of variables that made it possible to classify the media structures of the countries into differential groups. For their analysis, the authors included different study categories that need to be reinterpreted considering technological evolution, changes in consumption habits, or the irruption of social networks. This thematic issue is a proposal for a review of media models in different countries and aims to be a starting point for future lines of research on this subject. A total of 10 articles are presented to address an academic debate on the scientific relevance of Hallin and Mancini's work, its contribution to comparative media studies, and its necessary re-reading in a historical-temporal framework different from the moment in which it was published.

Keywords

communication models; comparative studies; critical analysis; Hallin; Mancini; media systems; political economy

1. Introduction

Hallin and Mancini (2004) established in their book *Comparing Media System* three major blocks: the polarized pluralism model, which included Greece, Spain, Portugal, Italy, and France; the corporate

democratic model, which included Belgium, Germany, Austria, the Netherlands, Switzerland, Finland, Denmark, Norway, and Sweden; and the liberal model, to which Great Britain, Ireland, Canada, and the US belonged. Two decades later, technological changes and the evolution of economic and systemic dynamics recommend a new reading of the information structure to test the validity of the models. Thus, the development of the media market or political parallelism, as well as the evolution of journalists' professionalism and state intervention are appropriate issues to continue describing media models, but they are seen as limited variables in a global context. The emergence of the Netflix business model has led to a boom in online platforms, which has displaced traditional media in pursuit of other digital initiatives (Lobato, 2018). At the business level, changes in the sector also show that new developments are taking place in content consumption, establishing an alliance between internet operators, telecommunications, and traditional media companies (Birkinbine et al., 2016). Meanwhile, in the press sector, there is evidence of the weakening of paper newspapers and the search for paid or subscription business models, as well as the incorporation of the online-only press as new political agents (Labio-Bernal & Pineda, 2016).

The present thematic issue takes up the final recommendation of Hallin and Mancini's (2004, pp. 302–303) work that recognized the exploratory nature of their book and encouraged further studies in the face of a foreseeable scenario of homogenization of media systems characterized by secularization, the trend towards the liberal model and commercialization, which raises tensions between the market and democracy. Furthermore, in *Comparing Media Systems Beyond the Western World*, the authors themselves recognized, following Humphreys (2009), that "we did not want to encourage the reduction of comparative analysis to a categorization of cases, in which a label becomes a substitute for 'more concrete explanation'" (Hallin & Mancini, 2011, p. 300). We cannot forget, likewise, the recommendation made by Paolo Mancini when he stated that "the idea of media system itself must be readapted and reshaped to the new media ecology" (Mancini, 2020, p. 5761). Thus, the scientific anniversary offers us the opportunity to review and study, from a more current and complex perspective, the proposal made by Hallin and Mancini in 2004. The objective of this monograph, in which they analyze some cases, allows us to continue to legitimize the validity of the models, not as unique categories but as a basis that allows us to delve into the characteristics of different media structures.

2. Notes on the State of the Art

As a starting point, we consider it important to analyze the quantitative impact on the scientific production of the work. In this sense, the article by de la Mata et al. (2024) with which this monograph begins is an excellent example of the evolution and interpretation of the Hallin and Mancini model by the scientific community, both in terms of its strengths and limitations and potential areas for development. It is a bibliometric work, based on the analysis of almost 3,500 articles published in Web of Science, which have dealt with Hallin and Mancini's proposal and which offers us an interesting x-ray of the areas, authors, and types of studies that have been developed in this respect. The authors use a software tool, SciMATT, developed by Cobo et al. (2011), to analyze the sample of articles between 2004 and 2022, although they divide them into three periods that they justify scientifically and that make a more comprehensive reading of the results. The importance of public opinion, democratic quality, and political and technological changes gravitate toward the themes that connect with political communication, the importance of the media, and citizen participation when studied under the prism of Hallin and Mancini's model. Interesting findings are found on studies that insist on the adaptation of this theory to current circumstances, dominated by globalization and cross-border technological development.

3. A European Perspective

The article by Lorena R. Romero-Domínguez (2024) is included in this monograph on the challenges that cross-border investigative journalism poses for studying the media models proposed by Hallin and Mancini. The author performs a quantitative analysis, through an automated content analysis, on the conceptualization of this type of journalism in the successive editions of the European Investigative Journalism Forum, Dataharvest, between 2014 and 2023 through about 1,000 documents containing the summaries of the sessions. The idea that journalism today also develops through cross-border network models where different traditions, narratives, and practices come together serves as a basis to support the renewal of the classical theory that, supported by Hallin (2020) himself, understands as fundamental the impact of transnationalization and the internet. An interesting aspect of the article focuses on demonstrating the existence of other types of journalistic organizations linked to foundations, as well as a transnational parallelism focused on making visible issues such as human rights in the European framework and an objective less linked to business and more to independence.

By countries, the work of Fernández-Viso and Fernández-Alonso (2024) analyzes the communication policies and regulatory bodies in Spain, France, and Portugal to study the changes in the so-called Mediterranean model. The evolution of the sector over the last 20 years leads the authors to propose a review of state intervention in the three countries, focusing especially on the governance of public media, the role of independent regulatory bodies, and funding through state advertising. The methodology, of a qualitative nature, has been carried out through the analysis of legal texts, organizational charts, and reports of regulatory bodies and, finally, a review of public and critical information on media subsidies in the three countries. The study concludes by confirming the prevalence of the polarized pluralism model with a strong presence of government intervention in the Mediterranean media systems studied.

The article by Wandels et al. (2024) offers an interesting point of view by offering a comparison between the Northern European model of Belgium and the liberal model represented by the US through an evolutionary analysis over time, specifically between 1980 and the present day. From a critical perspective and taking as a fundamental basis the development of neoliberalism and its impact on journalism, the authors carry out an exploratory qualitative analysis of the two case studies mentioned in the context of the last decades. The intellectual approach of the field theory developed by Bourdieu (2005) is fundamental to understand, according to the authors, how journalistic *doxa* is marked by the power logics of neoliberal hegemony and the dominant thinking on both sides of the Atlantic. The methodology has been developed through semi-structured interviews with editors, section chiefs, and US and Flemish journalists. In addition, this information has been triangulated with other sources, such as records, company data, autobiographies, and other literature, using NVIVO software to categorize everything.

The article by Lombao et al. (2024) delves into one of the variables of the model: political parallelism in the media (or the degree of influence of parties), in this case, governments, on the public media in the EU. These authors also study other aspects: the intervention and development of regulation, at the national and supranational level; financing and audiences, as well as structural and management changes in these public systems. They also focus on the variation in professional culture and the evolution of the concept of public service of these media in the digital context. All this to discover, finally, those novelties in the national public media two decades after the description made by Hallin and Mancini. The authors study these variables in all EU countries, except for

Malta and Luxembourg, with references even to Great Britain, between 2011 and 2021, offering quantitative data on the development of audiences, funding, governance, and pluralism. Despite the diversity of countries, the authors draw interesting conclusions regarding the degree of political dependence of Public Service Media in the EU. The article is thus a wake-up call for all European governments and their public services, highlighting, in this regard, the conclusions drawn from the Media Pluralism Monitor that place most countries between medium and high risk in terms of pluralism in public media.

4. Changes in Eastern Europe

An important part of the review of the proposed models is found in the study of the media systems of what is known as Eastern Europe since the 1990s. Bălășescu et al. (2024) thus carry out an analysis of commercial television in Romania and Bulgaria in relation to the political and governmental framework in both countries, taking into account their recent incorporation into the group of democracies after the long communist period. The authors thus consider that, in spite of the mixture of different elements, both countries can be defined within the model of polarized pluralism. The study reviews the introduction of commercial television in both cases, as well as a description of its financing and consumption. Of special interest is the section on the analysis of the journalistic profession, detecting a limitation of informative practice and freedom of expression. Commercial television, in both countries, presents many similarities that connect with pressures coming from both the political and economic business spheres.

To complete this study, Botan's (2024) article tests the credibility and quality of journalism in Romania through a mixed qualitative methodology that uses both secondary data and other data extracted from surveys and in-depth interviews (with politicians related to media regulation and journalists). The authors confirm a high level of political and business intervention in news reporting, which erodes public trust and compromises professional ethics and the democratic quality of the country. The article takes as inspiration Hallin and Mancini's proposal, but the authors consider it fundamental to problematize the model to national contexts and, specifically in this case, to the reality of Romania, taking into account the multifaceted changes related to the digital market, commercialization, and post-communist heritage.

These studies on the so-called Eastern Europe are completed by Izquierdo-Iranzo and Sayadyan (2024), who present the case of the media system in Armenia. The authors rightly provide a socio-historical context of the country and claim the opportunity of a case study of a state that does not normally occupy academic attention. The methodology uses interviews with 20 media representatives, academics, and experts as a fundamental tool. The variables on which these testimonies have been worked are media structure, political parallelism, journalistic professionalism, and state intervention, all taken from Hallin and Mancini's proposal. The characteristics of the country offer a clientelist media model that fits with that of polarized pluralism and offers very particular nuances, such as the existence of an Armenian media market through communities created through the diaspora, although the authors also take into account new variables related above all to technological evolution.

5. Beyond the Western World

Halfway between Europe and Asia, Akser and Baybars (2024) analyze in this monograph the case of Turkey as a country where the relationship between media and power is a matter of concern. The authors take as

variables for their work the increase of political parallelism, the erosion of journalistic professionalism, and the role of the state connected also with corporations. The thesis of the work maintains that the evolution of the media system in Turkey, especially after 2011, has produced a capture of the sector by the political-corporate power, moving from a model of polarized pluralism to absolute polarization. The work even highlights intimidation tactics, on the part of the state, against those media and information professionals who oppose the government. The result of all this contributes to a professional practice that moves away from ethical sense and social function to work at the service of political-economic interests and disinformation.

This issue closes with an article by Jones and Hadland (2024) which raises an interesting critique of the work of Hallin and Mancini for the case of South Africa, considering its characteristic of a young democracy within the Global South. The article also aims to overcome the idea of a possible "Africanization" of the theses of the three models raised through the subsequent study by Hadland (2012) to provide an update on the relationship between media and politics in the country. To explain these issues, the authors take into account the works of Rodny-Gumede (2015a, 2015b, 2020) and Wasserman (2020) that explain the changes and challenges in the last decade, both internally and in the international context, in the media landscape in South Africa. The authors focus on highlighting problems that occurred in the country, such as the censorship and discrediting processes that occurred against journalists between 2014 and 2017 carried out by the Bell Pottinger company to destabilize the political system. They also criticize the corporate capture and political subordination of different media outlets as a form of "South African state capture," which directly affected social peace and democracy. The authors also delve into the study of the media market and political parallelism, identifying a high degree of government clientelism in both private and public media, which seems to lead the country toward the idea of polarized pluralism. However, the authors conclude by pointing out that, despite the importance of the theses of Hallin and Mancini (2004, 2011; see also Hallin et al., 2021), both in their early and later studies, and the work of Hadland (2012), it is more appropriate to apply a hybrid model and create a new typology not centered on the West but on the complex postcolonial context.

6. Conclusion

It is beyond any discussion that Hallin and Mancini's work is a world reference for media studies with a comparative perspective. In this sense, the review proposed here is more than a critique of the work, but a new academic reading of the exceptional contribution made by these authors in 2004. This thematic issue does not include all the countries analyzed previously, but we do include an interesting sample that allows us to analyze issues such as technological changes, political polarization in a hybrid media system, new audiovisual actors, the transformation of the press business model, and the situation of public media in the digital context. We propose perhaps, as a future line of work, to produce a new monographic issue that expands with more African countries and also includes research from Latin America and Asia.

Conflict of Interests
The authors declare no conflict of interests.

References

Akser, M., & Baybars, B. (2024). Media systems and media capture in Turkey: A case study. *Media and Communication*, *12*, Article 7733.

Bălășescu, M., Angelova, V., & Surugiu, R. (2024). Commercial television as a blind spot in emerging media systems: Romania and Bulgaria's cases. *Media and Communication*, *12*, Article 7765.

Birkinbine, B., Gómez, R., & Wasko, J. (Eds.). (2016). *Global media giants*. Routledge.

Botan, M. (2024). The Romanian media system: Dynamics, challenges, and implications for democracy. *Media and Communication*, *12*, Article 7847.

Bourdieu, P. (2005). The political field, the social science field, and the journalistic field. In R. Benson & E. Neveu (Eds.), *Bourdieu and the journalistic field* (pp. 29–47). Polity Press.

Cobo, M., López-Herrera, A., Herrera-Viedma, E., & Herrera, F. (2011). An approach for detecting, quantifying, and visualizing the evolution of a research field: A practical application to the fuzzy sets theory field. *Journal of Infometrics*, *5*(1), 146–166.

de la Mata, D. C., Guede, J. R. S., & Blanes Sebastián, M. C. (2024). Hallin and Mancini: Two decades of influence in politics and communications. *Media and Communication*, *12*, Article 7695.

Fernández-Viso, A., & Fernández-Alonso, I. (2024). The evolution of government intervention in the Mediterranean media system: Spain, France, and Portugal. *Media and Communication*, *12*, Article 7738.

Hadland, A. (2012). Africanizing three models of media and politics: The South African experience. In D. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 96–118). Cambridge University Press.

Hallin, D. C. (2020). Comparative media studies in the digital age: Comparative research, system change, and the complexity of media systems. *International Journal of Communication*, *14*, 5775–5786. https://ijoc.org/index.php/ijoc/article/view/14550/3274

Hallin, D. C., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (Eds.). (2011). *Comparing media systems beyond the Western world*. Cambridge University Press.

Hallin, D. C., Mellado, C., & Mancini, P. (2021). The concept of hybridity in journalism studies. *The International Journal 391 of Press/Politics*, *28*(1), 219–237. https://doi.org/10.1177/19401612211039704

Humphreys, P. (2009, November 6-7). *A political scientist contribution to the comparative study of media systems in Europe: A response to Hallin and Mancini* [Paper presentation]. 2009 ECREA Communication Policy and Law Workshop, Zurich, Switzerland.

Izquierdo-Iranzo, P., & Sayadyan, L. (2024). Armenian media system overview according to the Hallin and Mancini model. *Media and Communication*, *12*, Article 7850.

Jones, B., & Hadland, A. (2024). South African media and politics: Is the three models approach still valid after two decades? *Media and Communication*, *12*, Article 7723.

Labio-Bernal, A., & Pineda, A. (2016). Leftward shift, media change? Ideology and politics in Spanish online-only newspapers after the 15-M Movement. *International Journal of Communication*, *10*, 2661–2682. https://ijoc.org/index.php/ijoc/article/viewFile/5195/1672

Lobato, R. (2018). Rethinking international TV flows research in the age of Netflix. *Television and New Media*, *19*(3), 241–256. https://doi.org/10.1177/1527476417708245

Lombao, T. F., Blasco-Blasco, O., & Freire, F. C. (2024). Politicisation persists and is increasing in European public service media in the digital society. *Media and Communication*, *12*, Article 7759.

Mancini, P. (2020). Comparing media systems and the digital age. *International Journal of Communication*, *14*, 5761–5774. https://ijoc.org/index.php/ijoc/article/view/14553/3273

Rodny-Gumede, Y. (2015a). An assessment of the public interest and ideas of the public in South Africa and the adoption of Ubuntu journalism. *Journal of Mass Media Ethics*, *30*(2), 109–124. https://doi.org/10.1080/23736992.2015.1020379

Rodny-Gumede, Y. (2015b). Re-conceptualizing the analysis of media development and trajectories hereof in post-colonial societies. *Global Media and Communication*, *11*(2), 131–146. https://doi.org/10.1177/1742766515588416

Rodny-Gumede, Y. (2020). Expanding comparative media systems analysis from transitional to postcolonial societies. *International Communication Gazette*, *82*(7), 611–627. https://doi.org/10.1177/1748048519897515

Romero-Domínguez, L. R. (2024). Redefining Hallin and Mancini's media system: Cross-border investigative networks in Europe. *Media and Communication*, *12*, Article 7712.

Wandels, N., Mast, J., & Van den Bulck, H. (2024). Comparing media systems through the lens of neoliberal hegemony: Evidence from the US and Flanders. *Media and Communication*, *12*, Article 7792.

Wasserman, H. (2020). The state of South African media: a space to contest democracy. *Publizistik*, *65*, 451–465.

About the Authors

Aurora Labio-Bernal holds a PhD in Journalism and is a tenured lecturer at the University of Seville. She is the director of the Media, Communication Policies, and Democracy in the European Union research group. Her research has focused on the political economy of communication. She has been a visiting researcher at the Observatory of Communication Policies (Universitat Autònoma de Barcelona) and at the Communication and Media Research Institute (University of Westminster).

Rainer Rubira-García holds a PhD in Communication from Rey Juan Carlos University, in Madrid, Spain, with top qualification, cum laude, International Mention and Extraordinary Doctorate Award. He is currently head of the UNESCO Chair in Communication Research at Rey Juan Carlos University. He has been a professor at: Fairfield University, Connecticut, USA; Šiauliai State College, Šiauliai, Lithuania; the Complutense University of Madrid; the Central University of Ecuador; and the University of Havana, both in undergraduate and postgraduate levels. He is a member of Orbicom, ECREA, and AE-IC.

Rasa Pocevicienė, head of the Studies and Science Coordination Unit at Šiauliai State College in Lithuania, has a long history of service at her university, with more than 20 years of teaching and research experience. Of note is her active participation in the Electronic Platform dedicated to Adult Education in Europe (EPALE). From 2015 to date she has been an outstanding member of educational innovation projects, twice being a recipient of The Duke of Edinburgh's International Award.

cogitatio

Hallin and Mancini: Two Decades of Influence in Politics and Communications

Daniel Corral de la Mata , **José Ramón Sarmiento Guede** ,
and **María García de Blanes Sebastián**

Department of Business Administration, Rey Juan Carlos University, Spain

Correspondence: José Ramón Sarmiento Guede (joseramon.sarmiento@urjc.es)

Abstract

Since its publication in 2004, Hallin and Mancini's model has become a pioneer in understanding the dynamics of media systems in different national contexts. Many studies related to politics that identify the patterns, trends, and variations used by communication systems in different countries and historical moments follow this seminal study to evaluate the formation of public opinion and the quality of democracy. For this article, we obtained 3,455 articles published in Web of Science within the Social Sciences Citation Index using the open-source software Science Mapping Analysis Tool, which we chose as a bibliometric technique for its feasibility in providing a conceptual structure through the spatial representation and disciplinary interrelation with fields like specialization, studies, and authors. By analyzing the co-occurrence of keywords, we drew scientific maps that enable the analysis of their conceptual and social evolution over consecutive periods. The results provide up-to-date information on the state of the model and its relevance in the field of communication and policy today, its strengths, limitations and potential areas of development. The findings identify less studied areas in the field, drawing inspiration from the Mancini model. This opens up a guide for future research by identifying themes and questions through bibliometric analysis.

Keywords

bibliometrics; clustering; network analysis; pluralism; political parallelism; professionalization; scientometrics

1. Introduction

Communication plays a fundamental role in contemporary society, especially in the context of politics and the formation of public opinion. Understanding how media systems interact with the political and social sphere is essential to address critical issues related to democracy, citizen participation, and media influence. In this context, the model developed by Hallin and Mancini (2004) has been a fundamental reference in research on media systems and their relationship with politics.

Since its publication, numerous studies have been devoted to identifying patterns, trends, and variations in the use and application of this model in different countries and historical moments. Research around Hallin and Mancini's model has contributed significantly to our understanding of how media systems reflect and shape political and social dynamics.

This study will conduct a comprehensive bibliometric review of academic research related to the Hallin and Mancini model. The Web of Science tool provided a source of 3,455 articles published in the Social Sciences Citation Index category that address this theoretical model in the context of communication and politics. In addition to assessing the current state of research, this study will seek to identify research patterns, conceptual evolution, and areas of research. The strengths and limitations of existing research will also be examined. Bibliometric analysis will provide an up-to-date view of the relevance of Hallin and Mancini's model in the field of communication and policy while offering guidance for future research and standing as a useful tool for bibliometric analysis in this field. We aim to contribute to a deeper understanding of the influence of the media on the formation of public opinion and democratic quality in different national contexts. Concerning research objectives, the study proposes the following:

> RO1: Conduct a comprehensive bibliometric review of articles published in Web of Science that address the Hallin and Mancini model in the context of communication and policy.

> RO2: Identify research patterns, such as more frequent subject areas and less studied areas, in articles related to the Hallin and Mancini model.

> RO3: Use the Science Mapping Analysis Tool (SciMAT) to graphically represent the conceptual and social evolution of the Hallin and Mancini model over consecutive periods.

> RO4: Assess the strengths and limitations of existing research on the Hallin and Mancini model, including its relevance in the current field of communication and policy.

> RO5: Provide guidance for future research by identifying emerging research issues and questions in the context of the Hallin and Mancini model.

This article will be divided into five sections. The introduction and the research objectives are presented first. In the second section, a review of the existing literature on the precursor theories of the Hallin and Mancini model is made to finish analyzing and comparing the influence that media systems develop on public opinion and how politics has been conducted in different policies. In the third section, the methodology used is explained; specifically, the research standards are established as the methods and instruments of data

collection and analysis. In the fourth section, the results are presented and compared with what other authors have written. The fifth section concludes with implications of the study and future lines of research.

2. Theoretical Framework

2.1. Precursor Theories

The I World War marks the first use of propaganda in a modern environment that is sensitive to communication. The Committee on Public Information in the US is important for the recognition and acknowledgment of propaganda, both for the success of its work and for providing its means and toolkit. Bernays (1928), author of the book *Propaganda*, is the member who facilitated this committee to put much knowledge into practice. Considered one of the fathers of public relations, he argues that propaganda is a powerful tool for influencing public opinion through media communication and should be linked to the discussion about the role of the media in shaping public opinion in different political systems. Bernays' book was a key document during the early years, along with another essential study, *Propaganda in the World War* (Lasswell, 1927), which discusses the use of propaganda as a strategic tool to mobilize the population and justify US involvement in the war.

Bernays' (1928) work is also linked to much of the work of W. Lippmann, who is also a member of the commission. An influential journalist and political commentator, Lippmann (1923) focussed his work "Public Opinion" on the idea that public opinion is a mediated construct. He suggests that most people rely on the media to form their opinions on political matters.

Siebert et al.'s (1956) "Four Theories of the Press" was developed three decades later and focuses on theories of the press in different political systems, including authoritarian, libertarian, social responsibility, and Soviet communist. It is necessary to bear in mind that these theories were developed in a Cold War context, where different approaches to the media were examined in different political systems. The theories of Siebert et al. (1956) could be considered an initial framework for understanding how media are conceptualized in different political systems.

2.2. Hallin and Mancini's Model

Hallin and Mancini's (2004) book *Comparing Media Systems: Three Models of Media and Politics* noted that media plays a crucial role in shaping public opinion and in the way politics is conducted in different countries. The main objective of the book was to analyze and compare media systems in different countries of the Western world, focusing on three main models:

1. The liberal model, which is characterized by a high degree of press freedom and private ownership of the media, and typically associated with countries such as the US and other Western countries.

2. The corporate democratic model, which is based on cooperation between the government, political parties, and the media. This model has been commonly associated with European countries such as Germany, the Netherlands, and the Nordic countries.

3. The polarised model of Northern Europe, which is characterized by strong competition between private media and a marked political polarization in content. The media tend to be linked to political parties and to adopt clear and defined political positions. This model has been commonly associated with northern European countries, such as Denmark, Sweden, Norway, and Finland.

Hallin and Mancini (2011) acknowledged that their first book had a limited geographical focus and did not consider media systems outside the high GDP countries area (considering the Human Development Index). They expanded their analysis, although without the impact on the academic world of their previous work, to provide a more complete understanding of the global diversity of media systems, developing a new model in their new workaround, *Comparing Media Systems Beyond the Western World*; the main objective of the book is to analyze and compare media systems in different countries, focusing on three main models:

1. Polarized system: In this system, the media tend to be strongly linked to political parties or interest groups. The media can be used to promote specific political agendas, as illustrated in Italy and Venezuela.

2. Pluralistic system: In this system, there is a diversity of independent media, and media ownership is mainly private, with a high degree of press freedom. The US and the UK are mentioned as countries where these circumstances occur.

3. State or Authoritarian System: In this system, the state has significant control over the media, which may be state-owned or subject to strict government regulation. China and Russia are examples of highly controlled media systems, with significant censorship and limited press freedom.

Although the model proposed by Hallin and Mancini (2004) has been widely used and discussed in the field of political communication and media studies, it has also received some criticism, some of which has been acknowledged by the authors themselves (Hallin & Mancini, 2013), as it applies to (a) their link to 18 specific cases analyzed without extending the scope of the analysis beyond them, (b) their study as a starting point upon which other researchers could "build," forward, and not simply "apply" it, and (c) their concern with those who believe that the model may be somewhat simplistic, but it underpins useful areas as a starting point for thinking about the similarities and differences in the development patterns of media systems.

Hallin and Mancini (2017) published a paper called "Ten Years After Comparing Media Systems: What Have We Learned," in which they point out that comparative media analysis has advanced significantly, especially in the development of qualitative indicators of key concepts for this last decade. However, they still consider important elements that they intended to instill in the original study, in particular, better methodological pluralism and a theoretical reflection on the nature and development of systems and how the results of different quantitative studies could be gathered.

2.3. Research Gaps and Research Questions

This stated interest in Hallin and Mancini's (2017) model and differing approaches in recent years spurs a need for a line of research and analysis based on bibliometrics, specifically for the scope of our case scenario in the field of politics and communications. In this article, we address this bottom-line groundwork and established research questions through a review of the literature, as follows:

RQ1: What is the current state of academic research related to the Hallin and Mancini model in the field of communication and politics?

RQ2: What are the patterns and trends identified in the 3,455 papers published on Hallin and Mancini's model in Web of Science?

RQ3: What are the least studied areas or underrepresented subtopics in research related to the Hallin and Mancini model?

RQ4: What are the strengths and limitations identified in existing research on the Hallin and Mancini model?

3. Methodology

One of the ways to obtain a plausible outcome from the research questions is to carry out a longitudinal study of scientific production in the field of research. From this point of view, bibliometrics is relevant because it allows us to track the evolution of research topics in such a way that we can understand how research priorities and approaches evolve over time. Similarly, by analyzing scientific output over a long period, one can assess the lasting impact of certain articles, authors, or institutions in the field. Additionally, bibliometrics can help identify key moments in a field's history, such as important discoveries, technological advances, or changes in research trends. Finally, a longitudinal bibliometric analysis aids academic institutions and researchers in strategically planning their future research and resources, identifying areas that have experienced rapid growth or may require more attention.

Bibliometrics is a discipline that is responsible for applying statistical methods to the study of the production, dissemination, and use of scientific information in a specific field of knowledge (Ellegaard & Wallin, 2015). Its main objective is to measure and analyze various aspects of bibliographic production, such as the number of publications, citations received, collaborations between authors, and trends in different areas of knowledge. The two main bibliometric approaches are citation analysis and scientific mapping. The first approach focuses primarily on analyzing the citations received by different scientific documents, aiming to evaluate the influence, impact, and visibility of documents and authors in a given area of research. Scientific mapping is a methodology used to visualize and analyze structure, evolution, and interconnections within scientific research (Cobo et al., 2011). To understand the influence of Hallin and Mancini's work over time and the reviews and applications made in the last two decades, the bibliometric study aims to graphically represent how research areas, authors, scientific papers, and other entities within a particular field relate to each other.

To address this extensive area, the open-source software SciMAT, created by Cobo et al. (2011), synthesizes both procedures, analysis, and mapping. SciMAT combines bibliometrics and network analysis to visualize and analyze the structure and evolution of a scientific field over time. The latter technique aims to observe and break down a scientific field to understand its structure, trajectory, and main actors (Ramezani et al., 2014). SciMAT involves the construction of a matrix of keywords by documents and the creation of a co-occurrence matrix that reflects the internal connections and interlinking. This co-occurrence of links occurs when two keywords coexist in a paper, facilitating the identification of central topics in a field and reflecting their conceptual and cognitive dimensions (Cobo et al., 2011; Paule-Vianez et al., 2020). Then,

through dimensional reduction techniques and clustering algorithms (Cobo, 2012), two-dimensional scientific schemes originate. These schemes situate the themes considering their centrality (x-axis) and density (y-axis): centrality refers to the relative importance or influential position of a node (element) within a network (in the context of SciMAT, a node represents a field of research, an author, a scientific article, or an institution); and density refers to the measure of connection between nodes in a network (in the context of SciMAT, density indicates to what extent research fields are interconnected or how much collaboration exists between authors in a specific area).

Both indicators, taken together, provide a comprehensive view of the importance and cohesion of a topic (Cobo et al., 2014). These topics can be grouped according to: (a) leading themes or engines that are relevant and highly cohesive, located in the upper right quadrant (strong centrality and density)—they are well-developed and important in the scientific field; (b) specialized topics that are of marginal importance and are located in the upper left quadrant (low centrality, high density)—they are highly developed themes, although isolated from the rest; (c) emerging or disappearing themes that are located in the lower left quadrant (low centrality and density)—these topics are very little developed and scarcely related to the rest; and (d) basic or transversal themes that are topics very related to the rest but that are not sufficiently developed and are located on the lower right quadrant (high centrality and low density).

In short, SciMAT is a particularly valuable tool for decision-making, identifying opportunities for collaboration, and understanding the dynamics of scientific production.

3.1. Data Analysis

Web of Science is the source database for bibliometric analysis, which was selected because it is one of the repositories with the most important scientific journals in the areas of sciences, social sciences, and arts and humanities (Hörisch & Tenner, 2020). The Social Sciences Citation Index has a determined fund for Web of Science, containing literature reviews, minute books, and meeting summaries, and these were discarded; redundancies were eliminated for the analysis. The data, collected in August 2023, locates only articles published from 2004, the date of publication of the seminal book discussed earlier, using 2022 as the cutting year. Specifically, the search equation used was as follows: (ALL=("Hallin and Mancini") OR ALL=("media systems") OR ALL=("models of media and politics") OR ALL=("political communication*") OR ALL=("polarized pluralist model") OR ALL=("democratic corporatist model") OR ALL=("liberal model")) AND (DT==("ARTICLE" OR "EDITORIAL MATERIAL" OR "EARLY ACCESS" OR "REVIEW") AND PY=(2004–2022)).

4. Analysis and Discussion of the Results

In this section, the findings are presented in detail. The results in Table 1 show a total of 3,810 publications identified within the Web of Science database. In the study, we will refer exclusively to the 3,455 publications that are part of the Social Sciences Citation Index. The information obtained is classified into three periods of analysis for a longitudinal study. The first period covers 2004 to 2010; the second covers 2011 to 2019; and the third covers 2020 to 2022. Each of these periods is defined according to the literature reviewed. We decided to end the first of these periods in 2010, according to Cumming and Johan (2017) and Gurău and Dana (2020), who point out that the financial crisis of 2008 (which had its final effects in 2010) can be considered a relevant turning point in the analysis of the financial world with its

corresponding derivations in political issues and ultimately communication. For the second period, we have taken into consideration the Covid-19 outbreak, with its unequivocal impact on many aspects of society, including research. Finally, the study of the last three years will clearly delineate the most recent advances in the subject under analysis. Our study will lay out the illustrations and diagrams for presenting the strategic data and insight relevant to the timeline and several areas of knowledge; these clusters are grouped in a progression line as they evolved through time to define future and potential lines of research and for opening and creating opportunities. The evolution of the themes that make up the clusters observed for each period will determine additional cross-cutting themes and future lines of research and action.

Table 1. Web of Science Index.

Index	No. articles	%
Social Sciences Citation Index	3,455	91%
Arts and Humanities Citation Index	183	5%
Science Citation Index Expanded	120	3%
Conference Proceedings Citation Index–Social Science and Humanities	45	1%
Conference Proceedings Citation Index–Science	5	0%
Book Citation Index–Social Sciences and Humanities	2	0%
Total	3,810	100%

4.1. Analysis of the Performance of Scientific Production

According to Figure 1, the first period, which covers a total of seven years (37% of the total), accounts for 16% of the publications. In the last third of this period, there is an increasing trend in scientific production (37% of the total). The growing trend is consolidated in the second period analyzed, covering 47% of the analyzed years and bringing together 56% of the articles. In this case, the last third accounts for 49% of the studies, which shows an increase in recent years. The third period, which covers the last three years of the study (16% of the total), accounts for 29% of the publications. In this case, it can be seen that after reaching a maximum in 2020, the years 2021 and 2022 show a decrease in scientific production.
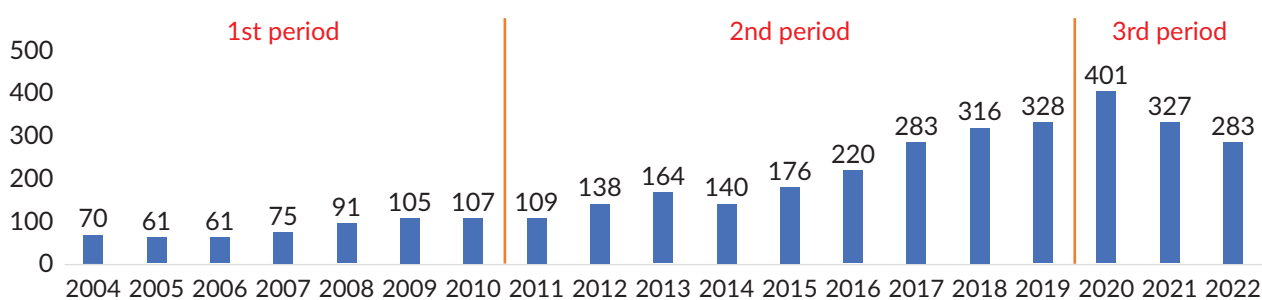
Figure 1. Yearly evolution of published articles.

Regarding the analysis of the authors' performance, Table 2 shows that Esser et al. (2012) from the University of Zurich, Switzerland, specializes in works on international and comparative media research, being the author with the highest scientific production. Jesper Strömbäck, University of Gothenburg, Sweden, and Rens Vliegenthart, Wageningen University & Research, the Netherlands, who specializes in

political communication, follow in the ranking of articles. As far as the ranking of citations is concerned, only the first of the mentioned authors appears in the top five, in fourth place. The first two positions go to James N. Druckman and Dennis Chong, Northwestern University, Illinois, US, specializing in political science. In third place, is a scholar from the University of Washington, Seattle, US, W. Lance Bennett (2013), who specializes in digital media, political communication, and social movement.

Table 2. Ranking of publications and authors.

Authors with the most articles			Authors with the most citations		
Authors	No. articles	No. citations	Authors	No. articles	No. citations
Frank Esser	26	1,567	James N. Druckman	10	2,329
Jesper Strömbäck	20	932	Dennis Chong	1	1,773
Rens Vliegenthart	20	696	W. Lance Bennett	8	1,614
Claes H. de Vreese	19	1,127	Frank Esser	26	1,567
Anders Olof Larsson	17	541	Shanto Iyengar	9	1,297
Tamir Sheafer	17	1,011			
Michael Hameleers	15	546			

A close look into journals and papers from proceedings reveals the topics focusing and investigation carrying up to five journals, representing the highest scientific production at 31% (Table 3). Political communication is the most relevant, encompassing 18% of the total. All journals are directly related to the field of communication and, in some cases, more specifically, to communication in the political field.

Table 3. Journals: Highest production.

Journal	No. articles	%	Year of volume 1
Political Communication	611	18	2004
International Journal of Communication	136	4	2009
Profesional de la Información	105	3	2016
International Journal of Press-Politics	105	3	2008
European Journal of Communication	101	3	2004

In Table 4, it can be seen that the most cited authors are Chong and Druckman (2007) with the article "Framing Theory". This article refers to how the presentation and approach of information can influence the perception and understanding of a topic. It is a broad and general concept that applies to communication in various fields, such as politics, the media and society in general.

Apart from these five most cited articles, Table 5 appears with four additional articles, which are relevant as they are written by Hallin and Mancini themselves. However, there are none in which they collaborate. In this section of work from varied areas and disciplines, the analysis falls on what happened during the first ten years from when the original study, 2004, was published. It is noteworthy that the areas of application extend to a complex environment, i.e., two of them show their framing theory in connection to specific issues related to media coverage of immigration and swine flu. The remaining three articles are highlighted insofar as they revise and expand the original model, supporting the hypothesis that there is no single type of media system in Central and Eastern Europe, given the differences in press freedom, which eventually becomes a determining factor.

Table 4. Most cited articles.

Ranking	Journal	Title	Author	Year	Citations
1	*Annual Review of Political Science*	Framing Theory	Dennis Chong and James N. Druckman	2007	1,773
2	*Journal of Management Information Systems*	Emotions and Information Diffusion in Social Media-Sentiment of Microblogs and Sharing Behavior	Linh Dang-Xuan and Stefan Stieglitz	2013	800
3	*Communication Theory*	Political communication in media society: Does democracy still enjoy an epistemic dimension? The impact of normative theory on empirical research	Juergen Habermas	2006	773
4	*Journal of Communication*	A New Era of Minimal Effects? The Changing Foundations of Political Communication	W. Lance Bennett and Shanto Iyengar	2008	769
5	*Political Communication*	The Internet, public spheres, and political communication: Dispersion and deliberation	Peter Dahlgren	2005	761

Table 5. Most cited articles directly linked to the study.

Position	Journal	Title	Author	Year	Citations
31	*Journal of Communication*	Hallin and Mancini Revisited: Four Empirical Types of Western Media Systems	Michael Brüggemann, Sven Engesser, Florin Büchel, Edda Humprecht, and Laia Castro	2014	249
175	*Political Communication*	Ten Years After Comparing Media Systems: What Have We Learned?	Daniel C. Hallin and Paolo Mancini	2017	92
557	*International Journal of Communication*	Rethinking Hallin and Mancini Beyond the West: An Analysis of Media Systems in Central and Eastern Europe	Michael Brüggemann, Sven Engesser, Edda Humprecht, Laia Castro, and Florin Büchel	2017	37
640	*International Journal of Press/Politics*	From Liberal to Polarized Liberal? Contemporary U.S. News in Hallin and Mancini's Typology of News Systems	Efrat Nechushtai	2018	33
1,529	*International Journal of Communication*	Comparative Research, System Change, and the Complexity of Media Systems	Daniel C. Hallin	2020	11
1,616	*American Behavioral Scientist*	The Dynamics of Immigration Coverage in Comparative Perspective	Daniel C. Hallin	2015	10
1,645	*Journalism Studies*	The Partisans, the Technocrats and the Watchdogs: Domestication in Media Coverage of the Swine Flu Pandemic in 2009	Paolo Mancini, Alessio Cornia, Marina Ghersetti, and Tomas Odén	2016	10

4.2. Analysis of Scientific Maps

Once the performance of the scientific production has been analyzed, an analysis of the related thematic studies is carried out through the co-occurrence of keywords.

4.2.1. Period 2004–2010

The strategic diagram for the first period (Figure 2) shows the driving themes, those with high centrality and density, which correspond to "Citizens–Society" and "US Issues." The third cluster is "Data–Technology," an emerging (or disappearing) field of study, which shows little development and relationship with the rest. It is presented in the third quadrant with low centrality and density.

Our bibliometric study has revealed patterns and trends in communication systems consistent with the theories described by Hallin and Mancini in their 2004 landmark work for the period from 2004 to 2010. The main driving cluster (according to the number of articles published), "Citizens–Society," is directly related to its concept of a "policy-mediated communication model," which highlights the influence of the media on public perception and its relationship with civil society. The media aligns with its notion of the "Media System" and its importance in the coverage and representation of political issues. Communication strategies in electoral campaigns reflect their focus on "Political Communication" and how it affects democratic participation. In addition, academic research relates to this emphasis on the academic approach to communication systems. The psychological aspects of communication are related to the understanding of media effects and the psychology of information, which Hallin and Mancini also considered in their work. The digitization of information—"News (Internet)"—fits with his consideration of the "age of digitalization" and its impact on media and politics. In this context, the interaction between communication systems and the political realm aligns with Hallin and Mancini's analysis of the relations between media and politics in different communication systems.

In addition to the "Citizens–Society" cluster, there is a less relevant driving topic in terms of the number of publications called "US Issues," focused on specific issues related to the US during that time and which is directly related to the provided concept of "specific issues," which highlights media attention focused on specific issues. This cluster is surrounded by several secondary clusters that add depth and context to our understanding of political and media communication in that period. "Policy" addresses media coverage of public policies and government decisions relating to Hallin and Mancini's "sphere of politics." The dimension "Political Parties" focuses on political groups and their influence on political communication, aligning with the concept of "political actors." "Management" is another dimension that links government management and administration with the dimension of "structures of the political system." The "Ethnic–Gender" dimension considers issues of ethnic and gender diversity in the political context, relating to the notion of "civil society" and the representation of diverse groups in the media. Finally, "Conflict" focuses on political conflicts and tensions, in line with Hallin and Mancini's aspect of "political events," which analyzes how the media covers significant political events.

Strategic diagram period 2004–2010

Cluster map "Citizens-Society" 2004–2010

Cluster map "US Issues" 2004–2010
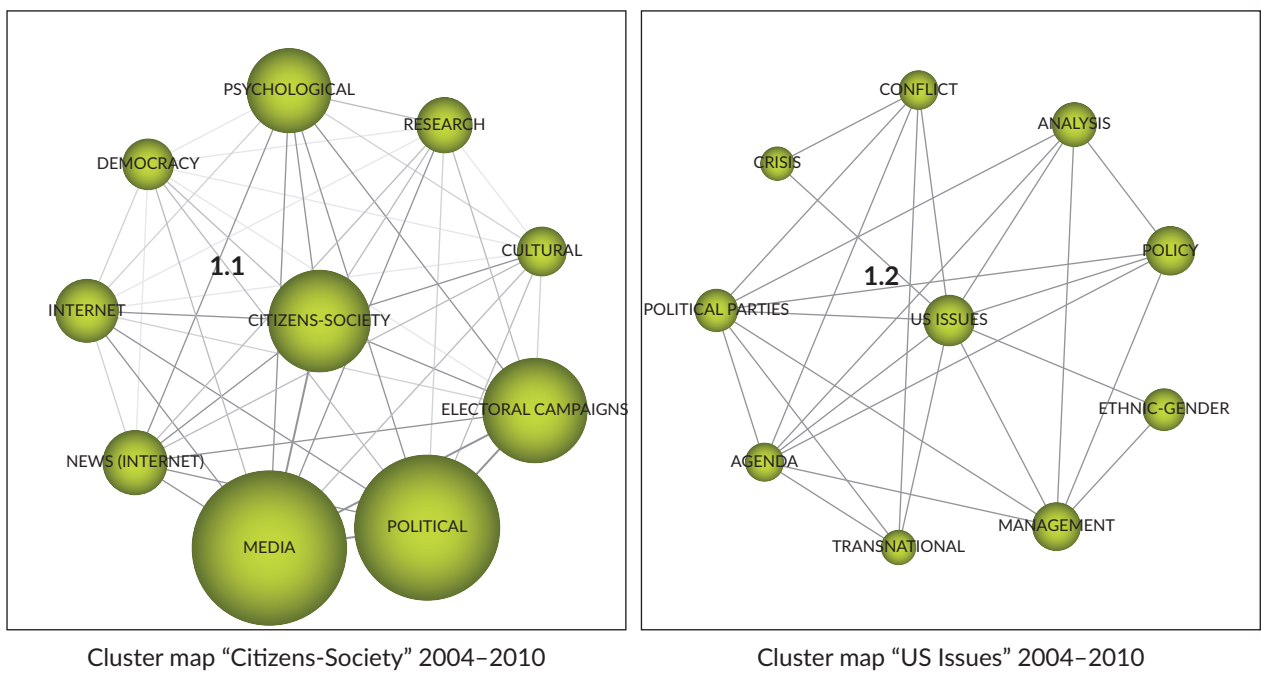
Figure 2. Strategic diagram for the period 2004–2010.

4.2.2. Period 2011–2019

For the second period, 2011–2019, three clusters are obtained, representing the following themes: "Political," "Policy," and "Ethnic–Gender." As can be seen in the strategic diagram of the second period (Figure 3), "Political" and "Policy" are driving themes. "Ethnic–Gender," the third cluster, is presented in the third quadrant with low centrality and density; therefore, it shows that this band is an emerging/disappearing field of study with little development and relationship to the rest.

Figure 3 shows that the "Political" driving cluster becomes the main node, displacing "Citizens–Society," the main node in the previous period, as a directly related secondary aspect. This seems to make sense, given that the 2008 crisis led to the development of exceptional economic measures and, consequently, increased political action to impose palliative measures. It is widely accepted that political action at times makes it difficult for the population to assimilate changing directions and intervention, which, in turn, creates additional input in efforts relative to "Media" communication from government agencies. Figure 3 identifies the second driving cluster, "Policy" (which shows lower density and centrality values than the previous one), including legal and regulatory aspects, strategy, governance, legitimacy, etc.

In the 2011 to 2019 timeframe, our bibliometric analysis has deepened the exploration of various countries' communication systems, considering the period's social, economic, and political circumstances. The main cluster identified, "Political," stands as the epicenter of political communication. This approach aligns perfectly with Hallin and Mancini's theory of the "politically mediated model of communication," where the media plays a critical role in the relationship between politics and society. Around the main cluster, "Political," we identified other clusters, such as "Media," "Electoral Campaigns," "Citizens–Society," and "Psychological," which relate directly to Hallin and Mancini's key concepts. "Media" is a relevant tag due to the obvious importance of the media in political communication, as Hallin and Mancini emphasize in their media systems outlook. "Electoral Campaigns" ties into the notion of "political events," examining how communication strategies influence political campaigns. "Citizens–Society" reflects the relationship between citizens and society in the context of communication systems, which is central to Hallin and Mancini's understanding of civil society and in shaping public opinion. Finally, "Psychological" relates to the idea of the psychological effects of media communication, a key dimension in Hallin and Mancini's analysis of how media influences public perception.

In addition to the previous cluster, there is also another less relevant driving topic called "Policy," which focuses on the formulation and implementation of public policies and how communication systems influence this process. This approach connects directly to the "public policy" dimension analyzed by Hallin and Mancini, which examines media coverage of political issues and the influence of media on political agendas. Around the main cluster, "Policy," we identified other secondary clusters that play a significant role in this context: "Democracy," which focuses on democracy as a political concept and social process. In line with the theories of Hallin and Mancini, it examines how political and media communication impact the public perception of democracy and its functioning. "US Issues" reflects specific attention to US-related issues, connecting with Hallin and Mancini's "specific issues" approach. It analyzes how political and media communication influences the perception of issues related to the US in a global context. "Management" concentrates on government management and administration, connecting with Hallin and Mancini's dimension of "structures of the political system" and examining how the media reports on the management of government institutions. "Cultural" explores the cultural dimension of political communication, highlighting how cultural elements influence public perception and politics in general. Finally, "Governance" focuses on power and governance structures, connecting with Hallin and Mancini's analysis of how the media covers political institutions and their functioning.

Strategic diagram period 2011–2019
Source: authors from software SciMAT

Cluster map "Political" 2011–2019
Source: authors from software SciMAT

Cluster map "Policy" 2011–2019
Source: authors from software SciMAT

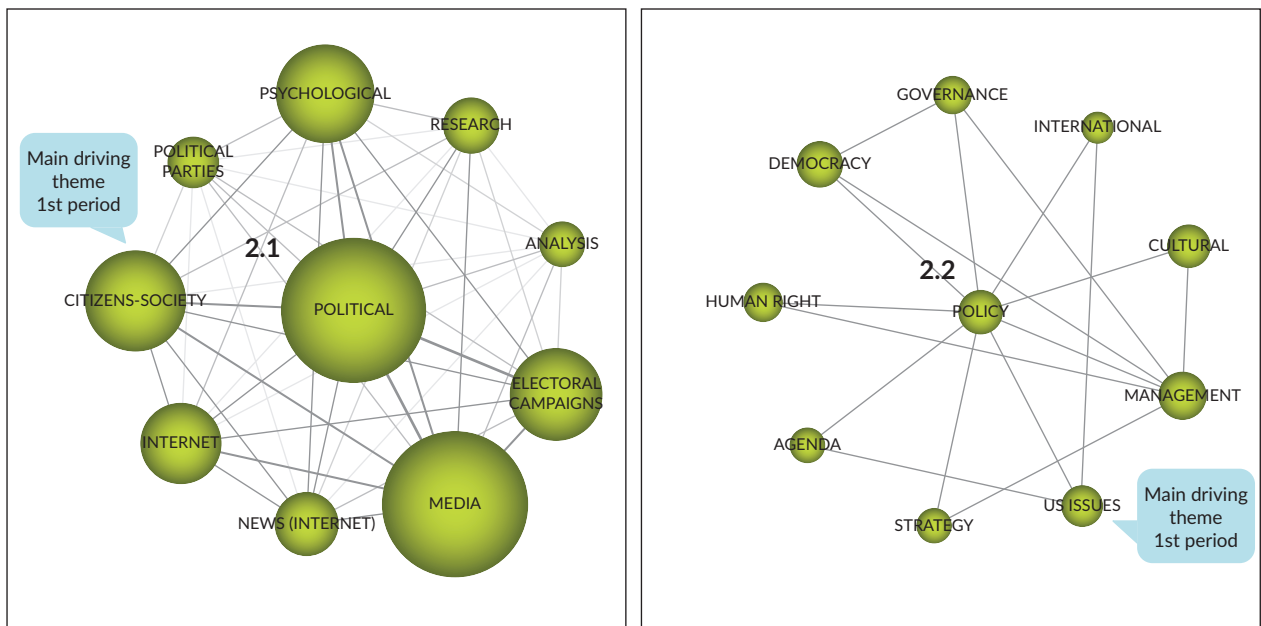**Figure 3.** Strategic diagram for the period 2011–2019.

4.2.3. Period 2020–2023

In this third and last period, three clusters are obtained, which are observed in the strategic diagram (Figure 4), which represent the following themes: "Media" and "Policy" as driving themes and "Ethnic–Gender" as an emerging theme; this does not evolve with respect to the previous period.

Figure 4 shows how the "Media" driving cluster occupies the central position, which in the first period was occupied by "Citizens–Society" and in the second, "Political." In any case, the relationship between these three areas of research is close and is consolidated throughout the study. This predominant communicative action during the pandemic has been experienced worldwide, which may make sense. Figure 4 shows the map of the second "Policy" cluster, which renews its position from the previous period.

Strategic diagram period 2020–2022
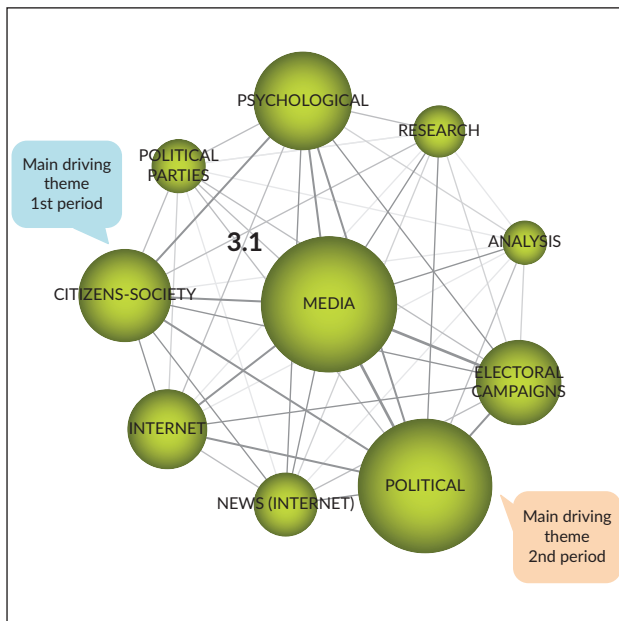
Cluster map "Media" 2020–2022
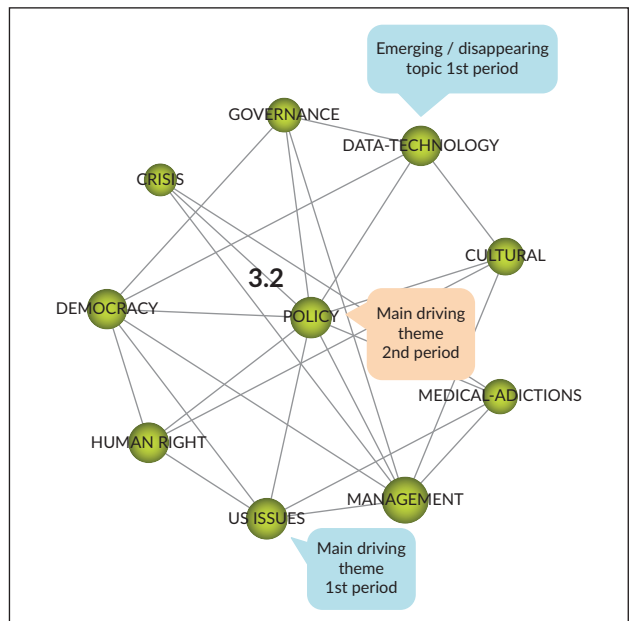
Cluster map "Policy" 2020–2022

Figure 4. Strategic diagram for the period 2020–2022.

During the most recent period analyzed (2020–2022), the bibliometric analysis brings the focus to understanding patterns, trends, and variations in communication systems within a context marked by

exceptional social, economic, and political circumstances after the emergence of Covid-19 as a central factor. In this context, the main cluster "Media" stands out as a crucial element, in line with Hallin and Mancini's theory of "policy-mediated communication." Media continues to play a critical role in contemporary society, especially during the Covid-19 pandemic, where information and disinformation have a significant impact on public perception and policy decisions. This reinforces the importance of media coverage in shaping public opinion, a concept central to Hallin and Mancini's work. Likewise, secondary clusters such as "Political," "Psychological," "Citizens–Society," and "Electoral Campaigns" are connected to the dimensions analyzed by Hallin and Mancini. While the "Political" tag includes political communication adapting to times of health crisis (aligning with Hallin and Mancini's "political events"), the "Psychological" area extends to the emotional and psychological aspects of political communication, linking to the effects of media on public perception. Finally, two main anchors for Hallin & Mancini's theory of civil society and public opinion encompass "Citizens–Society" and "Electoral campaigns." These highlight "citizen participation" and "social mobilization"; in particular, "Electoral Campaigns" explores how political communication strategies influence election outcomes, side by side with the analysis of media systems and their impact on politics.

Around the "Policy" cluster, which, although it is a driving issue, has a lower relevance than "Media," other secondary clusters have been identified as playing a significant role:

- "Management" focuses on government management and administration, and is related to the dimension of "structures of the political system" analyzed by Hallin and Mancini. It examines how the media reports on the management of government institutions and how this management influences public perception.
- "US Issues" reflects specific attention to US–related issues, connecting with Hallin and Mancini's "specific issues" approach. It explores how political and media communication influences the perception of issues related to the US in a global context.
- "Governance" focuses on governance and governance structures, which connects with Hallin and Mancini's analysis of how the media covers political institutions and their functioning.
- "Data–Technology" addresses the influence of technology and data on political communication and government decision-making, an increasingly relevant topic in the digital age.
- "Democracy" explores the perception and functioning of democracy in this period, in line with Hallin and Mancini's approach to communication and democracy.

Figure 5 visualizes the longitudinal analysis of the three periods, considering the evolution of the main driving themes of each of them, their relationship with the relevant political and social circumstances, and their link with the work of Hallin and Mancini. During the first period (2004–2010), marked by the driving theme of "Citizens–Society," communication systems focused on civil society and citizen participation. This happened at a time when information technologies and social media were beginning to impact political communication significantly. Civil society had become a driving force in public opinion, and the media, as prominent stakeholders, addressed issues related to society's participation in political decision-making. Hallin and Mancini highlight the importance of civil society in their work, and this period reflects an increase in the visibility and influence of citizens in the public sphere.

In the second period (2011–2019), the main driving theme focus was the "Political" area, which coincided with a focus on political communication and the perception of democracy. Media coverage of political issues, the communication strategies of political leaders, and the relationship between media and politics are

central themes. This period was marked by significant political changes in many nations, including elections and social movements. Hallin and Mancini address political communication at the core of an increased attention to politics for its centrality in public relations.

In the third period (2020–2022), the main driving theme returns to "Media," suggesting that, despite the evolution of topics and changing circumstances, the media remains a central factor in the formation of public opinion and quality democratic tools. The context of the Covid-19 pandemic brought awareness of the critical role played by timely and effective sharing of information; media is perceived as playing a critical role in disseminating reliable information and influencing the perception of government management to fight disinformation. This highlights the importance of media in the public eye, as demonstrated by Hallin and Mancini's basic framework.

In summary, throughout these three periods, we have seen an evolution in the issues and circumstances that have shaped political communication, but also a continuity in the relevance of media and citizen participation. These findings are anchored in Hallin and Mancini's theories on political communication and its influence on public opinion and democratic quality, highlighting the importance of adapting to ongoing political and technological changes.
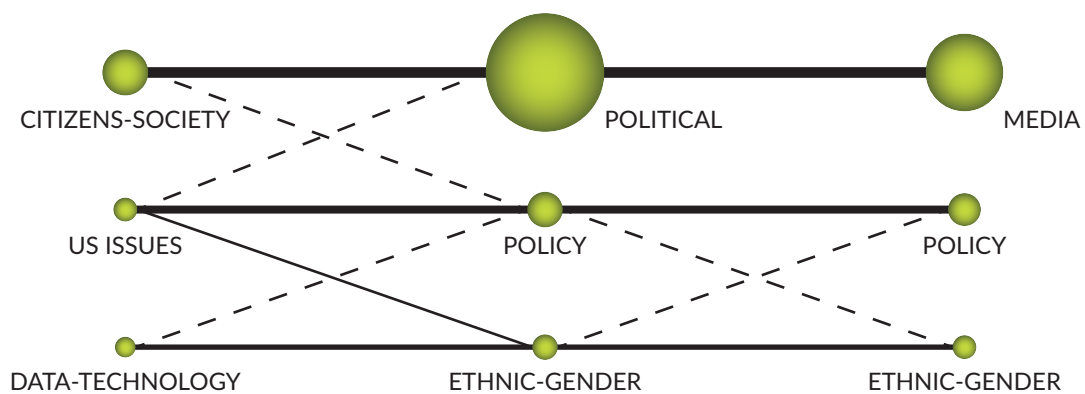
Figure 5. Longitudinal analysis themes and time periods.

5. Conclusions and Implications

Hallin and Mancini's research focuses on the analysis of media systems and their relationship to politics and society. This work has provided valuable insights into how media systems influence political communication, public opinion, and democratic processes. The model has been widely used to analyze and compare media systems in different countries, contributing to the study of the interaction between media, politics, and society. In this context, the purpose of this research was to answer the questions posed in Section 2. Regarding RQ1, it is confirmed that Hallin and Mancini's theories constitute a starting point that must be adapted to the current circumstances marked by social and media globalization and technological development across borders. Regarding RQ2, two general areas have been identified regarding the evolution of topics and highlighting areas of knowledge. In the first place, "Media" consolidates its primacy, although always related to aspects within the theme of "citizenship" and, more specifically, "Politics." Less relevant in terms of the importance of scientific production but still being a common theme, we highlight "Politics," which is focused on aspects of governance. Regarding RQ3, it is seen that the topic "Ethnic–Gender,"

although it has been less studied, is an emerging issue that has evolved over time. Finally, the main strength lies in the fact that the comparative analysis of media has advanced significantly in this last decade, from 2009, especially with regard to the development of qualitative indicators of key concepts. However, there are missing threads that represent a niche for action and policy implementation. This calls for a desirable progressive methodological pluralist approach and a more in-depth reflection on the nature and development of systems and the ways in which the results converge in different quantitative studies for gathering insight.

In summary, the work of Siebert et al. (1956) lays the foundation for understanding how the media conceptualizes its key tools for communications as part of different political systems. Although published earlier, Bernays's work (1928) still provides a fundamental understanding of the influence of the media and the manipulation of public opinion. This earlier focus on propaganda and persuasion techniques may be relevant to understanding how media is used to influence public opinion in the contexts described by Siebert et al. (1956). The work of Hallin and Mancini (2004) enriches previous theories by carrying out an exhaustive comparison of media systems in the Western world. In doing so, it expands on the perspective established by Siebert et al. (1956), as it includes illustrative case studies that exhibit how media systems operate in various cultural and political settings. This enriches the understanding of press theories in a global context and helps to apply these theoretical frameworks to real-world situations.

5.1. Limitations

Among the limitations that remain open to further inquisition, five areas of inquiry identify an open and vital ground.

First, from the perspective of qualitative analysis, the bibliometric approach tends to focus on quantitative data and may not capture the richness of Hallin and Mancini's qualitative contributions to theory and practice, which we exposed in Section 2. Next, a second consideration is related to language and geographical coverage. The choice of database and the languages are part of a search that follows an established path; this affects the scope of tangible and intangible variations and nuances in the results. Some of Hallin and Mancini's works may be written in less common languages or published in sources not indexed in certain databases.

Third, the emphasis on indexed publications presents a limitation to the focus on publications indexed in academic databases since this predominant ratio may exclude other types of work, such as technical reports, books, book chapters, and conference contributions, which may also be important in scholarly output. Following that, a fourth limitation arises from the interpretation of quotes because they do not always indicate positive support or agreement, which may put forward a context of critical criticism or deep discussions, a rich interpretation that simple quotations do not necessarily reflect. The fifth and final phase focuses on biases in the selection of sources, since depending on the database and the keywords used in the bibliometric search, there could be a bias in the selection of the sources included in the study.

5.2. Possible Future Lines of Research

Since 2011, Hallin and Mancini's new approach has been valuable in establishing a theoretical basis and structure for comparing media systems in different countries. However, it is important to recognize its

limitations, among which the globalization of the media and the inclusion of digital media should be highlighted. In this context, we propose two future lines of research. The first of these focuses on the growing influence of globalization on the media industry, understood as the process of interconnection and interdependence of cultures, the economy, and communication worldwide. The second focuses on the need to consider the influence of digital media, as they contribute to disinformation due to the lack of access to reliable sources of information, a negative element in terms of mediating public opinion and electoral processes with repercussions on a functioning society within a healthy democracy.

Conflict of Interests

The authors declare no conflict of interests.

References

Bennett, L. (2013). Civic learning in changing democracies: Challenges for citizenship and civic education. In P. Dahlgren (Ed.), *Young citizens and new media* (pp. 59–77). Routledge.

Bernays, E. (1928). *Propaganda*. Horace Liveright.

Chong, D., & Druckman, J. N. (2007). Framing theory. *Annual Review of Political Science*, *10*, 103–126.

Cobo, M. J. (2012). *SciMAT: Herramienta software para el análisis de la evolución del conocimiento científico. Propuesta de una metodología de evaluación*. Universidad de Granada.

Cobo, M. J., Chiclana, F., Collop, A., de Ona, J., & Herrera-Viedma, E. (2014). A bibliometric analysis of the intelligent transportation systems research based on science mapping. *Transactions on Intelligent Transportation Systems*, *15*(2), 901–908. https://doi.org/10.1109/TITS.2013.2284756

Cobo, M. J., López-Herrera, A., Herrera-Viedma, E., & Herrera, F. (2011). An approach for detecting, quantifying, and visualizing the evolution of a research field: A practical application to the fuzzy sets theory field. *Journal of Infometrics*, *5*(1), 146–166. https://doi.org/10.1016/j.joi.2010.10.002

Cumming, D., & Johan, S. (2017). The problems with and promise of entrepreneurial finance. *Strategic Entrepreneurship Journal*, *11*(3), 357–370. https://doi.org/10.1002/sej.1265

Ellegaard, O., & Wallin, J. A. (2015). The bibliometric analysis of scholarly production: How great is the impact? *Scientometrics*, *105*, 1809–1831. https://doi.org/10.1007/s11192-015-1645-z

Esser, F., de Vreese, C. H., Strömbäck, J., Van Aelst, P., Aalberg, T., Stanyer, J., & Reinemann, C. (2012). Political information opportunities in Europe: A longitudinal and comparative study of thirteen television systems. *The International Journal of Press/Politics*, *17*(3), 247–274. https://doi.org/10.1177/1940161212442956

Gurău, C., & Dana, L. P. (2020). Financing paths, firms' governance and corporate entrepreneurship: Accessing and applying operant and operand resources in biotechnology firms. *Technological Forecasting and Social Change*, *153*, Article 119935. https://doi.org/10.1016/j.techfore.2020.119935

Hallin, D. C., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (Eds.). (2011). *Comparing media systems beyond the Western world*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (2013). Comparing media systems: A response to critics. In F. Esser & T. Hanitzsch (Eds.), *Handbook of comparative communication research* (pp. 207–220). Routledge.

Hallin, D. C., & Mancini, P. (2017). Ten years after comparing media systems: What have we learned? *Political Communication*, *34*(2), 155–171.

Hörisch, J., & Tenner, I. (2020). How environmental and social orientations influence the funding success of investment-based crowdfunding: The mediating role of the number of funders and the average

funding amount. *Technological Forecasting and Social Change*, *161*, Article 120311. https://doi.org/10.1016/j.techfore.2020.120311

Lasswell, H. D. (1927). *Propaganda technique in the world war*. Kegan Paul.

Lippmann, W. (1923). Public opinion [Review of the book *Public opinion*, by W. Lippmann]. *The Journal of Nervous and Mental Disease*, *57*(1), 100.

Paule-Vianez, J., Gómez-Martínez, R., & Prado-Román, C. (2020). A bibliometric analysis of behavioural finance with mapping analysis tools. *European Research on Management and Business Economics*, *26*(2), 71–77. https://doi.org/10.1016/j.iedeen.2020.01.001

Ramezani, H., Alipour, M., & Momeni, E. (2014). Scientific maps: Methods and techniques. *Journal of the Popularization of Science*, *5*(6), 53–84.

Siebert, F., Peterson, T., & Schramm, W. (1956). *Four theories of the press: The authoritarian, libertarian, social responsibility, and Soviet communist concepts of what the press should be and do* (Vol. 10). University of Illinois Press.

About the Authors

Daniel Corral de la Mata (PhD) is a doctor in economics and business sciences with experience backed by more than 30 years of activity in the financial sector, performing commercial management functions both at the network and central services level. Experience in positions of responsibility in various departments such as marketing, remote channels, payment methods, management control and business development, internet and online banking, and asset management. He has been a university professor since January 2020.

José Ramón Sarmiento Guede (PhD) earned a doctorate degree in marketing from the Rey Juan Carlos University, an MA in marketing management from ESIC Business & Marketing School, an MA in commercial management from the Rey Juan Carlos University, and an MA in tourism business management from ESERP Business School. He is accredited as doctor assistant professor, private university professor, and a contract professor doctor by ANECA since June 2018. He specializes in marketing relationships, interactive marketing, digital marketing strategies, digital communication, and social media marketing.

María García de Blanes Sebastián (PhD) earned a doctorate degree from Rey Juan Carlos University (2023) in economics (*Development of Predictive Models to Understand Consumer Behavior Regarding Technology*), an MA in digital marketing from the UOC (2019), has a IESE Management Development Program in 2012, holds an MA in marketing and commercial management from ESIC (2007), and has graduated from the Complutense University (1999). Marías has various publications in magazines, books, and manuals, and has more than 20 of professional experience in the areas of marketing, sales, operations, and business intelligence in different sectors and companies (Orange, Zed Worldwide, Telvent, among others).

cogitatio

ARTICLE

Redefining Hallin and Mancini's Media System: Cross-Border Investigative Networks in Europe

Lorena R. Romero-Domínguez [ID]

School of Communication, University of Seville, Spain

Correspondence: Lorena R. Romero-Domínguez (lorenaromero@us.es)

Abstract

This article analyses how cross-border investigative journalism (CBIJ) has expanded the parameters of the media system described by Hallin and Mancini (2004), with the addition of new indicators to adapt it to the paradigm of global convergent media. To this end, it examines how this type of journalism has been conceptualised in Europe as a result of the forums articulated at Dataharvest (the European Investigative Journalism Conference). A quantitative method is applied with text mining techniques to analyse the frequency, associations, and groupings of terms mentioned in the sessions offered from 2014 to 2023. To classify the language units, the variables of CBIJ's economic model, its thematic relationship with national contexts, and its professional practices are used. The results reveal a clear predominance of the word "data," reflecting Dataharvest's particular interest in the dynamics of data processing, which has become an essential part of the work in these networks. An analysis of organisational culture reveals that high-profile associations play a more important role in collaborative projects than less institutionalised networks. The business model encourages non-profit organisations that depend on foundations to support their work. In thematic terms, CBIJ projects address topics emerging in the supranational space, offered with a common frame of reference for multiple countries. These networks necessitate a redefinition of the model defined in 2004, as they have developed qualities of their own in relation to the business model they adopt, the transnational orientation of reporters, the issues addressed, and, to a lesser extent, professional practices.

Keywords

cross-border investigative journalism; data; Europe; funded journalism; intertwined newsrooms; media systems; non-profit organisations; transnational network

---

1. Introduction

Hallin and Mancini's book *Comparing Media Systems: Three Models of Media and Politics* has, since its publication, been recognised as one of the most significant contributions to communication studies (Hallin & Mancini, 2004). The conceptual framework designed by Hallin and Mancini facilitated the identification of similarities and differences between media organisations, journalism cultures, and professional practices, giving rise to numerous taxonomic studies in this field.

Hallin and Mancini (2012, 2017) revisited their previous work in 2012 and 2017, incorporating updates to adapt it to the global digital context (Humprecht et al., 2022; Liu et al., 2020). The appearance of terms such as "hybridisation" (Hallin et al., 2023) and "volatility" (Mancini, 2015), ensured the continued validity of the model defined in 2004 in a convergent environment open to the innovations introduced by digitalisation (Flew & Waisbord, 2015).

These references to the global digital paradigm inform the framework that underpins this study. The fluidity of communication exchanges resulting from a phenomenon of internationalisation—associated with networks that connect journalists across national borders—requires us to broaden the scope of Hallin and Mancini's model.

Hallin (2020) himself has recognised the impact of transnationalisation and how this phenomenon, accelerated by the internet, has reinforced the idea that media systems are not closed or autonomous models, opening up the possibility of expanding and refining the original categories defined in 2004. This idea has also been supported by Kraidy (2011), who, in his research on the pan-Arabic media space, analyses how media corporations operating across borders incorporate conceptual innovations. As examples, he points to transnational parallelism and a broader conception of the roles played by professionals.

One characteristic example of these transnational media initiatives can be found in the networks of journalists who operate between countries and collaborate on the investigation of major global news stories. These networks have grown exponentially in the last few decades (Krüger et al., 2019), and yet they have received barely any scholarly attention in proposed revisions to the work of Hallin and Mancini. It seems clear that the "ideal models" (Hallin & Mancini, 2017, p. 159) defined in 2004 could be enriched by empirical studies like this one, given that cross-border investigative journalism (CBIJ) escapes state-centric rhetoric (Couldry & Hepp, 2009), moving in an "in-between space" (Hellmueller & Berglez, 2022, p. 15) where traditions, practices, and narratives of different models are all combined.

Given the above considerations, this article analyses the development of the idea of CBIJ in Europe and its contribution to an adaptation of the classical model of media systems to a transnational phenomenon, incorporating new values related to aspects such as the financial models that support these initiatives, their connections to political structures, the topics explored, and professional practices. In this way, the spectrum of the original dimensions of the press market, political parallelism, and journalistic professionalism can be broadened in consonance with other studies that have updated the scope of Hallin and Mancini's model over the last two decades. This study thus seeks to test the following hypotheses:

H1: CBIJ prioritises non-profit organisations supported by foundations and reduces the importance of monetizable elements as it aims for an impact distinct from the financial gain expected in the commercial business model.

H2: CBIJ transforms political parallelism into transnational parallelism to facilitate Europe's visibility as a priority topic and to cultivate a supranational consensus on basic human rights in the EU.

H3: CBIJ encourages a higher level of internal and external autonomy for journalists in these networks to foster professional practices that can overcome the limitations of the competitive models of conventional media.

To test these hypotheses, this study examines the role of Dataharvest (the European Investigative Journalism Conference) in shaping CBIJ.

Dataharvest has become a key player in collaborative cross-border journalism. This organisation has been consolidated as a European extension of highly institutionalised investigative networks in the US, such as Investigative Reporters and Editors, the Global Investigative Journalism Network, and the International Consortium of Investigative Journalists, organisations that have been responsible for shaping the narrative on investigative journalism since the 1970s.

Candea (2020) and Houston (2016) highlight the importance of these events in formalising and promoting a particular way of understanding and doing journalism. Their organisers choose the session participants, the topics to be addressed, and the potential areas of discussion and influence. Lampel and Meyer (2008) also explore the significant value of analysing events like these to identify their influence on the evolution of certain professional fields. From the perspective of organisational sociology, Haug (2013, pp. 712–713) points out how these spaces establish a principle of order through the relationship of trust they create between participants and organisers. The scale of this consensus supports the idea of a conceptualisation process operating at these events, where opinions are seen through the lens of the cooperative and a group notion is constructed on certain issues. The creation of these interpretative communities gives those who belong to them a consciousness and identity as members of a specific professional field (Lampel & Meyer, 2008, p. 1027).

Adopting the term used by Schüßler et al. (2015, p. 169), the annual Dataharvest conference could be described as a "mega-event," with a high degree of legitimacy for influencing the narrative on CBIJ. The number of participants has increased exponentially over the years, from 35 in 2011 to more than 500 in its most recent edition. It also has an independent organisation (the Arena for Journalism in Europe) responsible for its organisation, and it is now considered a "global hub" for sharing resources, discussing experiences, and receiving mentoring (Heft, 2021, p. 460; Heft et al., 2019, p. 1187).

Recognising this function, this study aims to identify the topics addressed at Dataharvest since 2014 and to determine the frequency and evolution of those topics over the years. This frequency and relationship analysis will establish a hierarchy of content to identify the topics that have dominated the conferences in discussions of the categories of funding, professional practices, thematic diversity, actors, and connections of these transnational networks. These categories are based on the conceptual framework described in Section 2.

The approach taken in this research connects it with the discursive processes of meta-journalism described by Carlson (2016), who highlights the importance of public expressions like the annual Dataharvest conferences for shaping an understanding of journalism as a cultural practice that is interrelated with the contextual (social, economic, technological) conditions of the time.

It is not the aim of this article to explore the extent to which these ideas have permeated the professional consciousness of conference attendees. However, the literature consulted does provide qualitative data on this, which will be compared against the findings of this study in Section 5.

2. A Conceptual Toolkit to Understand CBIJ

Collaborative investigative journalism has grown exponentially over the last two decades. As a result, scholarly research on this phenomenon has also increased. Some authors have taken an approach to CBIJ that focuses on the analysis of professional practices (Alfter, 2016; Alfter & Candea, 2019; Heft, 2021; Heft & Baack, 2022; Konow-Lund, 2019; Wuergler & Cancela, 2022), while others have highlighted its capacity to offer a solution to the current crisis in journalism by fostering synergies between media organisations facing financial difficulties (Michailidou & Trenz, 2023). The technological dimension has also been an important focal point (Bird & Candea, 2017; Bunce et al., 2018; Ng, 2021), with detailed descriptions of the digital technology that has accelerated this practice in contemporary society.

Integrating all these approaches, the theoretical framework for this study describes the categories of funding models, professional practices adopted in newsrooms, topics explored in reporting projects, and participants in these networks and their connections. As a starting point, this research adopts the description of CBIJ offered by Graves and Konieczna (2015), who define it as a form of "field repair" that adapts media practices to the complexities of the real world. Responding to journalists' dissatisfaction with their companies' limited resources (Heft, 2021, p. 462), CBIJ has become a "space" where professionals can break free from the limitations imposed by editorial lines and commercial interests. It thus enables them to take on a more ambitious, wide-ranging mission, reflected in the potential of teams working on global stories that are silenced in mainstream media (Alfter, 2021, pp. 219–220). In this way, CBIJ can be associated with the recovery of quality journalism (Coronel, as cited in Houston, 2021, p. 1094), reclaiming basic values such as accountability, transparency, and the exposure of abuses of power. Indeed, various EU institutions have confirmed this association, specifically highlighting the positive effects that cross-border cooperation between investigative journalists has on the quality of the information provided to the public (European Commission, 2018, p. 30; European Parliament, 2018, pp. 9, 12).

2.1. Sustainable and Impactful Alternatives for CBIJ

The expansion of transnational journalist networks is intrinsically associated with the consolidation of non-profit organisations (Kaplan, 2013). The decline of the commercial model has given impetus to the search for financial alternatives in a saturated market that cannot guarantee enough resources for everyone (Clement et al., 2018; EUROPE Ltd & Media Consulting Group, 2014; Maness, 2013). Various formulas have been adopted, but the most prominent in quantitative terms has been funding from private and public foundations, representing 27 billion dollars since 2009 according to data from Media Impact Funder (https://mediaimpactfunders.org).

It is also important to assess the success and impact of CBIJ. In the profit-driven model, the organisation supports stories that readers display a willingness to pay for. In non-profit organisations, the impact is measured using different indicators, such as the visibility of salient topics and their capacity to generate conversation in other media, the creation of exclusive editorial value (Alfter, 2019, p. 5), and reputation, as reflected in awards and prizes. It is thus not a question of profits but of deliberative and substantive civic impact, with a decisive influence on the redefinition of public opinion and changes to political agendas (Hamilton, 2016, p. 93).

2.2. Norms and Practices in Intertwined Newsrooms

CBIJ adopts a formula of "intertwined newsrooms" (Buschow & Suhr, 2022, p. 295) with diverse journalism cultures integrated into hybrid networks. In such networks, resources are not distinguishable as belonging to a specific organisation, and innovative practices are developed that push the boundaries of conventional journalism (Mesquita & de-Lima-Santos, 2021, p. 548). These practices include the creation of international solidarity and shared ethical standards that prioritise trust and mutual assistance over competition (Hume & Abbot, 2017, p. 5). The synergies generated encourage professionals to take a shared interest in an issue and to coordinate materials, narratives, and publication dates.

Other notable benefits include the expansion of investigative capacities thanks to the "pooling of resources" (Konow-Lund, 2019, p. 103) and knowledge transfer between team members, as well as access to local experts and technical data skills. The success of these partnerships depends on a neutral editorial coordinator who can resolve the tensions that arise in projects of this scope (Sambrook et al., 2018, p. 29).

2.3. Systematised Thematic Diversity

The complexity of cross-border realities offers a wide range of possible topics reflecting considerable thematic diversity. However, the academic literature reveals a somewhat systematic dimension to these projects (Hamilton, 2016, p. 62), with political actors, corporations, and criminal organisations implicated in global stories of embezzlement and mismanagement.

In Europe, these networks address common issues on the supranational level (Grill & Boomgarden, 2017), with special attention to corruption and EU funding, but without ignoring other topics of special significance such as the environment, healthcare, the rise of the far right, or care for vulnerable groups.

2.4. Connections

Archetti (2019) proposes a relational approach to these networks with a fluid map of exchanges between actors. This not only includes news industry professionals (editors, journalists, photographers, fact-checkers, etc.) and the sources they work with but also covers other professionals such as data scientists, coders, activists, intermediary organisations, etc. The connections between them are established mainly through the shared technology platforms (Bird & Candea, 2017; Bunce et al., 2018) that have been responsible for accelerating the development of these kinds of practices in a connected society (Carson, 2020; Gearing, 2016).

It is also important to consider factors such as the size and duration of the network, the integration of organisational factors, the institutionalisation of roles and tasks, and discussion and decision-making processes (Houston, 2021; Jenkins & Graves, 2022). These give rise to somewhat hierarchical and centralised structures, with high- or low-degree collaborations (Heft et al., 2019, p. 1189). The workflows in these collaborations may be vertical, proposed by editors or coordinators, or the product of the pioneering practices of individual journalists seeking to introduce a differentiating factor into their work environments (Hepp & Loosen, 2021, p. 590).

3. Methodological Design

A quantitative methodology has been adopted for this study based on automated content analysis employing text-mining techniques. A total of 1,015 documents (87,589 words) containing the abstracts for the sessions held at the conferences from 2014 to 2023 were analysed. The texts were downloaded from the Dataharvest website (https://dataharvest.eu) and subjected to a first-level manual clean-up prior to indexing, information extraction, classification, and analysis.

First of all, a basic frequency analysis was conducted to obtain a count of the essential units of language and their evolution over the period studied. Various grammatically related terms and synonyms were considered, after eliminating stopwords. The bag-of-words frequency model was applied for untransformed counts and the term frequency–inverse document frequency measure was used with a logarithmic reduction to highlight words that were less common but still significant in the corpus.

Secondly, n-grams were used to detect adjacent terms and find meaningful associations. Bigrams and trigrams insert the words into their context for a better understanding of the relational codes identified in the Dataharvest sessions.

Finally, a cluster analysis was conducted using transformers applied to document vectors with sBERT. This natural language processing technique, developed using a pre-trained AI model, was adopted due to its capacity to perform semantic searches and understand the context of a word based on the words coming before or after it. The results obtained were grouped using k-means clustering, which shows relationships that are not apparent at first sight and identifies patterns that help categorise unstructured data into coherent groups with shared qualities.

Automated text analysis has been applied in two consecutive stages. The first was the extraction stage, where essential language units were isolated and quantified by applying the bag-of-words model and term frequency–inverse document frequency. The second was the classification stage, which involved the organisation of the terms into nominal categories based on the conceptualisation of CBIJ outlined in Section 2. The development of the analysis protocol began with an initial datasheet resulting from the theoretical review. After a preliminary superficial exploration of the corpus, some variables were recoded to fill in the gaps detected.

As reflected in Table 1, four main research categories were defined: funding model (RC1), professional practices and routines in collaborative newsrooms (RC2), topics explored in reporting projects (RC3), and participants in these networks and their connections (RC4). The indicators selected were identified as potentially useful for

clarifying how the original variables of the press market, political parallelism, and journalistic professionalism have expanded in the context of globalisation and convergence.

Two levels were specified within each category: the first with a macro variable, and the second with the keywords that would facilitate the semantic allocation of the language units obtained in the count to the level 1 variables. The complete list of keywords for the second level can be consulted in the Supplementary File.

Table 1. Research categories.

Category of analysis	Variables
Economic model	Financial sources; revenues; number of informative outputs; competitiveness; supply and demand; metrics; impact; reputation
Work practices	Organisational form; professional conditions; skills and working methods
Thematic diversity	Topics; reasons to cover a topic
Actors/connectors	Constellation of actors; digital resources; shared resources; infrastructures; networks (non-hierarchal/centralized)

After an initial automated allocation using an index of coincidence, the textual context of these units was reviewed manually in the original documents with the aim of disambiguating words that could be classified into multiple categories.
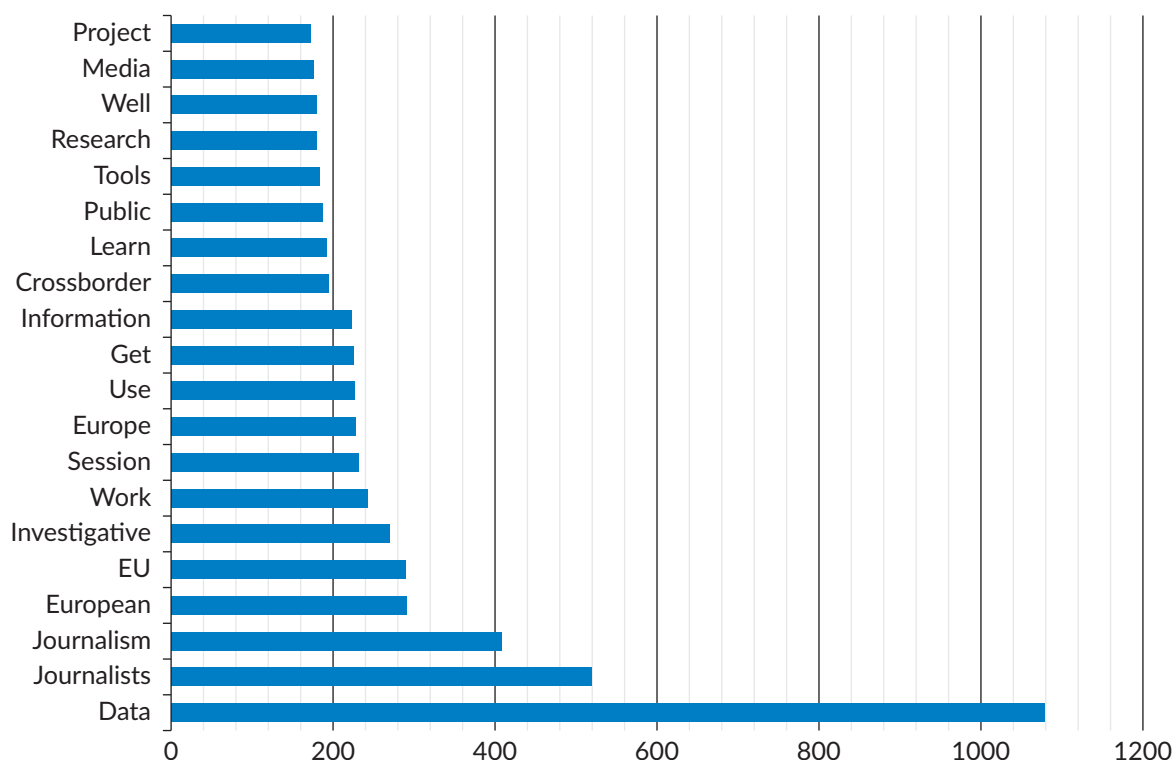
4. Results

4.1. Frequency Analysis

Figure 1 presents the 20 most frequently used terms. The word with the most appearances is "data" (1,079), well ahead of "journalists" (519), "journalism" (408), "European" (291), "EU" (289), "investigative" (271), "work" (242), and "Europe" (228). The combined repetitions of words related to the physical and symbolic supranational space ("European," "EU," and "Europe") place this concept in third place with 818 repetitions, behind the 927 combined repetitions of the generic "journalists" and "journalism." The rest of the content words in this first count refer to elements associated with professional practices (including "information" with 222 repetitions; "tools" with 184; "research" with 180; and "project" with 173), the transnational nature of the teams ("crossborder" with 195) and the type of space being covered by the news ("public" with 187).

The analysis was then expanded to include words used 20 times or more to increase the corpus and map a more complex semantic space related to CBIJ. A total of 492 items were obtained and grouped according to the descriptors defined in the methodology section. The table with the full classification is included in the Supplementary File.

The results reveal that the issues dealt with the most at Dataharvest conferences are those referring to professional practices (RC2), with 192 words (11,967 total repetitions). Next is the category of connections (RC4), with a lower number of more frequently repeated units (77 words and 4,827 repetitions), followed by the category of topics investigated (RC3; 91 words and 4,168 repetitions), and finally funding models (RC1; eight words and 251 repetitions).

Figure 1. List of the 20 most frequently repeated words in Dataharvest documents (2014–2023). Note: The full results are provided in the Supplementary File.

In RC1, words related to grants/donations from foundations predominate. This category also includes the specificity of the non-profit model, but other words reflecting the diversity of funding sources, such as crowdfunding (eight repetitions), prizes with a monetary component, and sponsorships (three repetitions), are left out of this list. References to the sustainability (five repetitions) and monetisation (three repetitions) of these projects and to entrepreneurship (14 repetitions) are also excluded.

In addition to skills associated with data processing and the use of specific software, the category of professional practices (RC2) includes terms related to information sharing, leaks, whistleblowing, and storytelling techniques. The study identified a wide range of words related to the day-to-day activities of journalists: "investigate," "explain," "find," "understand," "look for," "discuss," "report," "publish," etc. Freedom of information is also mentioned, and there are references to the risks and threats that professionals in these networks are exposed to, with special attention to online security. These issues, along with related legislation (which is also included in this ≥20 frequency list), form part of the macro-context in which reporters work.

In relation to the essential principles that define the profession, "transparency" (47) and "accountability" (19) have replaced traditional terms such as "objectivity," which was only mentioned once in a decade, or "watchdog," with only five mentions. References to ethical behaviour are also in a secondary position, with a frequency rate of six. However, there is a notable number of references to the independent status of these journalists (28 mentions), in constant dialogue with the pressure groups and stakeholders with whom these networks can collaborate. This results in references to the editorial "credibility" of reporting projects, with a lower frequency of seven mentions.

The terms identified reflect a standardised professional practice, with no activity specific or inherent to collaborative dynamics in transnational networks mentioned with significant frequency. For example, the notion of the "editor in chief," highlighted in the academic literature as an essential role, was mentioned only four times.

The spectrum of topics dealt with by cross-border teams expands beyond the concept of "Europe," which holds all the top positions in RC3, to explore other areas such as news coverage of transnational corporations. Special attention is given to the agrifood and real estate industries, as well as the financial sector, corruption scandals, abuses of power and criminal activity, the power of lobby groups, public tenders, tax havens, and tax evasion (with the "Panama Papers" and the "Pandora Papers" as paradigmatic cases). Other issues emphasised are basic human rights, the climate crisis, water access, healthcare, and labour issues.

RC4 can be mapped conceptually on the basis of terms that suggest community and group relations: "us," "share," "networks," "join," "communities," "colleagues," "group," etc. References to the different scales of these networks (local, regional, national, and global) are included among the most frequently repeated words, along with mentions of the online space as a facilitator of connections free of geographical limitations. Under the technology descriptor, open-source culture is also significant, as are news sources.

In the frequency analysis by year, it was found that the words "data," "journalists," "journalism," "European," "investigative," "research," and "crossborder" appear in all years, as can be seen in Figure 2.
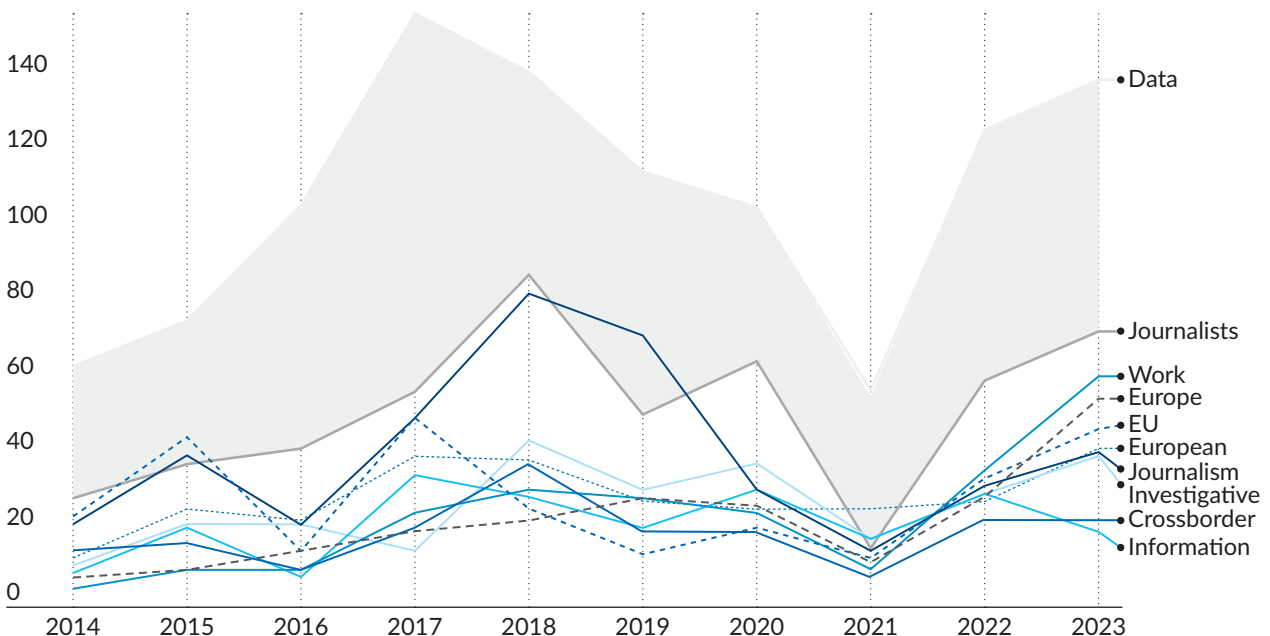
Figure 2. Evolution (2014–2023) of the 10 most frequently repeated words. Note: The full results are provided in the Supplementary File.

The words "corruption" and "media" are prominent in 2015, as is the word "freedom." The word "security" appears in 2017 with 30 repetitions (it would not do so again until 2022), along with terms associated with news coverage of corruption and money. "Housing" and "local" are consolidated in 2019, even to the point of constituting a section of their own. "Climate" takes fourth place in 2020 (it appears as early as 2016, but with

a lower frequency rate), also with its own section ("Climate & Energy"). "Right" does the same in 2021 and "work" in both 2022 and 2023. The terms "labour" and "people" gain prominence in 2023, with references to European legislation and the exploitation of workers in certain sectors and countries. These frequency lists broken down by year do not provide any distinguishing information other than that indicated above related to the emergence of certain topics associated with social, political, and economic issues that were prominent in Europe at specific times.

4.2. N-Gram Analysis

Table 2 presents the bigrams with 25 or more repetitions. Once again, "data" has a prominent presence, with four bigrams linking the concept to transnational networks. The source of data is also an important question, especially given the consideration of open government data as a priority resource for investigations of this kind. The pair of bigrams referring to the transnational scale framework are worth noting, with direct references to professionals operating "across Europe" and "across borders." References to the right of free access to information also have a prominent place in this list. Although freedom of information has not had a section of its own since it was added to the Dataharvest program in 2015, there are constant references to it using the terms "freedom of information" and "wobbing" to highlight the essential nature of this right. Equally notable are references to recurring news topics for this type of investigative journalism, such as organised crime and corruption, as well as security issues, with special attention to threats in the digital space.

Table 2. Bigrams with a frequency of 25 or more.

Bigram	Frequency	Bigram	Frequency
Data journalism	98	Organized crime	31
Investigative journalists	65	Social media	30
Investigative Journalism	58	Crossborder journalism	28
Across Europe	44	Access documents	28
International consortium	36	Reporting project	27
Consortium investigative	36	Corruption reporting	27
Freedom security	34	Across borders	27
Digital security	34	Data analysis	25
Data journalists	32	Member states	25
Crime corruption	31	Open data	25

Trigrams, as shown in Table 3, are not as numerous, but significant relationships also appear in three-word sequences with 10 or more repetitions. The top five positions are held by variations on the names of two of the main transnational journalist organisations, the International Consortium of Investigative Journalists and the Organized Crime Corruption Reporting Project ("International Consortium Investigative" with 36; "Consortium Investigative Journalists" with 31; "Crime Corruption Reporting" with 27; "Organized Crime Corruption" with 26; and "Corruption Reporting Project" with 26). Once again, references to Europe also appear, albeit at a considerable distance behind the top five ("EU member states" with 12).

Table 3. Trigrams with a frequency of 10 or more.

Bigram	Frequency
International Consortium Investigative	36
Consortium Investigative Journalists	31
Crime Corruption Reporting	27
Organized Crime Corruption	26
Corruption Reporting Project	26
EU Member States	12

4.3. Cluster Analysis

The documents were processed individually for clustering, encoding them using neural networks and converting them into numeric vectors. Four groups were obtained, as presented in Table 4, all of quite similar sizes: 295 units (group 0), 234 (group 1), 283 (group 2), and 203 (group 3). Although these groups share words between them, group 0 deals more with the supranational sphere and topics related to it, such as EU funding and its distribution. Group 1 relates more to professional practice, focusing on data training and skills with IT tools (R, Python, Excel). Group 2 focuses on investigative journalism, its different scales (local, national, supranational, etc.) and its methods. Finally, the terms in Group 3 repeat the basic ideas of Groups 1 and 2, but in a broader sense, with generic assessments of the use of information and security issues related to the external context.

Table 4. Document clusters.

Group 0		Group 1		Group 2		Group 3	
Word	Frequency	Word	Frequency	Word	Frequency	Word	Frequency
Data	316	Data	379	Journalism	336	Data	126
EU	265	R	98	Data	258	Security	97
European	215	Learn	91	Journalists	245	Digital	80
Journalists	149	Session	79	Investigative	170	Journalists	79
Europe	144	Python	78	Crossborder	112	Information	73
Public	100	Use	74	Media	101	Tools	70
Investigation	92	Well	66	Work	95	Use	60
Countries	85	Using	59	New	78	Work	57
Money	76	Excel	56	Local	74	Get	51
Project	72	Get	54	Europe	69	Research	49

Document titles closest to the centroids are understood to be the most significant in the grouped categories because they have the largest number of words present in the clusters identified. These titles are: "Europe's Big Uncovered Follow-the-Money Story" (Group 0), "Get Started With R: Intro & Importing Data" (Group 1), "Get Started With Data Journalism" (Group 2), and "Personal Data Wobbing on the Web" (Group 3). The full text is provided in the Supplementary File.

5. Discussion and Conclusions

Journalist networks operating across national borders and collaboratively investigating global stories have not been the object of a systematic academic review in proposals to update the media system model proposed by Hallin and Mancini. The exploratory study offered here contributes to the academic literature on this phenomenon, revealing how CBIJ has been conceptualised at Dataharvest and how it has broadened the comprehension of the media system described in 2004 and its subsequent revisions over the past two decades. To conclude this article, the main findings of the analysis are summarised below, contextualised with the academic literature on the subject.

In the case of the business model (H1), Dataharvest displays an evident interest in private foundations (Adessium and Rudolf Augstein Stiftung sponsored the first editions of the conference, for example) as a preferred funding option for CBIJ, limiting the monetising potential of these networks by relying on non-profit organisations. On this point, our results are highly consistent with other studies that signal the decisive role of foundations (e.g., Padania, 2019). The sections dedicated to the funding for this journalism underplay the importance of diversifying the revenue sources to achieve a more entrepreneurial model, like one based on collaborations with consolidated mainstream media organisations, for example. This would free the non-profit entities from dependence on donors and their interest in shaping public opinion by thematising the agendas of the organisations they support (Birnbauer, 2019, p. 177).

This last point has led Browne (2010) to point out the elitist nature of this kind of journalism, suggesting that it is consumed not so much by large transnational audiences as by small groups with notable decision-making power at the institutional level. In this respect, it is worth noting that references to audiences and the creation of strong connections with them using different strategies (such as gamification or interactive content) are not very frequent at the Dataharvest conferences. This reality raises questions about the continued relevance of the press market dimension as originally defined by Hallin and Mancini (as cited in Brüggemann et al., 2014, p. 1040; "how far the press reaches out to a broader audience"), in light of the addition of new strategies to a form of journalism aimed at social groups that are much smaller but have a big impact on setting the public agenda.

This in turn raises the question of the content reported in CBIJ (H2) and the creation of a symbolic supranational space where news outputs are offered to multiple countries in a context of mutual understanding (Hellmueller & Berglez, 2022, p. 11). The results of this study reveal the predominance of Europe as a prioritised topic, confirming Flew and Waisbord's (2015, p. 626) argument that this kind of news coverage "challenge[s] the authority and decision-making capacities of nation-states." CBIJ is thus disengaged from national political structures because only in this way is it possible to report on global stories related to transnational actors. Contributing to this is transnational parallelism, as indicated in the second hypothesis for this research, which involves an alignment of the professionals in these networks with the basic operating principles of the EU. According to Ides Debruyne, managing director of Journalismfund Europe, one of the biggest intermediaries involved in securing funding for CBIJ in Europe, the news report "needs to be relevant for the European audience. It is the only limitation in the topic" (EUROPE Ltd & Media Consulting Group, 2014, p. 29). This thematic predominance has, in fact, been the subject of criticism (Schiffrin, 2017), as certain topics are highlighted in a way that can limit the range of stories being investigated by transnational networks, which end up offering the same data, sources, and narratives.

Concerning the levels of journalist autonomy within collaborative networks (H3), it is worth noting that Dataharvest conferences favour integration into consolidated structures, a phenomenon consistent with the findings of this study in relation to the prominence of high-level organisations (Heft & Baack, 2022, p. 2341), which are the only ones able to invest the extra cost, time, and work required to secure funding from foundations through dedicated business teams while coordinating large, diverse groups operating in multiple countries. While the "local" phenomenon appeared as a buzzword in 2019, highlighting the added value of adapting global topics to the local context, most conference participants attending the Dataharvest sessions and workshops belong to networks that are highly institutionalised: International Consortium of Investigative Journalists, Organized Crime Corruption Reporting Project, Global Investigative Journalism Network, Investigate Europe, etc. This finding contradicts H3 of this study positing a higher level of autonomy for journalists thanks to initiatives outside stable and consolidated structures, as short-term partnerships, fluid work rhythms, non-hierarchical collaborations, and pioneering grassroots experiences (Hepp & Loosen, 2021) are displaced by "top media organizations" (Heft, 2021, p. 470).

It is also important to note that this study has not identified any specific collaborative practices. The results only suggest that Dataharvest gives considerable attention to data collection, processing, and visualisation, as an essential part of the work of cross-border networks. Sessions aimed at training attendees to work with data (in its many forms) have been a constant at the successive conferences, with a total of 420 events offered, the largest numbers being in 2017 (66), 2018 (56), and 2019 (50). This finding is similar to the information provided by Data Journalism and European Journalism Centre (2022) in its State of Data Journalism Survey, which highlights the skill deficits of journalists in this area and the need to address this problem. The incorporation of data into intertwined newsrooms has become indispensable because it facilitates a considerable increase in both the quantity and the quality of the stories produced (Heravi & Lorenz, 2020, p. 36). For example, the recent global investigations carried out by consortia of journalists have been intimately linked to the mass leaks of huge volumes of data such as the "Panama Papers" and the "Pandora Papers." These two projects and their work techniques are given special attention at Dataharvest.

This fascination with data, however, is not identified as positive in all the literature reviewed. Some authors criticise what they see as the imposition of a kind of "feudalism" due to the power of platforms and big tech over the data used. Candea (2020) refers to the hegemony of companies such as Google and Meta, pointing to the establishment of monolithic structures with clear imbalances arising from the lack of real control over the data by the team of professionals using them. Ownership and free management of data, as essential raw material for cross-border journalism networks, therefore needs to be added as a key indicator in order to define more precisely the autonomy of journalists, identified by Hallin and Mancini (2004) in their category of "journalistic professionalism," in the new convergent environment.

It is worth highlighting the scant attention Dataharvest has given to certain problems identified in the literature that have appeared only marginally in explorations of professional practices at the conferences. These include the questions of how to reduce competitiveness in multidisciplinary teams (Jenkins & Graves, 2022), how to manage increases in non-journalistic work (Ingram, 2019) and overlapping with daily routines. Other issues of a structural nature, such as the unconscious biases of journalists, conflicts of interests, ethical standards, or specialisation have also been largely ignored.

The preliminary results of this study contribute to a clearer understanding of CBIJ and its adaptation to an increasingly complex media environment with dialectic relationships between the global and the local, top

media organisations and low-level independent networks, prioritised topics, and subversive agendas. A revision of the model established by Hallin and Mancini reveals that these networks do not fit within the parameters defined by these authors in 2004, as they have developed qualities of their own in relation to the business model applied, the transnational orientation of reporters, the topics addressed, and to a lesser extent, the professional practices adopted. As Archetti (2019, p. 2151) suggests, "labels don't apply," and a relational approach to this phenomenon is needed in order to understand its complexity.

The optimistic view of cross-border journalism as a collaboration for the common good (Martínez de la Serna, 2018) should not prevent future research from taking a critical approach to this phenomenon and the challenges it poses. In this respect, some authors argue that while collaboration is imposed as the dominant narrative, journalists operate within the cultural and professional context of their respective countries, thus undermining any genuine integration (Meyen, 2018; Michailidou & Trenz, 2023). This and other issues mentioned earlier (such as editorial interference by donors or the hegemony of data) require further study to determine the real impact of CBIJ on contemporary society.

Acknowledgments

Conflict of Interests

Data Availability Statement

The data that support the findings of this study are openly available in idUS—Depósito de Investigación de la Universidad de Sevilla at https://doi.org/10.12795/11441/155231, reference number 11441/155231.

Supplementary File

Supplementary File for this article is available online in the format provided by the author (unedited).

References

Alfter, B. (2016). Cross-border collaborative journalism: Why journalists and scholars should talk about an emerging method. *Journal of Applied Journalism & Media Studies*, *5*(2), 297–311. https://doi.org/10.1386/ajms.5.2.297_1

Alfter, B. (2019). *Cross-border collaborative journalism: A step-by-step guide*. Routledge.

Alfter, B. (2021). The European Union and the rise of collaboration. In H. De Burgh & P. Lashmar (Eds.), *Investigative journalism* (pp. 217–229). Routledge.

Alfter, B., & Candea, S. (2019). Cross-border collaborative journalism: New practice, new questions. *Journal of Applied Journalism & Media Studies*, *8*(2), 141–149. https://doi.org/10.1386/ajms.8.2.141_1

Archetti, C. (2019). Mapping transnational journalism in the age of flows: Or how I ditched "foreign correspondence" and the "immigrant press" and started to love histoire croisée. *Journalism Studies*, *20*(15), 2150–2166. https://doi.org/10.1080/1461670X.2019.1568905

Bird, M., & Candea, S. (2017, July 6). An investigative toolkit for the post-Snowden era. *NiemanReports*. https://niemanreports.org/articles/an-investigative-toolkit-for-the-post-snowden-era

Birnbauer, B. (2019). *The rise of nonprofit investigative journalism in the United States*. Routledge.

Browne, H. (2010). Foundation-funded journalism: Reasons to be wary of charitable support. *Journalism Studies*, *11*(6), 889–903. https://doi.org/10.1080/1461670X.2010.501147

Brüggemann, M., Engesser, S., Büchel, F., Humprecht, E., & Castro, L. (2014). Hallin and Mancini revisited: Four empirical types of Western media systems. *Journal of Communication*, *64*(6), 1037–1065. https://doi.org/10.1111/jcom.12127

Bunce, M., Wright, K., & Scott, M. (2018). "Our newsroom in the cloud": Slack, virtual newsrooms and journalistic practice. *New Media & Society*, *20*(9), 3381–3399. https://doi.org/10.1177/1461444817748955

Buschow, C., & Suhr, M. (2022). Business ecosystems in digital journalism: Cross-border collaborative investigations as a novel organizational form. In S. Baumann (Ed.), *Handbook on digital business ecosystems: Strategies, platforms, technologies, governance and societal challenges* (pp. 292–306). Edward Elgar Publishing.

Candea, S. (2020). *Cross-border investigative journalism: A critical perspective* [Unpublished doctoral dissertation]. University of Westminster. https://westminsterresearch.westminster.ac.uk/item/v402w/cross-border-investigative-journalism-a-critical-perspective

Carlson, M. (2016). Metajournalistic discourse and the meanings of journalism: Definitional control, boundary work, and legitimation. *Communication Theory*, *26*(4), 349–368. https://doi.org/10.1111/comt.12088

Carson, A. (2020). *Investigative journalism, democracy and the digital age*. Routledge.

Clement, M., Lepthien, A., Schulz, P., & Loosen, W. (2018). *Alternative models of financing investigative journalism*. Hans-Bredow-Institut. https://www.hans-bredow-institut.de/uploads/media/Publikationen/cms/media/p21vfeg_Financing-JournalismClement_et-al_180627.pdf

Couldry, N., & Hepp, A. (2009). What should comparative media research be comparing? Towards a transcultural approach to "media cultures." In D. K. Thussu (Ed.), *Internationalizing media studies* (pp. 32–47). Routledge.

Data Journalism & European Journalism Centre. (n.d.). *The state of data journalism survey*. https://datajournalism.com/survey/2022

EUROPE Ltd., & Media Consulting Group. (2014). *Feasibility study on European research grants for cross-border investigative journalism*. European Union.

European Commission. (2018). *A multi-dimensional approach to disinformation: Report of the independent high level group on fake news and online disinformation*. Publications Office of the European Union. https://op.europa.eu/en/publication-detail/-/publication/6ef4df8b-4cea-11e8-be1d-01aa75ed71a1/language-en

European Parliament. (2018). *Report on media pluralism and freedom in the European Union* (No. 2017/2209(INI)). https://www.europarl.europa.eu/doceo/document/A-8-2018-0144_EN.html

Flew, T., & Waisbord, S. (2015). The ongoing significance of national media systems in the context of media globalization. *Media, Culture & Society*, *37*(4), 620–636. https://doi.org/10.1177/0163443714566903

Gearing, A. A. (2016). *Global investigative journalism in the network society* [Unpublished doctoral dissertation]. Queensland University of Technology. https://eprints.qut.edu.au/101275

Graves, L., & Konieczna, M. (2015). Sharing the news: Journalistic collaboration as field repair. *International Journal of Communication*, *9*, 1966–1948. https://ijoc.org/index.php/ijoc/article/viewFile/3381/1412

Grill, C., & Boomgarden, H. (2017). A network perspective on mediated Europeanized public spheres: Assessing the degree of Europeanized media coverage in light of the 2014 European Parliament elections. *European Journal of Communication*, *32*(6), 568–582. https://doi.org/10.1177/0267323117725971

Hallin, D. C. (2020). Comparative research, system change, and the complexity of media systems. *International Journal of Communication*, *14*, 5775–5786. https://ijoc.org/index.php/ijoc/article/view/14550/3274

Hallin, D. C., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (Eds.). (2012). *Comparing media systems beyond the Western world*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (2017). Ten years after comparing media systems: What have we learned? *Political Communication*, *34*(2), 155–171. https://doi.org/10.1080/10584609.2016.1233158

Hallin, D. C., Mellado, C., & Mancini, P. (2023). The concept of hybridity in journalism studies. *The International Journal of Press/Politics*, *28*(1), 219–237. https://doi.org/10.1177/19401612211039704

Hamilton, J. T. (2016). *Democracy's detectives. The economics of investigative journalism*. Harvard University Press.

Haug, C. (2013). Organizing spaces: Meeting arenas as a social movement infrastructure between organization, network, and institution. *Organization Studies*, *34*(5/6), 705–732. https://doi.org/10.1177/0170840613479232

Heft, A. (2021). Transnational journalism networks "from below": Cross-border journalistic collaboration in individualized newswork. *Journalism Studies*, *22*(4), 454–474. https://doi.org/10.1080/1461670X.2021.1882876

Heft, A., Alfter, B., & Pfetsch, B. (2019). Transnational journalism networks as drivers of Europeanisation. *Journalism*, *20*(9), 1183–1202. https://doi.org/10.1177/1464884917707675

Heft, A., & Baack, S. (2022). Cross-bordering journalism: How intermediaries of change drive the adoption of new practices. *Journalism*, *23*(11), 2328–2346. https://doi.org/10.1177/1464884921999540

Hellmueller, L., & Berglez, P. (2022). Future conceptual challenges of cross-border journalism. *Journalism*, *24*(11), 2359–2378. https://doi.org/10.1177/14648849221125535

Hepp, A., & Loosen, W. (2021). Pioneer journalism: Conceptualizing the role of pioneer journalists and pioneer communities in the organizational re-figuration of journalism. *Journalism*, *22*(3), 577–595. https://doi.org/10.1177/1464884919829277

Heravi, B. R., & Lorenz, M. (2020). Data journalism practices globally: Skills, education, opportunities, and values. *Journalism and Media*, *1*(1), 26–40. https://doi.org/10.3390/journalmedia1010003

Houston, B. (2016, April 13). Panama Papers showcase power of a global movement. *Global Investigative Journalism Network*. https://gijn.org/panama-papers-showcase-power-of-a-global-movement

Houston, B. (2021). The challenges and successes of global journalism collaborations. In S. J. A. Ward (Ed.), *Handbook of global media ethics* (pp. 1093–1104). Springer. https://doi.org/10.1007/978-3-319-32103-5_54

Hume, E., & Abbot, S. (2017). *The future of investigative journalism: Global, networked and collaborative*. Center for Media, Data and Society. https://cmds.ceu.edu/sites/cmcs.ceu.hu/files/attachment/article/1129/humeinvestigativejournalismsurvey_0.pdf

Humprecht, E., Castro Herrero, L., Blassnig, S., Brüggemann, M., & Engesser, S. (2022). Media systems in the digital age: An empirical comparison of 30 countries. *Journal of Communication*, *72*(2), 145–164. https://doi.org/10.1093/joc/jqab054

Ingram, M. (2019, February 1). How foundation funding changes the way journalism gets done. *Columbia Journalism Review*. https://www.cjr.org/analysis/foundation-funding-journalism.php

Jenkins, J., & Graves, L. (2022). Do more with less: Minimizing competitive tensions in collaborative local journalism. *Digital Journalism*. Advance online publication. https://doi.org/10.1080/21670811.2022.2026237

Kaplan, D. E. (2013). *Global investigative journalism: Strategies for support*. Center for International

Media Assistance. https://www.cima.ned.org/publication/global-investigative-journalism-strategies-for-support

Konow-Lund, M. (2019). Negotiating roles and routines in collaborative investigative journalism. *Media and Communication*, *7*(4), 103–111. https://doi.org/10.17645/mac.v7i4.2401

Kraidy, M. M. (2011). The rise of transnational media systems. In D. C. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the western world* (pp. 177–200). Cambridge University Press.

Krüger, U., Knorr, C., & Finke, F. (2019). Cross-border non-profit investigative journalism networks: A structural analysis of the field. In J. Meers & B. Houston (Eds.), *A collection of research papers submitted for the global investigative journalism conference* (pp. 404–428). Investigative Journalism Education Consortium.

Lampel, J., & Meyer, A. D. (2008). Field-configuring events as structuring mechanisms: How conferences, ceremonies, and trade shows constitute new technologies, industries, and markets. *Journal of Management Studies*, *45*(6), 1025–1035. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1862360

Liu, J., Liu, X., & Jensen, K. B. (2020). Comparative media studies in the digital age: Taking stock, looking ahead. *International Journal of Communication*, *14*, 5754–5760. https://ijoc.org/index.php/ijoc/article/view/14548

Mancini, P. (2015). The news media between volatility and hybridization. In J. Zielonka (Ed.), *Media and politics in new democracies: Europe in a comparative perspective* (pp. 24–37). Oxford University Press.

Maness, M. (2013). *Finding a foothold: How nonprofit news ventures seek sustainability*. Knight Foundation. https://knightfoundation.org/reports/finding-foothold

Martínez de la Serna, C. (2018, March 30). Collaboration and the creation of a new journalism commons. *Columbia Journalism Review*. https://www.cjr.org/tow_center_reports/collaboration-and-the-journalism-commons.php

Mesquita, L., & de-Lima-Santos, M. F. (2021). Collaborative journalism from a Latin American perspective: An empirical analysis. *Journalism and Media*, *2*(4), 545–571. https://doi.org/10.3390/journalmedia2040033

Meyen, M. (2018). Journalists' autonomy around the globe: A typology of 46 mass media systems. *Global Media Journal*, *8*(1), 1–23. https://doi.org/10.22032/dbt.35003

Michailidou, A., & Trenz, H. J. (2023). Mimicry, fragmentation, or decoupling? Three scenarios for the control function of EU correspondents. *The International Journal of Press/Politics*, *28*(3), 671–690. https://doi.org/10.1177/19401612211058674

Ng, Y. M. M. (2021). Understanding collaborative journalism with digital trace data and crowdsourced databases. In V. Bélair-Gagnon & N. Usher (Eds.), *Journalism research that matters* (pp. 115–130). Oxford University Press.

Padania, S. (2019). *How to fund investigative journalism: Insight from the field and its key donors*. DW Akademie. https://akademie.dw.com/en/how-to-fund-investigative-journalism/a-55039200

Sambrook, R., Lewis, C., Alfter, B., Kayser-Bril, N., Koch, A., & Clements, J. (2018). *Global teamwork: The rise of collaboration in investigative journalism*. Reuters Institute for the Study of Journalism.

Schiffrin, A. (2017). *Same beds different dreams? Charitable foundations and newsroom independence in the Global South*. Center for International Media Assistance. https://www.cima.ned.org/wp-content/uploads/2017/02/CIMA-Media-Philanthropy_Schiffrin.pdf

Schüßler, E., Grabher, G., & Müller-Seitz, G. (2015). Field-configuring events: Arenas for innovation and learning? *Industry and Innovation*, *22*(3), 165–172. https://doi.org/10.1080/13662716.2015.1038098

Wuergler, L., & Cancela, P. (2022). How do investigative journalists initiate their stories? Exploring the investigative ecosystem of Switzerland. *Journalism Practice*. Advance online publication. https://doi.org/10.1080/17512786.2022.2103019

About the Author

Lorena R. Romero-Domínguez is a tenured lecturer at the University of Seville (Spain), has a bachelor's degree and a PhD in journalism. Loren is a member of the research group Media, Communication Policies, and Democracy in the European Union, co-editor of the editorial collection *Communication Sciences* (Seville University Press), and member of the Observatory of Transparency and Open Data (Polytechnic University of Valencia). Lorena is also a visiting professor at the Johannes-Gutenberg Mainz Universität (Germany), Cardiff University (Wales), Konstanz Universität (Germany), and HU Berlin (Germany).

cogitatio

ARTICLE

The Evolution of Government Intervention in the Mediterranean Media System: Spain, France, and Portugal

Ana Fernández-Viso [ID] and Isabel Fernández-Alonso [ID]

Department of Media, Communication, and Culture, Autonomous University of Barcelona, Spain

Correspondence: Ana Fernández-Viso (ana.fernandez.viso@uab.cat)

Abstract

Based on the comparative analysis of the three Western media system models distinguished by Daniel Hallin and Paolo Mancini (2004), this article revisits their thesis of a tendency towards the convergence of the Mediterranean model and the Liberal model—in terms of the weakening of links between media institutions and the political sphere—two decades after it was first posited. By studying the degree and nature of state intervention in the media systems of Spain, France, and Portugal in the 21st century, the aim is to ascertain whether, within a context of growing political polarisation and shrinking journalistic industry income, the distinctive characteristics of the role of the state in the Mediterranean model remain the same or have changed—and in what sense. The contextualised analysis of Spanish, French, and Portuguese policies relating to public service media, independent audiovisual media regulatory bodies, media subsidies, and state advertising on the one hand allows us to question whether state intervention in Mediterranean media systems has weakened, thereby reaffirming the thesis of the importance of nation-states in media governance and the relevance of the comparative study of national media systems in the era of digital globalisation. And, on the other hand, it enables continuities, discontinuities, and differences between the three countries to be identified in relation to the logic of clientelism that Hallin and Mancini observed in their media policies in 2004, as well as some initial elements for their interpretation to be noted.

Keywords

France; media policies; media subsidies; media systems; public service media; Spain; Portugal

---

1. Introduction

In their seminal comparative study of 18 Western media systems conducted two decades ago, Daniel Hallin and Paolo Mancini (2004) distinguished three models for the configuration and functioning of media systems depending on their relationship with the political system: the North Atlantic or Liberal model (Canada, United States, Great Britain, and Ireland), the North/Central European or Democratic Corporatist model (Germany, Austria, Belgium, Denmark, Finland, Norway, Netherlands, Sweden, and Switzerland), and the Mediterranean or Polarised Pluralist model (Spain, France, Greece, Italy, and Portugal). This distinction was based on an analysis of four dimensions: the development of the media market, political parallelism, the professionalisation of journalism, and the role of the state in the media system.

The authors analyse the development of the media market using indicators relating to the supply, demand, and profitability of the sector. The concept of "political parallelism" refers to the degree and nature of the links between the media and political parties or the main ideological tendencies of society, which can be observed, for example, in both the editorial lines of media outlets and the stance of editors and journalists. The issue of the professionalisation of journalism is addressed by examining journalists' level of autonomy, shared professional rules and routines, and degree of orientation towards an ethic of public service. Lastly, the analysis of state intervention in the media system distinguishes three roles (owner, regulator, and funds provider—via subsidies and state advertising), which are examined from a twofold perspective of the level (low vs high) and the logic (rational-legal authority vs clientelism) of such intervention.

Within this framework of analysis, the development of the Mediterranean media system was, according to Hallin and Mancini, marked by the late and contested adoption of liberal institutions, including democracy (and the ensuing freedom of expression) and industrial capitalism, which in turn led to delays in establishing a modern press industry—without the press ever becoming a mass product—and the persistence of government control mechanisms and emphatic political differences. For Hallin and Mancini (2004), this media system is characterised by: weak market development; a high degree of political parallelism and polarised pluralism; frequent instrumentalisation of the media by political and economic actors, which constrains journalistic autonomy; and a notable role of the state as the owner, regulator, and funder of the media, albeit often permeated by a logic of clientelism.

However, from a diachronic perspective, they considered that, throughout the 20th century, the characteristic structures, practices, and values of the Liberal model (high industrial development, a low level of political parallelism, a high degree of professionalisation of journalism, and little state intervention with a rational-legal logic), the greatest exponent of which was the United States, had gradually and considerably displaced those of the other two media systems in Europe. They even ventured to predict a future convergence or homogenisation of Western media systems, always from the perspective of their interaction with political systems and in the sense of increasingly operating in accordance with a logic of their own, which would displace the political logic (Hallin & Mancini, 2004, p. 253).

That thesis has been supported by the recurrent arguments concerning the growing "Americanisation" and/or commercialisation of European media systems, which have been gaining momentum in academic debate since the 1990s (Blumler & Gurevitch, 2001; Chalaby, 1996; Humphreys, 1996). These considerations have been reinforced by reflections on the impacts of digitalisation, globalisation, economic

integration, and the deregulation and liberalisation of Western media markets that have favoured, among other phenomena, the formation of large transnational conglomerates, the harmonisation of media policies, and the questioning of the relevance of national spaces in the digital era (Flew & Waisbord, 2015; Mansell & Raboy, 2014; Mattoni & Ceccobelli, 2018; McChesney, 2001; McPhail, 2014; Murdock & Golding, 1999; Papathanassopoulos et al., 2023).

Over the past 20 years in Europe, the mentioned changes have coincided with the expansion and growth of political polarisation and populism (Casal Bértoa & Rama, 2021; Schulze et al., 2020)—both of which can also be observed in the media (Balčytienė & Juraitė, 2015)—and with the crisis affecting the media as both an institution and an industry (Trappel et al., 2015). Within this context of European-wide phenomena and of forces driving the homogenisation of media systems, this article assumes the hypothesis of the validity of the concept of the media system for comparative analysis (Hallin, 2020, 2021; Mancini, 2020) and aims firstly to ascertain whether state intervention in the three Polarised Pluralist systems differs from Hallin and Mancini's 2004 characterisation of it, and in what sense. Secondly, it aims to compare the evolution of such intervention in Spain, France, and Portugal for the purposes of identifying continuities, discontinuities, and differences between the three cases and trying to explain them.

These three countries were chosen because of the way they fit differently into the Mediterranean model. While various reviews of this media system typology deem that both Spain and France—as well as Italy and Greece—belong in this model (Brüggemann et al., 2014; Büchel et al., 2016), others consider that France does not (Humprecht et al., 2022), due to it having certain features of the Democratic Corporatist model, as Hallin and Mancini (2004) had already noted. As for Portugal, its inclusion in the Mediterranean model has been questioned by those reviews due to it having a more liberal political culture than the authors had initially diagnosed, which they themselves had acknowledged (Hallin & Mancini, 2012).

Based on Hallin and Mancini's distinction of the three roles of the state in the media system (media owner, regulator, and funds provider to the sector via media subsidies and state advertising) and on the indicators they used to analyse them, three issues have been taken as indicative of the intensity and nature of that intervention: the governance and independence of public service media (PSM); the powers and governance of independent media regulatory bodies; and the allocation of both media subsidies and state advertising. These are, in fact, three issues of particular concern to the European authorities, as evidenced by their inclusion in the European Media Freedom Act, the first European law to regulate them. A qualitative analysis of the policies on these issues in France, Spain, and Portugal will enable a better understanding of their similarities and differences regarding both the intensity and logic of state intervention in their respective media systems.

The analysis of the three aspects has been approached with an essentially qualitative methodology, based on documentary analysis. Firstly, the legal texts modifying the regulation of these issues in Spain, France, and Portugal over the past 20 years, as well as the academic literature examining them, have been studied to identify trends in, and the nature of, the changes. This initial analysis has been complemented by the study of the circumstances and the political and economic context framing the adoption of these changes. Secondly, the process of implementing the changes relating to the governance model of both the PSM and the independent media regulatory bodies has been analysed, with the aim of identifying possible links between political parties and the persons selected to form part of those governing bodies. The résumés of

the appointees, the media coverage of their appointments and particularly of the contested decisions taken by those bodies, and the academic literature available on these processes have been reviewed. Thirdly, public information and available reports on the allocation of media subsidies and state advertising in the three countries, as well as criticism from private actors about it, have been examined. Finally, it should be noted that part of the research for this study is based on the results of previous research on media policies in Southern Europe that the authors have been conducting over the past 20 years.

2. Spain: Persistence of Clientelist Forms of Intervention

Hallin and Mancini (2004) presented Spain as a purely Polarised Pluralist system, where government intervention in the media system combines elements characteristic of the Welfare State with others stemming from authoritarian traditions.

Regarding the lines of analysis that we are pursuing in this study, they underscored partisan control of PSM, obviously without mentioning the regulator because it did not exist at that time. They also noted that "unlike formal press subsidies in France, Italy, or the Democratic Corporatist countries, government advertising is fairly often used in Spain as a form of political pressure" (Hallin & Mancini, 2004, p. 121). Let's see how the situation has changed.

2.1. PSM: Frustrated Attempts at Reform

The regulation of PSM in Spain has had significant ups and downs over the past two decades. The governance system has evolved from the government one described by Hallin and Mancini into the current one that, on paper at least, combines professional and parliamentary elements. In between, Spanish PSM experienced a very positive period in terms of audience share and even international recognition as a result of the reform promoted by Prime Minister José Luis Rodríguez Zapatero's socialist government (Ley 17/2006), which sought to foster broad parliamentary agreements (to which the opposition was committed at that time) for appointing people to the high-level positions (president and board of directors) of Radiotelevisión Española (RTVE). That period ended when the conservative Mariano Rajoy came to power as prime minister, who imposed an absolute majority in the second round of voting (Real Decreto-ley 15/2012) as a system for appointing people to these high-level positions (Fernández-Viso & Fernández-Alonso, 2019).

Taking advantage of the conservative Partido Popular's (PP's) loss of an absolute majority, a new reform (Ley 7/2017) promoted by the opposition parties of different political leanings introduced, for the very first time, a public competition as the formula for putting forward candidates for the above-mentioned positions, even though the parliamentary chambers were ultimately responsible for appointing the 10 members of the board of directors (six by the Congress of Deputies and four by the Senate) and the president (elected by the Congress of Deputies from among the 10 members of the board of directors).

This new system turned out to be a huge failure. A committee of experts nominated by the parliamentary groups unanimously agreed to put forward 20 candidates (the top-scoring ones out of a total of 95) for the deputies and senators to select the 10 members of the board of directors and then the president from among them. However, an agreement between the two big Spanish political parties (the socialist Partido

Socialista Obrero Español and the conservative PP), alongside the conservative Basque nationalist party, and the left-wing populist party Podemos, decided to ignore the experts' assessment, arguing that, from the 20 candidates put forward, it was impossible to guarantee gender parity (which they themselves had not guaranteed in the composition of the committee of experts). Particularly striking was the fact that the names of the appointees to the new RTVE positions (selected by the four above-mentioned political parties based on their respective parliamentary representation) were publicly announced even before the candidates' required parliamentary appearances had ended (before the rounds of voting, in fact). Only three of the 20 candidates given the highest scores by the experts were among those elected. They even appointed one candidate whose management project had been awarded zero points in the competition stage (Fernández-Alonso, 2023).

In parallel to this, and based on Ley 8/2009, advertising as a source of RTVE funding was axed, meaning that PSM have since essentially had to rely on income from the General State Budgets, which amounted to €442.9 million in 2022 and increased to €546.1 in 2023. Added to this amount are several levies that private operators pay, such as the one for using the radioelectric spectrum, which put RTVE's annual income at €1.075 billion in 2022.

As it stands, both national public radio and television in Spain occupy a very modest place in terms of audience share, which is usually surpassed by the main private channels. This does not happen in all of Spain's autonomous communities (regions), where some public television operators are audience share leaders, as is the case in Catalonia. However, complaints about government interference are also common in the regional sphere (Fernández-Alonso, 2023).

2.2. The State Audiovisual Media Regulator: Belated Creation and Limited Powers

Spain was one of the last European countries to approve the creation of an independent regulatory body for audiovisual media, and when it did so, it settled on a model the likes of which Europe had never seen before: a body combining the regulation of five sectors—one of which was the audiovisual and telecommunications sector—with competition oversight. Formed in 2013, the National Markets and Competition Commission (Comisión Nacional de los Mercados y la Competencia [CNMC]) incorporated the activities of six pre-existing bodies and assumed the mandate under the 2010 Spanish audiovisual media law (Ley 7/2010) to create a national independent audiovisual media regulatory authority. When it did so, however, it significantly reduced the powers provided for it by the aforementioned law and/or the powers that various academic and professional sectors had called for. Fundamental decisions for ensuring the media system's external pluralism, such as granting and renewing audiovisual media licences and authorising business with them, or having ultimate control over compliance with limits relating to the acquisition of shares by and among operators, remained in the hands of the Executive.

The attribution of powers to the CNMC in the audiovisual media sphere did not undergo any substantial changes in the new Spanish audiovisual media law passed in July 2022 (Ley 13/2022) despite the criticism prompted not only by the above-mentioned difference in powers compared to its European counterparts—contrary to the EU's recommendations—but also by the lack of specific regulatory powers in the audiovisual media sphere (which was not the case in other sectors) and its clearly economistic approach, which put the proper functioning of the market above the assurance of fundamental rights for democracy

exercised in the audiovisual public sphere. Indeed, such rights are not even mentioned in the law creating the CNMC (Fernández-Viso, 2017).

Lastly, the CNMC's governance model is another aspect that has caused controversy because it has a government system for the election of people to its high-level positions. Its 10 council members, from among whom the chair is elected, are put forward and appointed by the government after the candidates have appeared before the Congress's Economy Committee, where an absolute majority is needed to veto their appointment. Over the 10 years of this macro-regulator's existence, it has had several council members who had previously been advisers to the government appointing them.

In Spain, there are three audiovisual media regulators at the autonomous-community (regional) level. One of these, the Catalan Audiovisual Council (Consell de l'Audiovisual de Catalunya), has wide-ranging powers in local and regional spheres, including those relating to external pluralism, which the CNMC lacks. However, these three regulators are formed by council members appointed by the regional parliaments in accordance with party quotas.

2.3. State Advertising as a Covert Way of Subsidising the Media

In Spain, direct media subsidies on a national scale were axed at the end of the 1980s, with the reduced VAT rate of 4% being the only surviving indirect subsidy (extended to digital media outlets in 2020). However, it is worth noting that, in September 2023, the acting Spanish government announced the preparation of a programme aimed at driving forward the online transformation and cybersecurity of journalistic firms (Cruz Peña, 2023). Nevertheless, there is still a considerable number of regional subsidies that are awarded essentially when certain language-related criteria are met. These mostly benefit media in one of Spain's co-official languages other than Spanish (Aguado-Guadalupe & Blasco-Gil, 2020).

However, state and regional government advertising is unquestionably the main way of transferring public funds to media outlets in Spain, which involves huge amounts of money at national, regional, and local levels. While there is a clear lack of transparency in the planning and procurement processes for these campaigns (recognized by the Constitutional Court), transparency laws have led some autonomous communities to publish some interesting data. When analysing them, media outlets aligned with the incumbent powers are found to benefit clearly from state and regional government advertising campaigns (Derecom, 2022).

Regarding the Government of Spain, important figures relating to both state and state-controlled companies' commercial advertising are available, which are detailed in the annual reports published by the Office of the Prime Minister of the Government. Thus, in the 2022 financial year, the General State Administration and other entities forming part of the state public sector invested €102.5 million in state advertising campaigns, with an additional €116.4 million being spent on commercial advertising campaigns (Comisión de Publicidad y Comunicación Institucional, 2023). However, it has been impossible to get information on how these campaigns impacted media firms' accounts, not even after the opposition parties had asked for it in the national parliament (Fernández-Alonso & Espín, 2022).

3. France: Intense Intervention and a Political Culture of Checks and Balances

Hallin and Mancini (2004) characterised France as a case on the boundary between the Mediterranean model and the Democratic Corporatist model, arguing that, besides having a well-developed mass press, "it has a strong cultural tradition of the state as an embodiment of the 'general will' and a long history of professionalized administration" (p. 136). In their view, this explains why clientelist practices do not predominate over rational-legal authority, unlike in other countries in the Mediterranean setting.

Regarding the issues analysed in this article, the authors highlight the fact that the early creation of the Higher Audiovisual Council (Conseil Supérieur de l'Audiovisuel [CSA]) in 1989 has since limited government interference in the appointment of PSM directors. They likewise underscore the fact that France—along with Italy—is the country that awards the highest volume and variety of subsidies to all kinds of press, with such subsidies accounting for 10–15% of the publishers' income. Let's see if these elements persist two decades later.

3.1. PSM: Curbing a Shift Towards Regovernmentalisation

In a country where public radio and television channels are audience share leaders, this audiovisual media offering is managed by the companies Radio France, France Télévisions, and France Médias Monde, the latter of which broadcasts radio and television content in 21 languages across the globe.

Pursuant to the Léotard Law (Loi n° 1986-1067), the most recent amendment of which was in 2021, the board of directors of Radio France is formed by a president and 10 board members. That law states that the president shall be appointed by a majority of the members of the Audiovisual and Digital Communication Regulatory Authority (Autorité de Régulation de la Communication Audiovisuelle et Numérique [ARCOM]) in a reasoned decision based on the strategic projects submitted by the candidates. The board members are: one deputy and one senator, respectively appointed by the Standing Committee for Cultural Affairs in each of the legislative chambers; four representatives of the state; four independent figures appointed by ARCOM; and two members elected from among Radio France's staff.

The Léotard Law also sets out that the board of directors of France Télévisions shall be formed by a president and 14 board members. The distribution and system for electing them is the same as for Radio France, though there are five representatives of the state and five board members appointed by ARCOM instead of four in both instances in the case of Radio France. This is also the case for the board of directors of France Médias Monde, though at least one of the five members appointed by ARCOM must have proven experience in the field of the Francophonie and another must represent the Assembly of French Citizens Abroad.

While the system for appointing board members has remained stable, the appointment of the presidents of the three companies by the independent regulator—first established in 1982—was re-established during the presidential term of the socialist François Hollande (Loi n° 2013-1028, on the independence of PSM), thereby reversing the provisions of Loi n° 2009–258 promoted during the presidential term of the conservative Nicolas Sarkozy, pursuant to which people would be appointed to these positions by government decree. Later on, Emmanuel Macron felt that such an appointment should fall to the board of directors (Khun, 2019, p. 77), but the idea was never implemented.

The central role of the regulator in the appointment of the PSM directors has not been without some controversy. This was the case for the appointment of the current president of France Télévisions, Delphine Ernotte, chosen by the CSA in 2015 and re-confirmed in her position in 2020. The Confédération Française Démocratique du Travail and Confédération Française de l'Encadrement trade unions filed complaints with several agencies about the alleged pressure by the regulator's president to promote her appointment ("Le CSA a-t-il," 2018).

Regarding the funding of PSM, the recent axing of the licence fee—their main source of income—by Loi n° 2022-1157 is significant. This was the outcome of an electoral promise made by Macron to improve households' purchasing power. The above-mentioned law sets out that, in 2023 and 2024, PSM funding will come from a fraction of the VAT set in the Finance Law (€3.8 billion for 2023). The bill, however, envisaged that funding would be linked to the General State Budgets. That idea was thrown out for several reasons. One of these was a report by the General Inspectorate of Finance and the General Inspectorate of Cultural Affairs, which issued a warning about the volatility of that formula, which had weakened PSM in other countries (Zarka, 2022). At the same time, during the debate that led to the reform, several voices (trade unions, cultural stakeholders, and left-wing parties) raised concerns about the risks to the independence of PSM that a change in the funding model might entail (Jannic-Cherbonnel, 2022).

However, the 2023 barometer on trust in the media among the French indicates that 48% positively value the existence of PSM, whereas only 11% negatively value it (Kantar Public, 2023).

3.2. Strengthening of the Regulator

ARCOM is an independent public authority created in 2022. It is the outcome of a merger between the CSA and the High Authority for the Dissemination of Works and the Protection of Rights on the Internet (Haute Autorité pour la Diffusion des Œuvres et la Protection des Droits sur Internet) under Loi n° 2021–1382. This new regulator has nine members, who have a non-renewable term of office of six years. Its chair is appointed by the President of France with the approval of 3/5ths of the members of the Standing Committee for Cultural Affairs in each of the legislative chambers. Three members are appointed by the president of the National Assembly and a further three by the president of the Senate. The favourable agreement requirement is the same as that for the appointment of the chair, but in this case only by the committee of the respective chamber. One member is appointed by the vice-president of the Council of State and another by the president of the Court of Cassation.

The members appointed by the Council of State and the Court of Cassation were introduced under the 2021 reform. The other members are appointed pursuant to Loi n° 2013–1028 mentioned further above. This law reduced the number of members of the then CSA appointed by the President of France from three to one, and set the qualified majority needed in the standing committees to appoint the other six members of the current ARCOM.

The regulator's powers, which had traditionally been very significant in the audiovisual media sector, have gradually been increased by various laws as a result of technological transformations and the implications thereof, such as the major deployment of streaming platforms and social media. ARCOM therefore has two main lines of action: to promote the influence, diversity, and creativity of both French audiovisual media and film; and to protect citizens in the face of new digital challenges by developing a safer internet.

3.3. The Key Role of Media Subsidies

France has a long tradition of media subsidies and undoubtedly the most complex system and the biggest budget of all the countries in the Western European setting. The latest available data at the time of writing this article were those corresponding to 2022: €110.4 million in direct subsidies, of which €28 million were for the promotion of pluralism (e.g., subsidies for various publications with few advertising resources, local and proximity media outlets, and overseas media outlets); €51 million for transport and distribution; and €31.4 million for investment in projects aimed at addressing the challenges of the green and digital transition (Ministère de la Culture, 2023). Added to these are nine new indirect subsidy modalities, which are essentially fiscal and social in nature. There was also an exceptional subsidy for self-employed journalists during the Covid-19 pandemic. The subsidy modalities and the beneficiaries thereof (since 2012) are published in some considerable detail on the Ministry of Culture's website, which is the competent body in this area.

However, criticism is often levelled at the distribution of direct subsidies. For example, Mediapart (Plenel, 2023) and the ACRIMED Observatory (Friot, 2022) have both performed analyses denouncing the fact that the big beneficiaries of such subsidies are always the large media outlets. Be that as it may, a report by the Senate (Karoutchi, 2021) showed that, without counting fiscal expenditures, media subsidies accounted for 21.4% of the sector's turnover.

Thus, both that report and other studies (Bastin, 2019) have put forward numerous ideas for simplifying and adapting the subsidy system to the new technological and consumption habit context. These include the incorporation of mechanisms that place conditions upon beneficiaries, such as good professional and business practices, and—for the sake of independence—not ruling out the idea of an independent body being commissioned to manage it.

4. Portugal Towards the Degovernmentalisation of Media Policies

In response to the early criticism questioning Portugal's classification under the Polarised Pluralist model, Hallin and Mancini (2012) admitted that they had relatively little information about this country available to them when conducting their study. They also wondered about the possible causes of the Portuguese case's distancing from path dependence, which in Mediterranean model countries explained the persistence of authoritarian traditions and political polarization.

The description of the Portuguese media system in their work placed it much closer to the Liberal model than, for example, that of France, but always within the Mediterranean model. Regarding state intervention, they highlighted the process of savage deregulation that the State had set in motion in the 1990s, the government model of its PSM's governance, and the existence of both indirect media subsidies (reduced tax and transport rates) and direct ones (subsidies for training and technological modernisation).

4.1. PSM Reform With Elements of the Professional Model

In 2004, Portugal unified its state public service radio and television firms into a single company, Rádio e Televisão de Portugal (RTP), within the framework of a reform and financial restructuring plan for its PSM,

which concluded with a change in its funding model in 2013 and the approval of new RTP statutes in 2014 (Lei n° 39/2014). That last legal reform, which was promoted by Pedro Passos Coelho's conservative government, changed the governance system in order "to reduce the risk of RTP's governmentalisation" (Santos Carrapatoso, 2014). To do that, it put an end to the election of the members of its board of directors and of its president by the general meeting of shareholders (several ministries and various publicly owned entities) that oversaw the media organisation. The new law provided for the creation of an Independent General Council (Conselho Geral Independente [CGI]) inspired by the former BBC Trust as the body to guide, supervise, and internally scrutinise the fulfilment of RTP's public service obligations. The CGI assumed the function of appointing members of the board of directors, including its president, the composition of which had been reduced from five to three members.

The election of the six CGI members is split between the government and the RTP Opinion Council (Conselho de Opinião)—an advisory body formed by 30 representatives of public bodies, trade unions, and social entities—that each appoint two council members, with the four elected members then putting forward the two remaining ones. Their suitability for the position must be assessed by the Portuguese Regulatory Authority for the Media (Entidade Reguladora para a Comunicação Social [ERC]). Even though the ERC's decisions are not binding, in 2014 the Portuguese government did not dare confirm the appointment of one of the council members that it had put forward but who had not received the ERC's approval. The regulator's opinion on appointments and dismissals of those in charge of RTP's media outlets and news services is binding. Such appointments and dismissals are carried out by the board of directors.

The implementation of this reform was not without controversy. In 2014, the CGI—whose president was one of the council members appointed by the government—locked horns with the board of directors—which could not be renewed until mid-2015—on the definition of the strategic project for RTP. The five content directors of the PSM asked the ERC, by letter, to clarify the CGI's powers in light of what they deemed government interference by that body in RTP's editorial decisions. The ERC considered the CGI's action a "serious violation" of the PSM's editorial policy ("ERC critica CGI," 2014). However, the CGI finally managed to force the board of directors' resignation after asking the shareholders (the State) to dismiss it, and went on to appoint a new one, whose president was a former deputy of the governing party, who had already held a high-level position in RTP. The new team dismissed all those in charge of RTP's media outlets and news content, even though one of those dismissals was rejected by the ERC. In 2021, the CGI again ignored voices calling for a renewal of the board of directors by means of a public competition, and proceeded to elect the new members of it.

In recent years, the perception of the risk of political interference in Portuguese PSM has also been associated with the change in its funding model and the instability of its income. Despite having a licence fee—established in 2003—among its sources of income, which all households pay with their electricity bills, it only amounts to an annual €36.25 per household and has not been updated since 2016. In 2022, it delivered €185 million to RTP, accounting for 80% of its total income (€230.6 million; RTP, 2022). Following the axing of the state subsidy in 2013, RTP no longer receives around €90 million. However, even though RTP's radio and television channels closed out 2022 with audience shares behind those of their private competitors (Observatório da Comunicação, 2022), 67% of the Portuguese population considers them the most reliable news sources according to *Eurobarometer Media & News* Survey 2022 (European Parliament, 2022).

4.2. A Regulator for the Entire Media Sector

The amendment of the Portuguese Constitution approved in 2004 (Lei Constitucional n° 1/2004) included, in Article 39, a provision for the creation of an independent administrative body to regulate the media, as well as a list of its basic functions. Pursuant to that mandate, Portugal formed the ERC in 2005 (Lei n° 53/2005), which replaced the High Authority for the Mass Media (Alta Autoridade para a Comunicação Social), which had been in operation since 1989, albeit with limited powers. The ERC regulates and supervises all organisations carrying out media activities under the Portuguese State's jurisdiction, regardless of their format or medium (news agencies, press, radio, television, online media, on-demand audiovisual services, etc.).

Among the ERC's many attributions are: ensuring citizens' rights, freedoms, and guarantees in the media and, in particular, promoting pluralism; preventing the concentration of media ownership; ensuring the independence of the media from political and economic powers; ensuring the fulfilment of media regulations; and scrutinising the compliance of all state advertising by all state administrations with the legal principles in this area. It coordinates its activity with: the Portuguese Competition Authority (Autoridade da Concorrência) to ensure the proper functioning of the media market; the Portuguese regulatory authority for postal and electronic communications (Autoridade Nacional de Comunicações) on aspects such as radioelectric spectrum planning; and the government to issue and resolve calls for applications for audiovisual media licences, as set out in the audiovisual media services law. To carry out its functions, the ERC has been given broad regulatory, supervisory, and sanctioning powers.

The Regulatory Board is its highest governance body (Lei n° 53/2005). It comprises a chair, a vice-chair, and three board members, who have a non-renewable term of office of five years. The Assembly of the Republic appoints four members by a 2/3rds majority of the deputies, and these four then put forward the fifth. This system has been criticised because, in practice, it leaves the door open to a proportional distribution of appointments among the various political groups of the legislative chamber, and also because it does not have a precise definition of the professional profiles or specialist knowledge needed to form part of the ERC's Regulatory Board.

4.3. Media Subsidies and State Advertising Transparency

The 2008 financial crisis and the EU's bailout of the Portuguese economy in 2011 led to significant cutbacks in public subsidies for the media sector—particularly the audiovisual media sector—in the early 2010s (Lameira & Sousa, 2017). In 2015, Decreto-Lei n.° 23/2015 established a new regime for public subsidies for the media, focusing on local and regional media, to promote the diversity of the media system. It provides for two types of subsidies: financial assistance to offset part of the cost of the postal distribution of publications; and a line of funding for technological modernisation, digitalisation, media literacy, and strategic project development. For example, the region covering the capital city awarded a total of €83.500 in subsidies in 2022 (Comissão de Coordenação e Desenvolvimento Regional de Lisboa e Vale do Tejo, 2022).

It is a decentralised system managed by five coordination and regional development committees. Within the context of the crisis caused by the Covid-19 pandemic, however, the State implemented a package of direct media subsidies in the sum of €15 million, in the form of advance procurement of state advertising space ("Apoio aos media," 2020). The Portuguese state advertising law of 2015 (Lei n° 95/2015) sets out precise

transparency obligations for this type of public investment by the State and its firms within the media system, and also for distribution across national territory. For example, 25% of the overall cost of each campaign must be channelled via local and regional media.

Supporting documentation of the cost of each campaign must be sent to the ERC within a maximum period of 15 days from the date of procurement so that it can proceed to verify and scrutinise the fulfilment of regulatory obligations. In an exercise of transparency on this matter, which is very uncommon in the European setting, the ERC produces detailed monthly and annual reports about the volume and final destination of each of these procurements, and publishes them on its website. In 2021, the Portuguese State procured 93 campaigns amounting to a total of €12.5 million—€10.5 million more than in 2020 and €9 million more than in 2019— benefiting 699 media outlets (ERC, 2022, pp. 253–263).

5. Conclusions

Within the mentioned context of political polarisation and media industry crisis, which is embedded in an unstoppable process of globalisation, we can conclude that the characterisation established by Hallin and Mancini two decades ago in terms of government intervention in Mediterranean media systems (central role of nation-states) is to a large extent still valid today.

In Spain, there continues to be considerable political interference in national and regional PSM, which are the sources of news for a large proportion of the population. Attempts at degovernmentalisation have not taken hold at all, and the parliamentary rebuff of the candidate assessments in the open competition for appointments to high-level positions in RTVE after the 2017 reform is particularly striking. At the same time, successive transparency regulations have seldom managed to ensure the availability of information on how the huge investments that the various administrations continue to make in state and regional government advertising campaigns impact the accounts of media firms. When available, a bias in favour of politically aligned media outlets has been identified. The creation of the macro-regulator in 2013, whose powers include those for audiovisual media, was certainly novel. However, such powers are limited compared to those of the regulators in other countries in the Mediterranean setting, and they are managed by council members appointed by the government.

In France, a long-established and ever-strengthened independent regulator continues to play a central role. Its power to appoint the presidents of the companies managing PSM was lost to the government in 2009, but that measure was reversed in 2013. The 2013 reform also reduced the number of ARCOM members appointed by the French Executive and strengthened the parliamentary majority needed to appoint other members. Since 2021, the Council of State and the Court of Cassation have also been involved in the election of board members. At the same time, the country continues to have a complex system of direct and indirect media subsidies, with a high budget that, despite favouring media outlets with higher audience shares, accounts for around 20% of the sector's turnover.

In Portugal, however, state intervention has diminished over the past two decades in terms of PSM funding and investment in both media subsidies and state advertising. At the same time, interesting advances towards the degovernmentalisation of the PSM governance system were observed, as evidenced by the creation—along BBC Trust lines—of the CGI, which resulted from a 2014 reform. In this regard, government powers have been

transferred to independent bodies, such as the ERC and the PSM's CGI, or regional bodies. Very interesting is the ERC's scrutinisation of appointments to high-level positions in RTP, with tangible results. Finally, the role of the ERC, which, like ARCOM, has very broad powers, is particularly striking due to the transparency it gives to the state advertising procurement process.

Thus, France and Spain are the countries where the strongest government intervention was observed (including high levels of investment in terms of PSM and private media funding), although such intervention in the Spanish case has more elements stemming from authoritarian traditions. In Spain, longer-lasting feudalism combined with the late arrival of democracy and an extraordinarily decentralised administrative structure (with governments at national, regional, provincial, and local levels) explain the manifold clientelist practices that we have noted. The growing political and social polarization that Spain has been experiencing for a decade makes it unlikely that this situation will be reversed in the short term.

Despite the occasional criticism and the polarisation also being experienced in France, the country has a strong system of checks and balances that could be clearly observed when analysing the composition and functions of the independent regulator. To understand why this is so, it is necessary to take into consideration the earlier implementation of liberal institutions as well as the tradition of professionalised administration in that country. France (the EU Member State with the highest public spending as a proportion of GDP) therefore retains elements that, in terms of government intervention, bring it closer to those countries that fit into the Democratic Corporatist model (guided by the logic of the Welfare State) as Hallin and Mancini had already anticipated in 2004.

In Portugal, lastly, a reduction in the number of mechanisms enabling clientelist practices was observed, which confirms Portugal's distancing, as has happened in the case of France, from the purest Mediterranean model to which Spain is closest. The effects of the 2008 financial crisis and the conditions placed upon the Portuguese economy's 2011 bailout by the Troika (European Commission, European Central Bank, and International Monetary Fund) are some of the factors that have driven this change, which is nevertheless rooted in a political culture that, since the overthrow of the authoritarian regime in 1974 and subsequent restoration of democracy as its form of government in 1975, has sought points of reference in advanced European democracies such as the British and French ones.

It is beyond the scope of this article to delve deeper into the identification and analysis of the causes of the different evolution of state intervention in the three analysed media systems in the 21st century. However, advancing this line of research is of unquestionable relevance and interest in order to better understand the complexity of relationships between media and political systems in Southern Europe.

Conflict of Interests

The authors declare no conflict of interests.

References

Aguado-Guadalupe, G., & Blasco-Gil, J. J. (2020). An in-depth look at media subsidies in Spain's autonomous communities in 2019. *Trípodos*, 48, 153–170.

Apoio aos media: Estado vai fazer compra antecipada de 15 milhões de euros de publicidade institucional. (2020, April 17). *TVI Notícias*. https://tvi.iol.pt/noticias/economia/17-04-2020/apoio-aos-media-estado-vai-fazer-compra-antecipada-de-15-milhoes-de-euros-de-publicidade-institucional

Balčytienė, A., & Juraitė, K. (2015). Systemic media changes and social and political polarization in Europe. In J. Trappel, J. Steemers, & B. Thomass (Eds.), *European media in crisis: Values, risks and policies* (pp. 20–42). Taylor & Francis.

Bastin, G. (2019, April 22). Les aides à la presse peuvent-elles contribuier à promouvoir le journalisme d'intérêt public? *The Conversation*. https://theconversation.com/les-aides-a-la-presse-pesiuvent-elles-contribuer-a-promouvoir-le-journalisme-dinteret-public-115510

Blumler, J. G., & Gurevitch, M. (2001). Americanization reconsidered: UK–US campaign communications comparisons across time. In W. L. Bennett & R. M. Entman (Eds.), *Mediated politics: Communication in the future of democracy* (pp. 380–406). Cambridge University Press.

Brüggemann, M., Engesser, S., Büchel, F., Humprecht, E., & Castro, L. (2014). Hallin and Mancini revisited: Four empirical types of Western media systems. *Journal of Communication, 64*(6), 1–29.

Büchel, F., Humprecht, E., Castro, L., Engesser, S., & Brüggemann, M. (2016). Building empirical typologies with QCA: Toward a classification of media systems. *The International Journal of Press/Politics, 21*(2), 209–232.

Casal Bértoa, F., & Rama, J. (2021). Polarization: What do we know and what can we do about it? *Frontiers in Political Science, 3*, Article 687695. https://doi.org/10.3389/fpos.2021.687695

Chalaby, J. (1996). Journalism as an Anglo-American invention. *European Journal of Communication, 11*(39), 303–327.

Comisión de Publicidad y Comunicación Institucional. (2023). *Informe 2022 de publicidad y comunicación institucional.* https://www.lamoncloa.gob.es/serviciosdeprensa/cpci/Documents/Informe_2022.pdf

Comissão de Coordenação e Desenvolvimento Regional de Lisboa e Vale do Tejo. (2022). *Regime de incentivos do Estado à comunicação social 2022.* https://www.ccdr-lvt.pt/wp-content/uploads/2023/06/Listagem-das-candidaturas-aprovadas-IECS-2022.pdf

Cruz Peña, J. (2023, September 1). Calviño anuncia que dará ayudas a los medios para digitalización con el gobierno en funciones. *El Confidencial.* https://www.elconfidencial.com/empresas/2023-09-01/calvino-anuncia-que-dara-ayudas-a-los-medios-para-digitalizacion-con-el-gobierno-en-funciones_3727626

Derecom. (2022). *Monográfico sobre publicidad institucional.* http://www.derecom.com/secciones/introduccion-al-numero-historico/item/476-introduccion-al-numero-33-de-www-derecom-com

Entidade Reguladora para a Comunicação Social. (2022). *Relatório de regulação 2021.* https://www.erc.pt/download.php?fd=12855&l=pt&key=bc4ddcc6d69ae573d5f148d6c3659094

ERC critica CGI da RTP por "grave violação" da autonomia editorial. (2014, December 5). *RTP Notícias.* https://www.rtp.pt/noticias/politica/erc-critica-cgi-da-rtp-por-grave-violacao-da-autonomia-editorial_n787482

European Parliament. (2022). *Media & news survey 2022.* https://europa.eu/eurobarometer/surveys/detail/2832

Fernández-Alonso, I. (2023). Political power's media capture strategies in Spain (2016–2021). *European Journal of Communication, 38*(2), 117–131.

Fernández-Alonso, I., & Espín, M. (2022). Políticas relativas a la publicidad institucional y comercial del Gobierno español (2016–2021). *Derecom, 33*, 71–85.

Fernández-Viso, A. (2017). La autoridad estatal reguladora del audiovisual: El largo camino hacia la CNMC...y su incierto futuro. In I. Fernández Alonso (Ed.), *Austeridad y clientelismo: Política audiovisual en España en el contexto mediterráneo y de la crisis financiera* (pp. 121–148). Gedisa.

Fernández-Viso, A., & Fernández-Alonso, I. (2019). Political interference in the Spanish and Catalan public service media: Attempts to reform and resistance to change (2006–2017). In E. Połońska & C. Beckett (Eds.), *Public service broadcasting and media systems in troubled European democracies* (pp. 155–176). Palgrave MacMillan.

Flew, T., & Waisbord, S. (2015). The ongoing significance of national media systems in the context of media globalization. *Media, Culture & Society, 37*(4), 620–636.

Friot, M. (2022). *Les aides à la presse continuent d'aller au plus riches*. ACRIMED. https://www.acrimed.org/Les-aides-a-la-presse-continuent-d-aller-aux-plus

Hallin, D. (2020). Comparative research, system change, and the complexity of media systems. *International Journal of Communication, 14*, 5775–5786. https://ijoc.org/index.php/ijoc/article/view/14550

Hallin, D. (2021, November 29). Typology of media systems. *The Oxford Research Encyclopedia of Politics.* https://doi.org/10.1093/acrefore/9780190228637.013.205

Hallin, D., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D., & Mancini, P. (2012). Comparing media systems: A response to critics. In F. Esser & T. Hanitzsche (Eds.), *Handbook of comparative communication research* (pp. 207–220). Routledge.

Humphreys, P. (1996). *Mass media and media policy in Western Europe*. Manchester University Press.

Humprecht, E., Castro, L., Blassnig, S., Brüggemann, M., & Engesser, S. (2022). Media systems in the digital age: An empirical comparison of 30 countries. *Journal of Communication, 72*(2), 145–164. https://doi.org/10.1093/joc/jqab054

Jannic-Cherbonnel, F. (2022, July 3). L'article a lire pour comprendre le débat sur la suppression de la redevance audiovisuel. *Franceinfo*. https://www.francetvinfo.fr/economie/medias/france-televisions/l-article-a-lire-pour-comprendre-le-debat-sur-la-suppression-de-la-redevance-audiovisuelle_5228974.html

Kantar Public. (2023). *Baromètre 2023 de la confiance des Français dans les media*. https://www.kantarpublic.com/fr/barometres/barometre-de-la-confiance-des-francais-dans-les-media/barometre-2023-de-la-confiance-des-francais-dans-les-media

Karoutchi, R. (2021). *Rapport d'information fait au nom de la commission des finances (1) sur les aides à la presse écrite*. Sénat Commission des Finances. https://www.vie-publique.fr/rapport/280466-rapport-sur-les-aides-la-presse-ecrite

Khun, R. (2019). Public service media in France. In E. Połońska & C. Beckett (Eds.), *Public service broadcasting and media systems in troubled European democracies* (pp. 69–87). Palgrave MacMillan.

Lameira, M., & Sousa, H. (2017). Portugal: Políticas de transparencia y reforma de los medios públicos. In I. Fernández Alonso (Ed.), *Austeridad y clientelismo: Política audiovisual en España en el contexto mediterráneo y de la crisis financiera* (pp. 51–68). Gedisa.

Le CSA a-t-il pistonné Delphine Ernotte pour prendre la tête de France Télévisions? (2018, February 8). *Ouest France*. https://www.ouest-france.fr/medias/france-televisions/le-csa-t-il-pistonne-delphine-ernotte-pour-prendre-la-tete-de-france-televisions-5553611

Mancini, P. (2020). Comparing media systems and the digital age. *International Journal of Communication, 14*(20), 5761–5774.

Mansell, R., & Raboy, M. (Eds.). (2014). *The handbook of global media and communication policy*. Wiley.

Mattoni, A., & Ceccobelli, D. (2018). Comparing hybrid media systems in the digital age: A theoretical framework for analysis. *European Journal of Communication, 33*(5), 540–557.

McChesney, R. W. (2001). Global media, neoliberalism, and imperialism. *Monthly Review, 52*(10), 1–19. http://monthlyreview.org/2001/03/01/global-media-neoliberalism-and-imperialism

McPhail, T. L. (2014). *Global communication: Theories, stakeholders, and trends*. Wiley.

Ministère de la Culture. (2023, September 9). *Tableaux des titres de presse aidés*. https://www.culture.gouv.fr/Thematiques/Presse-ecrite/Tableaux-des-titres-de-presse-aides2

Murdock, G., & Golding, P. (1999). Common markets: Corporate ambitions and communication trends in the UK and Europe. *The Journal of Media Economics, 12*(2), 117–132.

Observatório da Comunicação. (2022). *Anuário da comunicação 2022*. https://obercom.pt/anuario-da-comunicacao-2022

Papathanassopoulos, S., Giannouli, I., & Archontaki, I. (2023). *The media systems in Europe: Continuities and discontinuities*. Springer.

Plenel, E. (2023, September 11). Le scandale persistant des aides à la presse. *Mediapart*. https://blogs.mediapart.fr/edwy-plenel/blog/110923/le-scandale-persistant-des-aides-la-presse

Rádio e Televisão de Portugal. (2022). *Relatório e contas 2022*. https://cdn-images.rtp.pt/mcm/pdf/cf4/cf4078888126f6283455c2cc061935ba1.pdf

Santos Carrapatoso, M. (2014, December 2). Conselho geral independente da RTP: O que é isso? *Observador*. https://observador.pt/2014/12/02/conselho-geral-independente-da-rtp-o-que-e-isso

Schulze, H., Mauk, M., & Linde, J. (2020). How populism and polarization affect Europe's liberal democracies. *Politics and Governance*, *8*(3), 1–5. https://doi.org/10.17645/pag.v8i3.3460

Trappel, J., Steemers, J., & Thomass, B. (Eds.). (2015). *European media in crisis: Values, risks and policies*. Taylor & Francis.

Zarka, J. C. (2022, October 4). La suppression de la redevande et la réforme du financement de l'audiovisuel public. *Actu-Juridique.fr*. https://www.actu-juridique.fr/fiscalite/fiscal-finances/la-suppression-de-la-redevance-et-la-reforme-du-financement-de-laudiovisuel-public

About the Authors

Ana Fernández-Viso (PhD) is a lecturer in Structure of Communication at the Autonomous University of Barcelona (UAB) and a researcher at the UAB Daniel Jones Research Group in Communication Structure and Policies. Her fields of expertise are media policies (mainly public service media, independent audiovisual regulatory bodies, and state advertising), the analysis of media systems, and the articulation between the processes of both communication and social change. She has published her research in indexed scientific journals and leading publishing houses.

Isabel Fernández-Alonso (PhD) is a senior lecturer in Communications Law at the Autonomous University of Barcelona (UAB) and the head of the UAB Daniel Jones Research Group in Communication Structure and Policies. Her research focuses on media policy, law, and ethics, public service media, press subsidies and state advertising, and has been frequently developed into proposals for political action. She has worked as a researcher and lecturer at four private universities in Spain and at the Free University of Brussels.

ARTICLE

Comparing Media Systems Through the Lens of Neoliberal Hegemony: Evidence From the US and Flanders

Nils Wandels [1], **Jelle Mast** [1], **and Hilde Van den Bulck** [2]

[1] Brussels Institute for Journalism Studies, Vrije Universiteit Brussel, Belgium
[2] Department of Communication, Drexel University, USA

Correspondence: Nils Wandels (nils.wandels@vub.be)

Abstract

This article argues that increased insight into the global characteristics of the post-Cold War era provides journalism scholars with alternative interpretative lenses to engage in comparative analysis of media system development in the West. We adopt the sociohistorical approach pursued by Hallin and Mancini (2004) in their seminal work *Comparing Media Systems* to embark on an examination of the dialectic relationship between global neoliberal hegemony, the transformation of media markets, and the emergence of a new journalistic consciousness (doxa). This examination concerns a comparative analysis of developments in a selection of Flemish and American legacy newspapers between 1980 and today, based on a data set consisting of 36 in-depth semi-structured interviews with high agency individuals (executive editors, managing editors, senior journalists, and publishers). The goal of the article is to establish the lens of global neoliberal hegemony as a viable alternative framework to the regional lens of the media systems typology for engaging in comparative analysis of developments in media structures and journalistic practice.

1. Introduction

Historians increasingly conceptualize the three decades since the end of the Cold War as a separate era (Holslag, 2021; Reid-Henry, 2020; Ther, 2016) defined by a.o. American unipolarity (Mearsheimer, 2019), globalism (Slobodian, 2018), interventionism (Parmar, 2009), and neoliberal ideological hegemony (Harvey,

2005; McChesney, 2001). The era is characterized by a strong transatlantic bond between the US and Europe, embedded in supranational frameworks such as the NATO military alliance and the Transatlantic Economic Council. Internal dynamics in the West (e.g., Brexit, the election of Donald Trump) and global trends (e.g., the expansion of BRICS and the Shanghai Cooperation Organisation, the proliferation of international conflict) suggest that this era has come to an end, and a geopolitical shift is taking place.

Once an era is recognized as such, it constitutes a lens that creates the historical distance necessary to interpret longitudinal developments in a new light. In journalism studies, this can contribute to revitalizing the sociohistorical approach that conceptualizes journalism as an institution and a cultural expression embedded within a larger macro-societal environment. As Hallin and Mancini (2004, p. 8) put it, "one cannot understand news media without understanding the nature of the state, the system of political parties, the pattern of relations between economic and political interests, and the development of civil society among other elements of social structure."

Especially in comparative journalism studies, this revitalization can push the field forward. For the past two decades, the media systems typology developed by Hallin and Mancini (2004) has been the gold standard in comparative research. The model has been expanded upon (Albæk et al., 2014; Dobek-Ostrowska, 2019; Herrero et al., 2017), it has served as a basis for further empirical inquiry (Brüggeman et al., 2014; Kaiser & Kleinen-von Königslöw, 2019), and its limits have been challenged and tested (Umbricht & Esser, 2014). In contrast, significantly less attention was paid to the reproduction of the system-based approach that is laid out in *Comparing Media Systems* (2004), with its emphasis on the relationship between media and society at large. As Hallin and Mancini (2016, pp. 168–169) themselves put it:

> We worry that this sociological-historical approach to scholarship, which understands social formations holistically as historically embedded patterns of relationship, is for the most part poorly developed in our field, and that as a result advances in measurement outstrip the quality of theoretical analysis.

The ritualistic reproduction of classifications or categories always bears the danger of overlooking elements that these categories were not designed to capture. We therefore question whether Hallin and Mancini's media systems typology is the optimal framework to understand developments that have taken place during the post-Cold War era. Are attempts to explain recent developments in journalism in terms of convergence or divergence between a liberal, corporatist, and polarized model not overcomplicating or obfuscating the nature of a global media system? Shouldn't we rather, in the spirit of *Comparing Media Systems* (2004), re-examine newly-wrought relations between the era's macro conditions and journalism? Can alternative perspectives be considered in order to recapture the essence of Hallin and Mancini's contributions to the field?

In this article, we adopt the lens of one of the post-Cold War era's key characteristics, neoliberal hegemony, to interpret media market developments and the establishment of a collective journalistic consciousness grafted onto the neoliberal mode of thought on both sides of the Atlantic. Our goal is to demonstrate the interpretative potential of adopting global neoliberalism as the primary lens to comparatively examine overarching similarities and regional differences in media system development across the boundaries set by the media systems typology. We will first define the main characteristics of global neoliberalism as a basis for our interpretative framework. Next, we briefly discuss regional differences in the emergence of neoliberalism as the hegemonic mode of thought. Finally, we present the findings from a qualitative

comparative analysis of two case studies (Flanders and the US) through the lens of global neoliberalism. This article constitutes a step towards building a model for comparative analysis that revaluates the examination of sociohistorical context as a precondition for understanding developments both on the global and the local level. We acknowledge that this study is exploratory in nature and that neoliberal hegemony is only one of many potential supranational lenses that can be adopted to examine developments in journalism during the post-Cold War era.

2. Neoliberal Hegemony and the Journalistic Field

As recent as 2008, Hallin pointed out the need for a better understanding of neoliberalism and its impact on journalism (Hallin, 2008). In journalism studies, the term is primarily invoked for its explanatory power when discussing the impact of commercialization on the structure of media markets (Berry, 2019; McManus, 2009) or in the context of the propagation of hegemonic frames of thought among global audiences (Phelan, 2018). Both these applications channel political-economy perspectives that explore the impact of media ownership concentration and economies of scale on journalistic autonomy (McChesney, 2001; Schiller, 1989) and the homogenizing role of mass media in the shaping of public opinion (Herman & Chomsky, 1988). However, from a comparative perspective, neoliberalism is rarely considered the primary analytical lens. Studies belonging to the Nordic tradition (Jakobsson et al., 2021; Ohlsson, 2015) deal with the impact of neoliberalism within national or regional boundaries, e.g., in the context of an emerging neoliberal media welfare state. However, these ethno- or nation-centric approaches potentially overcomplicate media system development by attributing regional particularity to international trends, arguably overlooking one of global neoliberalism's primary tenets: the increased authority of supranational regulatory bodies (cf. discussion later on). Though local or regional diversity obviously should not be dismissed, we present an argument for incorporating these differences into the analysis only after the lens of global neoliberalism has been applied. This "top-down" approach aligns with the view of McChesney (2001, pp. 2–3), who states that, in order to "grasp media today and in the future, one must start with understanding the global system and then factor in differences at the national and local levels."

Neoliberalism's impact on journalism appears to have been conceptualized by journalism scholars as an external threat due to the fact that it has changed market structures and circumstances, primarily within the boundaries of national contexts. The hidden relationship between neoliberal ideological hegemony and the emergence of a journalistic consciousness that is grafted onto this "common-sense" way of thinking via processes of socialization remains largely unexplored. Scholars have repeatedly demonstrated the emergence of a "commercial logic" or a rationale of "profit maximization" (McChesney, 2001; McManus, 2009), though these realities are rarely interpreted in terms of the transformation of a neoliberal hegemonic "common sense" into a journalistic professional "common sense." Similarly, the social processes that drive such a transformation are rarely examined because most studies are inclined to explain changes in terms of external pressures (technological, economic, and professional boundaries; Nielsen, 2016). Efforts towards understanding these processes of socialization, e.g., via the impact of media management (Breed, 1955) on the collective adoption of attitudes or myths (e.g., the myths of individualism, neutrality, and media pluralism; Schiller, 1973), are limited.

Our study adds to the discussion of neoliberalism and journalism by including both neoliberalism's impact on transforming the conditions wherein journalism is produced and its socializing properties as a dominant

mode of thought. Front and center are the dialectics between neoliberalism, the structure of media markets, and journalistic consciousness. To conceptualize these dialectic relations, we adopt the theoretical framework of field theory developed by Pierre Bourdieu. As a highly heteronomous field where agents struggle "for the power to impose the dominant vision of the field" (Bourdieu, 2005, p. 36), the field of journalism experiences significant exposure to developments and logics that are external to it. Its doxa, i.e., the implicit principles shared by agents belonging to the field that guide action within the field, often reflects the categories and concepts "belonging to the encompassing social world, slightly adjusted [and] reordered" (Bourdieu, 2005, p. 37). In other words, a process of osmosis occurs between field-specific journalistic doxa and the dominant logics that dictate the macrocosm wherein journalists are socialized. Therefore, the emergence of a field-specific doxa grafted onto neoliberal hegemonic thought is grounded in Bourdieu's acknowledgment that primary and secondary socialization processes within a time-specific macro context shape individual habitus. It follows that habitus functions as a vessel for importing dominant modes of thought that characterize this time-specific macro context within the boundaries of the field of journalism. The eventual incorporation of these attitudes into journalistic doxa is, of course, contingent on the outcome of struggles for field positions between individual agents. However, due to the heteronomous nature of the journalistic field, it is to be expected that agents whose habitus is in tune with dominant modes of thought in society at large have a clear advantage in these struggles. Furthermore, we cannot overlook the impact of structural realities of overarching inter-field power balances (e.g., the structure of media markets and the hierarchical relationships within news organizations) on the transformation of journalistic doxa. This whole process of macro-societal socialization, the struggle for field positions, and the reproduction or transformation of doxa is a cycle with an explicitly generational aspect. Bourdieu conceptualized this in terms of the generational renewal of the field, characterized by the struggle between the establishment and the avant-garde.

To summarize it in Bourdieu's (1998, p. 39) terms, "journalism is a microcosm with its own laws, defined both by its position in the world at large and by the attractions and repulsions to which it is subject from other such microcosms." In this way, he bridges the gap between the macro- and microcosm, between neoliberal hegemony on the macro level, and the dominant patterns of thought guiding the actions of individual journalists on the micro level (i.e., doxa).

3. Defining Neoliberalism

As we set out to examine how neoliberal hegemony has shaped media markets and journalistic doxa, we must first define neoliberalism. This is a challenging venture, as neoliberal theory and practice are not always aligned, and the term has a problematic history in the way it has been applied in academia. Mirkowski and Plehwe (2009, p. 20) state that "hegemonial neoliberalism must be conceived of in plural terms as a political philosophy and a political practice." Ther (2016, pp. 11–12) adds that it is, in the first place, a "rhetorical toolkit to legitimize radical reforms." Both imply its potential to adapt to national or regional contextual differences and, as a result, take different forms. Harvey (2005, p. 2) offers a working definition that can serve as a basis for further elaboration: "neoliberalism is…a theory of political economic practices that proposes that human well-being can best be advanced by liberating individual entrepreneurial freedoms and skills within an institutional framework characterized by strong private property rights, free markets, and free trade." In other words, neoliberalism aims to reshape modes and relations of production via economic policy (i.e., the economic base). It aims to do this in light of a perceived common good (i.e., the ideological

rationale). As Ther (2016, p. 20) puts it, neoliberalism as an ideology is built on a belief in a "dual *telos* of planned economy to market economy," which would then facilitate the transition from "dictatorship to democracy."

Neoliberal economic policy primarily emphasizes private ownership, the rule of competitive markets, and the free flow of capital. These founding principles are practiced via policy that emphasizes deregulation, privatization, and the general withdrawal of the state from many areas of social provision (Friedman, 1951). Despite its advocacy for a minimal role of the state, neoliberal thought considers the state responsible for facilitating "the conditions for profitable capital accumulation on the part of both domestic and foreign capital" (Harvey, 2005, p. 7). As such, the neoliberal state is required to create and safeguard competition in markets in a bid to "bring all human action into the domain of the market" (Harvey, 2005, p. 3) and let profits "rule wherever they can be generated" (McChesney, 2001, p. 13). Furthermore, the state's role is to lift barriers to international trade and protect private capital. The latter implies, in the first place, the pursuit of price stability and the restriction of inflation, primarily through austere monetary policies (Williamson, 2003). This is reflected in a tendency to increase the executive power of institutions such as central banks, which remain beyond the grasp of democratic accountability. This emphasis on expanding legal accountability over democratic accountability is based on the idea that "world law trumps world state" (Slobodian, 2018). Supranational institutions provide a strong legal framework in order to preserve free trade and the free flow of capital on a global scale. Private ownership is, as such, protected from the "overreach of states" and the inherent threat that democratic rule poses to the functioning of the global market system (Nicol, 2010; Slobodian, 2018). Consider in this regard the establishment of the WTO in 1995 as an "apparatus of juridical power to encase markets beyond democratic accountability" (Slobodian, 2018, p. 266). The neoliberal turn within international bodies such as the EU, the World Bank, and the IMF can also be considered in this light. As such, this supranational legal framework creates a global environment of competition, both within markets and between states (Slobodian, 2018).

The core belief that underpins neoliberal thought is that markets and consumerism are the necessary paths to achieving individual freedom (Friedman, 1962; Hayek, 1960; Ther, 2016). The organization of social life via markets is considered an antidote to the coercive forces of the state since individuals are considered free to choose whether they engage with each other in the marketplace (Friedman, 1962). The project of neoliberalism is, therefore, aimed at "finding the right state and the right law to serve the market order" (Slobodian, 2018, p. 87). Embedded in this idea is an inclination towards moral relativism conceptualized by proponents of neoliberalism as an apolitical worldview. On the other hand, critics argue that neoliberal logic leads to a profound depoliticization (McChesney, 2001). In any case, both agree that neoliberal thought promotes some degree of detachment of markets from political life. Consumerism and individualism are elevated to the very essence of freedom, whereas collectivism is dismissed. As neoliberal political reformer Margaret Thatcher put it, "there is no such thing as society, only individual men and women" (Harvey, 2005, p. 82). In neoliberal thought, these men and women are reduced to the "*homo economicus*" (Ther, 2016), the underlying idea being that rational engagement with each other in the marketplace will produce both prosperity and freedom. Freedom is primarily defined in terms of the freedom of enterprise and the freedom to engage in markets; prosperity, as individual capital accumulation and the acquisition and consumption of commodities ("consumerism trumps state"; Friedman, 1962; Harvey, 2005; Slobodian, 2018). Applied to the field of journalism, it appears that neoliberalism is ideologically conducive to the transformation of news into a salable commodity that can be detached from its political functions and is not necessarily available to all

(McChesney, 2001; Schiller, 1989). Similarly, it appears to be fertile ideological soil for the propagation of what Schiller (1973) called the myths of "individual freedom" and "neutrality." This collection of intertwined ideas (depoliticization, competition in markets, consumerism, i.e., transforming the citizen into a consumer, individual freedom, and supranationalism) form the core of neoliberal thought. Aside from how neoliberal hegemony has transformed media markets, we will be looking at how these ideas are transformed and incorporated into journalistic doxa.

As a final note in this section, we re-emphasize the aforementioned gap between neoliberal theory and practice. If anything, one of global neoliberalism's defining tenets appears to be its compatibility with and adaptability to other socioeconomic and ideological frameworks, with some even appearing to be antithetical. For example, despite neoconservatism's opposition to perceived excesses of individual freedom and its emphasis on a strict moral framework (Guelke, 2005), it appears to be highly compatible with the neoliberal mode of production. The same can arguably be said about corporate expressions of progressive identity politics. On the other hand, despite the Keynesian underpinnings of Western interventionism, it has proven to be an instrumental vehicle for the dissemination of neoliberal values across the globe.

4. Towards Neoliberal Hegemony on Both Sides of the Atlantic

The first decade(s) after the Cold War can be defined as neoliberalism's triumph, as evidenced by the work of, e.g., Francis Fukuyama. During this time, its political and ideological tenets became dominant in state institutions, financial institutions, education, and mass media. As such, "neoliberalism has...become hegemonic as a mode of discourse. It has pervasive effects on ways of thought to the point where it has become incorporated into the common-sense way many of us interpret, live in, and understand the world" (Harvey, 2005, p. 3). Despite the global scope of the neoliberal project, we must turn our attention to regional differences in how neoliberalism as "common sense" manifested itself. Any longitudinal comparative analysis of media through the primary lens of neoliberalism is required to take into account the history of how these "spatial configurations" (Ther, 2016) came about.

The neoliberal turn in the West occurred in the context of a wider crisis of embedded liberalism (Holslag, 2021; Slobodian, 2018; Ther, 2016). Neoliberal ideology only entered the mainstream at a time when the social contract between labor and capital came under considerable pressure during the mid-1970s (Harvey, 2005; Slobodian, 2018). The first political flagbearers of neoliberal policy in the West came to power simultaneously around 1980 on both sides of the Atlantic. Reaganomics and Thatcherism prioritized deregulation and strict anti-inflation policy and professed a mindset of free markets as a vehicle for maximizing individual freedom with "economy as the method" (Harvey, 2005). Nonetheless, there were considerable distinctions between the methods both countries pursued to amass popular support for these reforms. In the US, reform was facilitated by a combination of election commodification via new campaign financing laws and the mobilization of a moral conservative base. In the UK, where the welfare state was more developed, traditional class awareness embedded in institutions (such as labor unions) was gradually deconstructed both by elite bodies (universities, financial institutions, think tanks) and late 1960s revolutionaries calling for more individual freedoms.

Policies enacted in the Anglo-Saxon world eventually put pressure on European welfare states as well. Further integration of European economies into supranational European bodies played an important role in this process (Varoufakis, 2017). Increasing competitiveness through budgetary restraint, inflation control,

and market reform were top priorities for political leaders. In France, Mitterrand abandoned his Keynesian inclinations in order to ease inflation and prevent the devaluation of the franc; in Germany, Helmut Kohl declared a new economic policy, "away from more state to more market; away from collective burdens to more personal achievements; away from entrenched structures to more flexibility, individual initiative and competitiveness" (Ther, 2016, p. 40); in Belgium, the Martens government attempted to increase competitiveness, among other things, by devaluation of their coinage, under IMF pressure (Michielsen, n.d.). However, continental étatism initially prevented a swift neoliberal turn as had occurred in the US and the UK. Budgetary austerity became more commonplace after the Treaty of Maastricht in 1992, which facilitated neoliberal reform (Burkitt & Baimbridge, 1994). In Belgium, media owners rallied behind these reforms, openly advocating for privatization, the cutting of state budgets, and increased executive power for central banks (Leysen, 1993).

After the fall of the Berlin Wall, neoliberal policymakers were emboldened by an intellectual climate that unilaterally proclaimed the definitive victory of capitalism (Fukuyama, 1989). Throughout the 1990s, neoliberal reform swept across the nations of the former Soviet Union. As Ther (2016, p. 10) writes: "In the early nineties, Western experts assumed that the development of market economy and democracy were interconnected and interdependent." Furthermore, the sovereignty of European nation-states was increasingly transferred to supranational bodies such as the WTO and the EU (Burkitt & Baimbridge, 1994; Slobodian, 2018). European nations' historically strong welfare state tradition received a critical blow in the aftermath of the 2008 mortgage crisis and the sovereign debt crisis that followed it (Varoufakis, 2017). Southern Europe, in particular, became subject to the severe austerity that had previously been imposed to transform Eastern European states (Ther, 2016).

These varying origin stories of neoliberal hegemony across countries and media systems reflect how spatial variations can be expected when adopting the neoliberal lens. This will show up during our discussion of the US and Flanders cases.

5. Connecting Neoliberal Hegemony, Media Markets, and Journalistic Attitudes: An Oral History Approach

In what follows, we will present a comparative analysis aimed at examining how the neoliberal turn has affected journalism on both sides of the Atlantic, both in terms of media market transformation and the emergence of neoliberal journalistic doxa. This is a qualitative analysis that is exploratory in nature, meaning that its scope is limited. It is based on an examination of two case studies that are clearly demarcated in space and time. We analyzed historical developments that have occurred in a limited selection of legacy newspapers in the US (*Philadelphia Inquirer* [P.I.]) and Flanders (*De Standaard*, *De Morgen*, *Het Nieuwsblad*, and *Het Laatste Nieuws*) between 1980 and 2023. Both countries are traditionally categorized as exponents of different media systems (the "liberal" and the "democratic corporatist" model, respectively), though we will not factor in these differences a priori. As our analysis will show, regional differences expose themselves anyway. Given the goal of this article, we will interpret these differences in light of the uneven development of neoliberal hegemony in the US and continental Europe. Furthermore, our selected timeframe enables us to track longitudinal developments within the field of journalism in relation to the overall development of neoliberalism.

Our primary data for analysis were gathered via in-depth semi-structured interviews with high agency individuals (i.e., executive editors, managing editors, senior journalists, and publishers) who were active in the newsroom of either one of the aforementioned newspapers over the past four decades. The perspective of high agency individuals is particularly valuable due to the often boundary-spanning nature of the organizational role of these individuals (being involved both in editorial matters and matters of management; Gans, 1979) and their impact on the socialization of attitudes within the newsroom (Breed, 1955; Schiller, 1973). Nonetheless, their perspective remains remarkably unexplored in journalism studies. Interviews were conducted in a sphere of confidentiality and centered around a life/career overview approach. Specific attention was given to interviewees' background (primary socialization), professional education (secondary socialization), the organizational conditions of their employment, their primary tasks and responsibilities in the newsroom, their journalistic norms and values, and external factors influencing the newsroom. If applicable, the reasons for leaving the field of journalism were discussed. In total, we conducted 12 interviews with 10 American interviewees and 24 interviews with 22 Flemish interviewees (see Supplementary File). Interviews ranged anywhere from one hour to over three hours. Collected data were triangulated with each other and other available source material, such as public records, company data, interviews with third parties, (auto-)biographies, and secondary literature on the Flemish and the American news media landscape (De Bens & Raeymaeckers, 2010; de Ridder, 2001; Gorman & McLean, 2003; Halberstam, 1975; Leysen, 1993; MacPherson, 2006; Ruys, 1999; Underwood, 1995). Data were categorized using NVIVO software and subsequently analyzed via thematic content analysis. We adopted a diachronic perspective in order to lay bare developments in market circumstances and attitudes over time.

Our approach is qualitative in nature and is grounded in the oral history tradition, which "draws on memory…to gain a more complete or different understanding of a past experienced both individually and collectively" (Bornat, 2003, p. 35). The interview format allows us to tie together the material realities of news work, which are contingent on organizational structures and the overall structure of the market, and the dominant views, attitudes, and judgments about these realities journalists hold. By diving into the personal and professional history of the interviewee, we also gain insight into the experiences that have shaped these attitudes and how these have contributed to the construction of a habitus (Benson & Neveu, 2005). Furthermore, discourse utilized by interviewees reveals implicit categories of classification and judgment, which constitutes a breadcrumb trail toward uncovering the hidden structural attitudes and modes of thinking (doxa) that organize the field as a whole. As Bourdieu (2005, p. 38) puts it, it is the task of the sociologist to transform "[implicit schemes of classification] into explicit categories, into discourse." Semi-structured interviews, where the interviewee is allowed a certain amount of agency in setting out the perimeters of the interview, encourage this transformation of implicit categories into explicit discourse. We, therefore, argue that it is the most appropriate research method for uncovering the subtleties of journalistic doxa.

6. The Neoliberal Lens in Practice: A Comparative Analysis of US and Flemish News Media

The neoliberal turn instigated a profound transformation of media markets on both sides of the Atlantic. At the end of the 1970s, the P.I. was a highly profitable newspaper. Newsroom mechanization allowed savings on technical personnel, and considerable investments were made in newsroom expansion, which eventually resulted in the accumulation of considerable symbolic capital (the newspaper won multiple

Pulitzer prizes during this era). American newspapers, in general, held a strong monopoly on the advertising market, which accounted for the bulk of newspaper revenues. Classified ad sections especially impacted newspaper profitability in the years prior to the internet boom. In Flanders, the situation was somewhat different at the advent of the neoliberal turn. Newspaper markets were more politicized due to the pillarized societal context (Wandels et al., 2023). This meant that individual newspapers were more limited in their advertising reach than the American press. Rather, the profitability of Flemish newspapers depended on a loyal reader base that shared the editorial views of the newsrooms (Christian-democratic, socialist, liberal). Despite the detrimental effects of the 1970s inflation crisis on the newspaper industry, which led to the bankruptcy of one of Flanders' major newspapers, circulation remained stable (De Bens & Raeymaeckers, 2010).

Attitudes concerning profitability among newspaper owners and executives in the US noticeably shifted during the 1980s. At the P.I., executives adopted the logic of shareholder value maximization, which increased the pressure on the newsroom to reduce expenditures, primarily on journalistic personnel. P.I. was part of the Knight-Ridder newspaper company, which had publicly traded shares since the mid-1970s. Despite being beholden to financial markets, the Knight-Ridder corporation had managed its newspapers as if they were a private company. According to interviewees, this attitude changed in the mid-1980s. By this time, pressures from competitors such as Gannett—who leveraged economies of scale and weak labor protection—increased, causing Knight-Ridder to change course:

> [Gannett] managed to get over 30% operating profit, not just on a few select papers, but everywhere. And their stock price went up. Other newspaper companies, including Knight-Ridder, tried to match what Gannett was doing. The problem was that Gannett bought smaller papers where you had no unions. And they could cut costs and reduce staff in ways that were impossible in unionized news organizations [like ours]. (Quote 1, US)

The competitive atmosphere in the newspaper business at the time was arguably instigated by the large influx of MBA graduates in newspaper companies (Underwood, 1995), who propagated the idea that "there [is] no mission for a company other than shareholder value" (interview excerpt). These voices represented a logic that was indirectly imposed on the field of journalism within the microcosm of the news organization. Moreover, despite operational profit margins approaching (and regularly surpassing) the 20% mark throughout the 1980s and 1990s, effectively making the P.I. a "cash cow" for the Knight-Ridder company, executive management implemented budgetary austerity. In practice, this meant further staff reductions and sometimes cost-cutting measures that were antithetical to journalistic doxa at the time:

> As the internet eroded revenues, the only way the business side could maintain these profits was cutting the newsroom, cutting everything. [For example, they cut] circulation. On purpose. Because by printing fewer papers we could save money on newsprint, on ink, on truck drivers....I thought it was insane. (Quote 2, US)

This rapid transition towards an aggressive strategy of shareholder value maximization was initially deterred in Flanders by the fact that most newspapers were still privately owned. Nonetheless, the neoliberal turn did profoundly affect the market. First of all, in a more politicized media landscape such as Flanders, the impact of the Soviet Union's implosion and the subsequent victory of free market capitalism has to be taken

into account. Neoliberal political hegemony in the 1990s accelerated the "de-pillarizing" tendencies that were already present in Flanders at the time. This was reflected in the legacy news media landscape, as the legacy print press had to adapt to an emerging "de-pillarized" market reality of depoliticized consumers (Wandels et al., 2023). Some interviewees internalized this reality as an existential threat to the newspaper industry: "[If we don't change the content of the newspaper], we are going to die out, together with our audience" (Quote 3, Flanders).

Second, notwithstanding an absence of the direct pressures exuded by financial markets via stock ownership, similar pressures were exercised on the Flemish media market in different forms. During the late 1980s, legislation was passed that opened up the television broadcasting market in Belgium (which had remained the exclusive domain of the public broadcasting service up until 1989) for commercial enterprise. This put pressure on advertising revenues that had traditionally been absorbed primarily by print news media (De Bens & Raeymaeckers, 2010). As a reaction to a tightening advertising market, newspaper executives and owners sought to secure profitability by pursuing economies of scale via corporate mergers and takeovers. This increased the total circulation of the newspaper group, improved its business proposition on the advertising market, and produced budgetary benefits through newsroom synergies. In this increasingly competitive environment, marketing agencies became increasingly involved in newsrooms, educating Flemish newsroom executives on how to secure audiences:

> When I saw these marketing reports…I read disconcerting sentences, such as: "the market decides how and about what [the news organization] reports," "news beats should be evaluated based on their return on investment," and "from now on, the reader is chief editor of the newspaper." (de Ridder, 2001, p. 147)

Interestingly enough, the pressure that Gannett put on Knight-Ridder was even felt on the other side of the Atlantic:

> In America, *USA Today* had started incorporating color pictures and infographics. [In response, our executives] pushed the idea that the newspaper needed to change its outlook. It needed to include color pictures and more infographics, or else the newspaper was inadequate. (Quote 4, Flanders)

Changes in the executive hierarchy of the newspapers under examination mirror the mentality shift towards shareholder value maximization. At the P.I., the chief editor, who had traditionally operated side by side of a general manager, was required to report to a newly installed publisher on newspaper performance by the late 1980s. Before, the chief editor reported directly to executives at Knight-Ridder's headquarters. Negotiated newspaper budgets were abandoned for non-negotiable financial targets dictated by HQ: "Miami [i.e., the location of Knight-Ridder H.Q.] no longer asked for plans. They just told you what your budget was going to be and how much profit they wanted" (interview excerpt). This put considerable pressure on the "wall" between journalism and business. At *The Daily News*, a sister newspaper of the P.I. owned by Knight-Ridder, the newsroom actively pursued closer collaboration with marketing and sales departments "part[ly] out of desperation" (interview excerpt). Similar organizational restructurings took place at Flemish newspapers. Throughout the 1990s, there were experiments with different hierarchical structures and organizational models, each meant to curtail the power of the newsroom and advance the company's business interests. The barriers that separated journalism and business eventually came down

during this period, paving the way for more interdepartmental collaboration. Our data show that all these developments propagated increased bureaucratic financial control over the news production process (Wandels et al., 2022).

By the mid-2000s, the advertising model that had supported the American newspaper business deteriorated due to competitive challenges posed by the internet. Ever since, the business has been in a prolonged state of decline. The same is true at the P.I. Some interviewees argue that the fixation on the maximization of shareholder value (i.e., a core tenet of neoliberal thought) during the years when profit margins soared (1970s–1990s) had contributed to this collapse, as investments in research and development of new business models had been sacrificed for short term profitability. Between the late 1980s and the early 2000s, multiple executive editors at P.I.—under whose supervision the newspaper had acquired national acclaim—resigned as they had become frustrated with the budgetary austerity exercised by executives. One of them was fired for resisting further cutbacks. Eventually, Knight-Ridder sold the company in 2005 at peak market value, after which the newspaper became subject to multiple ownership changes and organizational restructurings, which eventually decimated the newsroom. In Flanders, both circulation and advertising revenues have remained more stable throughout the 2000s (De Bens & Raeymaeckers, 2010). Nonetheless, increased competitive pressures have driven the media landscape toward corporate consolidation. In a tightening market, newspapers sought to survive and ensure profitability by merging, creating synergies, and cutting costs. Newspapers that had historically represented opposite perspectives on the ideological spectrum (e.g., liberalism and socialism) were incorporated into the same ownership structure. As a result, what had been a media landscape traditionally characterized by its external pluralism today is embedded in a more homogeneous ideological framework. Two major international media conglomerates now own most of the newspaper market in the Low Countries. P.I., on the other hand, is now owned by the Lenfest Foundation. This non-profit organization has rid the Inquirer of the profitability requirements demanded by Wall Street, though the mindset that was instilled in newsrooms during decades of budget cuts and financial austerity lingers on. The evolution towards a vastly different media market under the impulse of neoliberal policy and ways of thinking from the early 1980s onwards has left permanent marks on the mindset of newsrooms both in the US and Flanders: on the way they perceive audiences, make editorial decisions, and conceive of their role.

Newsroom executives such as chief editors are navigating a multitude of business models that are not always compatible with traditional journalistic interests. They are socialized within a context that encourages them to pursue active collaboration with advertising and marketing departments that provide extensive audience data upon which to base their editorial decision-making. Advertising income from newsletters, for example, requires editorial volume, which is increasingly difficult to produce due to the decimation of newsroom staff. At P.I., a "breaking news desk" was set up to achieve this marketing-driven goal. Simultaneously, the demand for high quality journalism that is more time intensive requires the newsroom to adopt a subscription model. This dual model effectively keeps high quality journalism away from the public via the paywall while simultaneously flooding the market with lower-quality content. It confirms the idea of re-imagining news as a salable consumer good available to those willing to pay (Schiller, 1989). This tension between a newsroom's autonomy to pursue the stories they consider worth telling and limitations to the availability of these stories set by business considerations delegitimizes the public service role of the press that is still actively upheld in discourse. Additional tension is added by the increasingly sophisticated insight that audience analytics offer to newspaper executives: "It's really important information because it tells you

for the first time what people are reading and what they're interested in. And it would be foolish for you not to look at the data, learn, and help shape coverage" (Quote 5, US).

This demonstrates how consumer-centric logic is internalized in the higher echelons of the newsroom. Set against attitudes held by chief editors merely four decades earlier, it exposes a shift within the collective consciousness of newsrooms related to audience and role perceptions. News needs to be exciting and engaging, which influences editorial choices: "I think even if they had better resources, a lot of newspapers would neglect state government, saying it's boring" (Quote 6, US).

In Flanders, a similar overall awareness of consumer value and the need for a collaborative attitude towards the company's business arm is prevalent in newsrooms today. When contemplating new editorial initiatives, chief editors take their expected market value into consideration:

> If I launch an idea for a new journalistic product [e.g., a magazine or a podcast], I am mindful of the targets of our sales director. I want him to think: "Yes! Our brand revenue needs to grow another 3% this year, and this can help me achieve that." (Quote 7, Flanders)

Audience metrics have helped American and Flanders newsrooms to understand their readers in their capacity as consumers, and they put direct or indirect pressure on newsrooms to give readers what the analytics suggest they want. News stories are, as such, transformed into commodities in a marketplace of attention that is either validated via popular attention (clicks) or conversion rates (subscriptions). It suggests that, in the context of a collaborative environment between the business and journalism arms of the news organization driven by audience metrics, "public service" has increasingly come to mean "customer satisfaction." Interviewees are quick to point out that these metrics do not drive news production while simultaneously admitting that they form the basis for goals and targets used by executives to evaluate the newsroom's performance. This demonstrates the internal conflict at the heart of journalistic consciousness today:

> [Key performance indicators that apply to me] have become a lot more precise. They concern average approval ratings of [our newspaper] by our readers, the number of users that have downloaded our online news app, the number of subscribers that are logged on our website, the average amount of clicks per reader....These are all part of my annual targets. (Quote 8, Flanders)

> [Last week] our daily production was below the target. So then we have conversations....We encourage people...to manage their staff to increase production....We don't say "do stupid stories," right? There's an understanding there. (Quote 9, US)

The language that interviewees use conjures up the idea of the production of any other commodity. However, in the quest for increased productivity in order to hit specific targets, some of the primary democratizing functions of the press have come under considerable pressure. As news content is driven by the mechanisms of the market, we have seen the emergence of news deserts and coverage gaps in the US. Local government, in particular, has gradually escaped the public eye as news desks became smaller. As one interviewee put it, "it's just a matter of math." These recent challenges to the public service role of the press have precedents in the austerity that characterized the shareholder value maximization rationale that emerged in the 1980s and 1990s. Our data suggest that by the late 1990s, editorial choices at P.I. had in part become contingent on

advertising: Initiatives to increase reporting on local matters were thwarted because net advertising income from local, low-circulation supplements was lower than that of national advertisements in the main newspaper. Furthermore, budgetary austerity had more direct effects on the public service function of the press as well:

> I said [to my reporter]: "Why don't we try to send you to Afghanistan and try to find Osama Bin Laden?" But I had no money in my budget because it had been cut. So I went to the publisher and explained what I wanted to do, and why, and how much money I needed....He said to me: "Who gives a fuck about Afghanistan?"...Four months later, 9/11 happened." (Quote 10, US).

In Flanders, a similar mindset of "news as a market good" is widespread and challenges traditional Flemish ideas of the public service role of legacy news media, albeit in different ways. Our data suggest that the ways in which Flemish newsrooms interpret values such as "autonomy" and "objectivity" have gradually transformed over time. Older generations advocate their prerogative to take a political stance and "stick your neck out" (interview excerpt) to defend certain policies. On the other hand, interviewees who are currently in the business champion the idea of "political neutrality" (conform to the "myth of neutrality" proposed by Schiller, 1973), which has translated into a new set of editorial values that incorporates the importance of reader preferences in a commodified market: "We no longer wrote about whether Belgium should be split in two or three. Whether financial legislation should be reviewed. No, we focused on questions like 'Why are there so many traffic casualties?'" (Quote 11, Flanders).

This change in the general editorial attitude of Flemish newsrooms represents a different aspect of neoliberal hegemony, namely a tendency towards depoliticized. In the abovementioned example, traffic casualties are considered a neutral and apolitical topic that directly affects the lives of consumers and is therefore worthy of more attention as compared to the intricacies of financial legislation.

7. Conclusion

This article argues that comparative journalism studies can benefit from revising the sociohistorical approach that was championed by Hallin and Mancini (2004) in order to understand post-Cold War era developments of media systems. However, rather than strictly adhering to the media systems typology that they developed, we argue in favor of adopting new historical lenses. Via an exploratory qualitative analysis of two case studies (US and Flanders), we provide evidence for the viability of adopting the lens of global neoliberal hegemony toward interpreting recent developments in media markets and the collective consciousness that guides journalistic practice (doxa).

First of all, we argue that neoliberal policy has inherently transformed the media market on both sides of the Atlantic, albeit with different outcomes. In the US, which proved to be a more fertile soil for neoliberal transformation, profitable newspapers of record such as the P.I. have been in a continuous state of decline since their 1980s heyday due to budgetary austerity. Though P.I. had been a newspaper of record that boasted a newsroom of well over 600 people until the late 1990s (including foreign desks), today it is reduced to a metropolitan newspaper that lacks the human resources to cover local government adequately. Following the logic of shareholder value maximization, majority shareholder Knight-Ridder required that the P.I. reach unsustainable profitability goals while foregoing further investment in the newsroom. Eventually, Knight-Ridder sold its shares and diverted its attention to more profitable endeavors. In Flanders, where

neoliberal reforms were enacted at a slower pace, competition for advertising revenues in the newspaper market increased after the liberalization of the television market in the late 1980s. The emergence of a post-Cold War ideological consensus of neoliberal hegemony contributed to diminishing audience loyalty, which had traditionally been based on political or ideological affiliation. In a bid to win new audiences, Flemish newspapers gradually became less political and adopted the logic of markets. Economies of scale were pursued to guarantee profitability, resulting in a duopoly where newspapers from different ideological traditions are effectively owned by the same companies, eroding the local tradition of external pluralism.

Concerning the incorporation of neoliberal ideals and ways of thinking (e.g., commodification, consumerism, competition, individualism, depoliticized) into journalistic doxa, we provide evidence of an analog development in Flanders and US newsrooms' attitudes concerning audience preferences, role perceptions, and collaboration between journalism and business. Newsrooms appear to be more receptive to the idea of journalism's innate subjugation to the rules of the market and the necessity for austerity during financially dire times. Despite regional differences in how these attitudes are expressed, they align largely with the neoliberal way of thinking on both sides of the Atlantic. Audiences are reduced from citizens of a nation-state (which is in tune with the hegemonic paradigm of the welfare state) to consumers in a global (or supranational) marketplace. Freedom as a concept is subsequently reduced to the freedom of audiences to purchase news commodities in the marketplace. As a result, newsroom personnel have internalized that they need to be more aware of audience preferences in order to safeguard their competitive advantage (and survival) and perform their societal functions. In other words, interviewees from our case study are convinced by the idea that they are, in the first place, subject to the punishing hand of the market instead of any sort of professional oath (comparable to the Hippocratic oath in the medical profession). Both in the US and Flanders, it appears that the neoliberal reflex to approach news as a salable consumer commodity poses challenges to the democratizing roles of journalism. This aligns with anti-democratic tendencies that are embedded in neoliberal ideology and the adage of "consumerism trumps state." Arguably, the idea of public service itself has been transformed within the boundaries set by neoliberal hegemonic thought. In Flanders, this contributed to the depoliticized of the press, making it more akin to the American press and its values of neutrality. However, within any hegemonic framework, the concept of neutrality is contested, as it only serves to reproduce hegemonic values that have been elevated as objective truths.

We re-emphasize that this article has primarily been an exploratory effort. We have attempted to draw parallels in transatlantic media system development based on a limited selection of available data. Other themes could have also been presented (e.g., labor precarity and the value of objectivity), though they were left out due to spatial constraints. Similarly, other characteristics of the post-Cold War era could have been considered as a primary lens and would undoubtedly have generated interesting results.

Acknowledgments

Funding

Conflict of Interests

The authors declare no conflict of interest.

Supplementary Material

Supplementary material for this article is available online in the format provided by the author (unedited).

References

Albæk, E., van Dalen, A., Jebril, N., & de Vreese, C. H. (2014). *Political journalism in comparative perspective.* Cambridge University Press.

Benson, R., & Neveu, E. (2005). Introduction: Field theory as a work in progress. In R. Benson & E. Neveu (Eds.), *Bourdieu and the journalistic field* (pp. 1–25). Polity Press.

Berry, M. (2019). Neoliberalism and the media. In J. Curran & D. Hesmondhaigh (Eds.), *Media and society* (pp. 57–82). Bloomsbury.

Bornat, J. (2003). Oral history. In C. Seale, G. Gobo, J. F. Gubrium, & D. Silverman (Eds.), *Qualitative research practice* (pp. 34–47). SAGE.

Bourdieu, P. (1998). *On Television.* The New Press.

Bourdieu, P. (2005). The political field, the social science field, and the journalistic field. In R. Benson & E. Neveu (Eds.), *Bourdieu and the journalistic field* (pp. 29–47). Polity Press.

Breed, W. (1955). Social control in the newsroom: A functional analysis. *Social Forces*, *33*(4), 326–335.

Brüggeman, M., Engesser, S., Büchel, F., Humprecht, E., & Castro, L. (2014). Hallin & Mancini revisited: Four empirical types of Western media systems. *Journal of Communication*, *64*(6), 1037–1065.

Burkitt, B., & Baimbridge, B. (1994). The Maastricht Treaty's impact on the welfare state. *Critical Social Policy*, *14*(42), 100–111. https://doi.org/10.1177/026101839401404208

De Bens, E., & Raeymaeckers, K. (2010). *De pers in België: Het verhaal van de Belgische dagbladpers gisteren, vandaag en morgen.* Lannoo Campus.

de Ridder, H. (2001). *Geen blad voor de mond. Notities voor een biografie.* Uitgeverij Lannoo.

Dobek-Ostrowska, B. (2019). How media systems work in Central and Eastern Europe. In E. Polonska & C. Beckett (Eds.), *Public service broadcasting and media systems in troubled European democracies* (pp. 259–278). Palgrave Macmillan.

Friedman, M. (1951). *Neo-liberalism and its prospects.* Farmand.

Friedman, M. (1962). *Capitalism and freedom.* The University of Chicago Press.

Fukuyama, F. (1989). The end of history? *The National Interest*, *16*, 3–18.

Gans, H. J. (1979). *Deciding what's news.* Northwestern University Press.

Gorman, L., & McLean, D. (2003). *Media and society in the twentieth century.* Blackwell Publishing.

Guelke, J. (2005). The political morality of the neo-conservatives: An analysis. *International Politics*, *42*, 97–115. https://doi.org/10.1057/palgrave.ip.8800101

Halberstam, D. (1975). *The powers that be.* Knopf.

Hallin, D. (2008). Neoliberalism, social movements and change in media systems in the late twentieth century. In D. Hesmondhalgh & J. Toynbee (Eds.), *The media and social theory* (pp. 43–58). Routledge.

Hallin, D., & Mancini, P. (2004). *Comparing media systems.* Cambridge University Press.

Hallin, D., & Mancini, P. (2016). Ten years after comparing media systems: What have we learned? *Political Communication*, *34*(2), 155–171.

Harvey, D. (2005). *A brief history of neoliberalism.* Oxford University Press.

Hayek, F. A. (1960). *The constitution of liberty.* University of Chicago Press.

Herman, E., & Chomsky, N. (1988). *Manufacturing consent*. Vintage.

Herrero, L. C., Humprecht, E., Engesser, S., & Brüggeman, F. B. (2017). Rethinking Hallin and Mancini beyond the West: An analysis of media systems in Central and Eastern Europe. *International Journal of Communication, 11*, 4797–4823.

Holslag, J. (2021). *Van muur tot muur: De wereldpolitiek sinds 1989*. De Bezige Bij.

Jakobsson, P., Lindell, J., & Stiernstedt, F. (2021). A neoliberal welfare state? The Swedish media system in transformation. *Javnost—The Public, 28*(4), 375–390. https://doi.org/10.1080/13183222.2021.1969506

Kaiser, J., & Kleinen-von Königslöw, K. (2019). Partisan journalism and the issue framing of the Euro crisis: Comparing political parallelism of German and Spanish online news. *Journalism, 20*(2), 331–348. https://doi.org/10.1177/1464884916683548

Leysen, A. (1993). *De Naakte Staat*. Uitgeverij Lannoo.

MacPherson, J. B. (2006). *Journalism at the end of the American century, 1965–present*. Praeger Publishers.

McChesney, R. W. (2001). Global media, neoliberalism and imperialism. *Monthly Review, 52*(10). http://doi.org/10.14452/MR-052-10-2001-03_1

McManus, J. H. (2009). The commercialization of news. In K. Wahl-Jorgensen & T. Hanitzsch (Eds.), *The handbook of journalism studies* (pp. 218–233). Routledge.

Mearsheimer, J. (2019). Bound to fail: The rise and fall of the liberal international order. *International Security, 43*(4), 7–50. https://doi.org/10.1162/isec_a_00342

Michielsen, S. (n.d.). *Toen kon het plots wel, de begroting saneren*. De Tijd. https://multimedia.tijd.be/25jaarmaastricht/

Mirkowski, P., & Plehwe, D. (2009). *The road from Mont Pèlerin*. Harvard University Press.

Nicol, D. (2010). *The constitutional protection of capitalism*. Bloomsbury.

Nielsen, R. (2016). The many crises of Western journalism: A comparative analysis of economic crises, professional crises, and crises of confidence. In J. Alexander, E. Breese, & M. Luengo (Eds.), *The crisis of journalism reconsidered* (pp. 77–97). Cambridge University Press.

Ohlsson, J. (2015). *The Nordic media market*. Nordicom.

Parmar, I. (2009). Foreign policy fusion: Liberal interventionists, conservative nationalists and neoconservatives: The new alliance dominating the U.S. foreign policy establishment. *International Politics, 46*(2/3), 177–209.

Phelan, S. (2018). Neoliberalism and media. In D. Cahill, D. Primrose, M. Konings, & M. Cooper (Eds.). *The SAGE handbook of neoliberalism* (pp. 539–552). SAGE.

Reid-Henry, S. (2020). *Empire of democracy: The remaking of the West since the Cold War*. John Murray Publishers.

Ruys, M. (1999). *Een levensverhaal*. Lannoo.

Schiller, H. (1973). *The mind managers*. Beacon Press.

Schiller, H. (1989). *Culture, Inc.: The corporate takeover of public expression*. Oxford University Press.

Slobodian, Q. (2018). *Globalists: The end of empire and the birth of neoliberalism*. Harvard University Press.

Ther, P. (2016). *Europe since 1989: A history*. Princeton University Press.

Umbricht, A., & Esser, F. (2014). Changing political news: Long-term trends in American, British, French, Italian, German and Swiss print media reporting. In R. Kuhn & R. K. Nielsen (Eds.), *Political journalism in transition: Western Europe in a comparative perspective* (pp. 195–218). I.B. Tauris.

Underwood, D. (1995). *When MBAs rule the newsroom*. Columbia University Press.

Varoufakis, Y. (2017). *And the weak suffer what they must?* Vintage.

Wandels, N., Mast, J., & Van den Bulck, H. (2022). Bureaucracy and authoritative control in contemporary legacy news media companies: A Weberian analysis of a Flemish case study. *Mediální Studia, 2*, 257–280.

Wandels, N., Mast, J., & Van den Bulck, H. (2023). The changing face of journalistic autonomy: A case study of de standaard (1976–2020). *Journalism Studies*, *24*(11), 1418–1439.

Williamson, J. (2003). The Washington consensus and beyond. *Economic and Political Weekly*, *38*(15), 1475–1481. https://www.jstor.org/stable/4413431

About the Authors

Nils Wandels obtained an MA in Middle Eastern languages and cultures at the University of Ghent and an MA in business economics at the Vrije Universiteit Brussel. In 2020, he received a PhD scholarship at the Brussels Institute for Journalism Studies at Vrije Universiteit Brussel. In 2023, he enrolled as a graduate student at Drexel University. His research focuses on the transformative impact of political and economic frameworks on journalistic values, attitudes, and practices.

Jelle Mast holds a PhD in communication sciences. His research is typically located at the intersection of visual communication, journalism practice, and professional ethics. His current research interests include visual gatekeeping and user-generated imagery in mainstream news media, journalism and terrorism, meta-journalistic discourse, and genre hybridization in journalism and screen documentaries.

Hilde Van den Bulck is head of the Communications Department at Drexel University. She combines expertise in media structure and policies with expertise in media culture. Her work focuses on the impact of technological, political, economic, and cultural processes, especially how digitization and convergence affect legacy media. Before coming to Drexel, Hilde was a professor of communication studies, head of the Department of Communication, associate dean of research, and dean of the Social Sciences at the University of Antwerp.

cogitatio

ARTICLE

Politicisation Persists and Is Increasing in European Public Service Media in the Digital Society

Tania Fernández Lombao [1], Olga Blasco-Blasco [2], and Francisco Campos Freire [1]

[1] Department of Communication Sciences, Universidade de Santiago de Compostela, Spain
[2] Department of Applied Economics, Universitat de València, Spain

Correspondence: Tania Fernández Lombao (tania.fernandez.lombao@usc.es)

Abstract

The open conclusions with which Hallin and Mancini (2004, 2011) approached their comparative study of Western media systems, initiated in 1998, retain their empirical, revisionist, and prospective value—even from critical perspectives—after a quarter of a century of profound historical, social, and technological changes. The names given to the three traditional media models in those authors' first publication are used in this article to compare the evolution of funding, audience shares, governance, structure, and political intervention in European countries' public service media on the one hand, and to contrast the operational hypothesis that politicisation persists and is increasing in European public service media in their adaptation to the digital society, on the other hand. Based on the variables from Hallin and Mancini's empirical model, five crucial questions about the evolution of public service media in the EU are addressed: intervention and development of regulation by states and by the European Commission in the area of shared powers; a comparative analysis of the funding systems and consumer audiences of each European country's public service media; the changes in the governance and management structures of said public service media; the variation in the professional culture and the rational-legal authority of their organisations; and the evolution and legitimation of public service media's public value in the internet society, as well as the persistence or mutability of the national media systems' fit within Hallin and Mancini's three original models.

Keywords

European Union; funding systems; media regulation; media systems; politicisation; public service media

---

1. Introduction

Hallin and Mancini's (2004, 2011, 2016) comparative study of Western media systems is an empirical model that, 20 years after its first publication, may be the object of operational and critical revisionism, but it has methodological validity for the analysis of the structures, convergences, and divergences of relationships between political power and the media. This article specifically focuses on the relationships between the policies of European democratic states and their public service media (PSM).

The structure of Hallin and Mancini's model is operational—even though the inference of results may be divergent—for comparing the evolution of funding, audience shares, governance, structure, and political intervention in the PMSs of European states and the United States, according to their respective political systems. Hallin and Mancini (2004) predetermined three media models: the polarised pluralist model (France, Greece, Italy, Portugal, and Spain), the democratic corporatist model (Austria, Belgium, Denmark, Finland, Germany, the Netherlands, Norway, Sweden, and Switzerland), and the liberal model (United Kingdom, United States, Canada, and Ireland). In the 2011 and 2017 revisions of their work, they expanded the focus to include some Eastern European countries and the digital sphere.

The characteristics of the polarised pluralist model are manifested by a lack of control over concentration in the television industry; a strong, polarised elite press; and a governmentalised public service television system under politicised and partisan control and based on government subsidies. This model is also characterised by a high level of governmentalised political parallelism, strong state intervention with insufficient public control, and a lower level of professionalisation. According to the authors, all of the above are due to late democratisation (Padovani, 2009) and polarised pluralism, with a significant role being played by political parties and clientelism from the viewpoint of rational-legal authority.

The democratic corporatist model is also defined by a mass, high-circulation press and limited concentration in the audiovisual media industry. The control of PSM is democratic, while funding is a combination of subsidies and licence-fee income under sociopolitical representation control. Political parallelism has experienced an evolution from a partisan press in the past to a network of neutral commercial media with a high level of professionalisation and self-regulation. As for public control, it is considered to be low due to strong respect for freedom of expression, although state intervention is high. The characteristics of this model are early democratisation and moderate pluralism rooted in consensus governments, organised pluralism, a strong welfare state, and the development of strong rational-legal authority.

Finally, the liberal model is characterised by the development of a commercial mass press and an audiovisual media industry based on regulated competition. As far as PSMs are concerned, they are democratically regulated, with independent regulatory mechanisms and funding dependent on a licence fee and public funding. However, it is not a homogeneous model as there are differences, for example, between the PSM of the United Kingdom and Ireland, and that of the United States. Political parallelism is reflected in the predominance of neutral commercial media focused on informative journalism and pluralism, and they also have a high level of professionalisation and non-institutionalised self-regulation. In this case, it is the market that regulates the media system—excluding PSM—within the context of liberalism exercised by the state. The seed of this model, as in the democratic corporatist one, also comes from early democratisation and moderate pluralism, as well as the development of strong rational-legal authority.

2. Theoretical Framework

2.1. Twenty Years of Scientific Literature on Hallin and Mancini's Systems

Academics have frequently used the media system framework of Hallin and Mancini (2004, 2011) to conduct research on the media. Brüggemann et al. (2014) reviewed the model 10 years later, with their study being the first to comprehensively validate the original dimensions and models with aggregated data for the same sample of Western countries. In this sense, they found that while the dimensions relating to market pressure, political parallelism, and professionalisation showed relatively high levels of internal consistency, the one referring to the role of the state did not. Thus, they recommended that the latter be broken down into three sub-dimensions: public broadcasting, ownership regulation, and press subsidies.

Regarding governance, Downey and Stanyer (2010) conducted a study to address what they considered patent shortcomings in Hallin and Mancini's media model proposal. They proposed a fuzzy-set qualitative comparative analysis to consider the complex causal combinations of political and media conditions. In the words of those authors:

> There are two causal paths to personalisation of political communication: one where the make-up of political institutions is predominant causally (particularly the presence of presidential systems) and the character of media institutions is relatively unimportant; another where a combination of political culture and media conditions explains personalisation irrespective of whether the political system is parliamentary or presidential. (Downey & Stanyer, 2010, p. 344)

They refrained from performing independent analyses of each variable. From the viewpoint of political information on television, a stand-out study is the one by Aalberg et al. (2010) on six Western countries over a period of 30 years. These authors found that the quantity and quality of political information varied according to the degree of commercialisation, with it being lower in liberal model countries. However, they noted differences between countries having the same model, with the United Kingdom being the clearest example due to its similarities with neighbouring countries. The data they added to the original ideas of Hallin and Mancini (2004) did not suggest any fast-moving overall convergence towards the liberal model, and they were struck by "how strongly resistant some European countries have been to subordinating the needs of democracy to profit making" (Aalberg et al., 2010, p. 255).

Hardy (2012) was critical of the use of the concept of "media systems" because he considered it unsuitable for many analyses. While acknowledging the strength of systems research for examining connections between the media and politics, he noted that the weakness was the tendency to generalise or extrapolate beyond what was restricted to these important relationships. For this author, there is a tension between the analysis of the set of characteristics that have shaped media systems organised along national lines on the one hand and transnational dynamics on the other.

Hallin and Mancini's media systems have also been useful for analysing paradigm shifts in the media industry. The study by Benson et al. (2012) looked at how media system differences in the form of news either change or remain the same as the press switches from print to digital format in all three systems. By doing so, the study concluded that there was a tendency towards more advertising and information in the liberal model,

and towards more opinion and deliberation in the polarised pluralist model. It noted greater protection in the French case (in the polarised pluralist model) from market pressures.

Hallin and Mancini (2016) resented a reflection on new digital media and their relationship to the media system model that they had devised in 2004, remaining open to finding independent logics based on transnational structures such as Facebook or WhatsApp platforms. Such independence might suggest that digital media are globally more alike than other media within national media systems.

For these authors, the internet has significantly increased the tendency for transnational media institutions—including technological platforms—to become strong players, although they note the coexistence of three different patterns, the first being based on the fact that the concept of "media systems" does not imply that they are closed and self-contained. Indeed, for them, the extent to which national media systems are affected by global flows may be an important variable with which to characterise each one. The second possibility is that new media develop differently in each media system following each of the three patterns and giving them significant continuity. A third option is to imagine that new media do not follow existing patterns, but occupy niches that were not filled by the existing media system institutions, from the perspective of media ecology.

Other research for comparative studies of digital media systems emerged after Hallin and Mancini (2016) presented their reflections on the digital context. Flensburg and Lai (2020) analysed the current context from the fields of infrastructure studies, internet governance, and political economy of the internet with the tradition of systemic media analysis, and concluded that existing frameworks were insufficient for capturing power structures in a complex environment. The authors developed the digital communication systems framework to map the components of digital communication systems within national and regional contexts in order to describe new typologies and detect structural differences and similarities.

The media system model expounded by Hallin and Mancini (2004) has led to other initiatives for developing comparative communication studies, always with the premise of theorising the role of the context. Mobile communication has also been the subject of analysis by academics such as Liu et al. (2020), who argue that what is mobile is not the information, the user, or the technology, but the context, through present and absent configurations of social relations. These authors defend the use of comparative studies for analysing communication contexts with different methodologies and forms of evidence.

Hallin and Mancini's analysis model has also inspired researchers to look into issues such as the fragmentation of news audiences across different media platforms—press, television, and the internet. A study by Fletcher and Nielsen (2017) in six countries revealed high levels of audience duplication, as well as cross-platform audiences, with greater fragmentation in Denmark and the United Kingdom than in Spain and the United States. They concluded that there was no evidence to support the idea that online audiences were more fragmented.

In the course of the second decade of the 21st century, there were new revisions and expansions of Hallin and Mancini's model, such as the analysis by Büchel et al. (2016) of the media systems of 11 Central and Eastern European countries, all of which were in transition and had a similar historical situation. These authors presented four media system models: While two of them coincided with the polarised pluralism and liberal

models, they divided the democratic corporatist model into two groups differentiated by their media markets, one being marked by a weak press and the other by a regulated media market.

This study was expanded by Castro-Herrero et al. (2017) to suggest that press freedom and foreign ownership should be considered additional variables of theoretical interest due to their ability to exert influence in Central and Eastern European countries. In their study, the political party/media parallelism category was dropped in order to avoid what they considered low levels of internal consistency, due to high degrees of electoral volatility and a lack of clear party alignment.

In the same vein, the work by Humprecht et al. (2022) broadened the perspective and presented an analysis of the media systems of 30 European countries and the United States, with the incorporation of issues relating to digitalisation. They obtained three groups: The first was similar to the democratic corporatist model; the second had characteristics similar to the polarised pluralist model, and included Eastern and Southern European countries; and the third "hybrid" one was situated between the two previous models and included countries assigned to the liberal, polarised pluralist (France, Italy, and Portugal), and democratic corporatist models. This group also included three Eastern European countries (Czechia, Estonia, and Lithuania).

Hallin and Mancini's proposal has also drawn criticism from Latin America. Some authors consider the media system proposal insufficient for the purposes of contextualising the predominant models of journalistic role performance in non-Western parts of the world. Mellado et al. (2017) highlighted the hybridisation of journalistic cultures through the analysis of the presence of six journalistic roles in print news from 19 countries. The study concluded that there was multilayered hybridisation in the performance of professional roles across and within advanced, transitional, and non-democratic countries.

Hallin and Mancini's (2011) expansion of the study, in which, among other cases, they covered Brazil, China, Israel, Lebanon, Lithuania, Poland, Russia, Saudi Arabia, South Africa, and Thailand, was deemed insufficient by the above-mentioned authors. In contrast, Guerrero and Márquez-Ramírez (2014) used Hallin and Mancini's proposal to study the Latin American context and challenge the predominant categorisations of media systems. Among their conclusions, those authors referred to the development of a "captured liberal" model due to the intentional absence of regulation, the pragmatic exercise of power, and the configuration of alliances between media magnates and the political elites that lead to high levels of concentration.

For his part, Hallin (2020) criticised works produced using quantitative research and a large number of cases of analysis, and advocated more contextualised studies with space for reflection on how to theorise in the changing environment of the media.

2.2. Developments in EU Legislation and the Impact on PSM

In the last quarter of the 20th century, the European audiovisual media model was historically a dual one based on the coexistence of public and private media. That coexistence was far from peaceful and, from among the conflicts in which it was mired, it is possible to highlight the funding framework, the scramble for audience share and advertising, and the protection of film and audiovisual media as symbolic and strategic industries for European cultural diversity. From the first decade of the 21st century, a third actor came into play in the media ecosystem: digital networks and platforms.

European audiovisual media policies in the third decade of the 21st century are derived from the Audiovisual Media Services Directives of 2007, 2010, and 2018; the Communications of 2001 and 2010; and the Protocol to the Treaty of Amsterdam. The Directive of the European Parliament and of the Council of 14 November 2018 (2018) expands the dual framework to that of the three spaces for large operators (public, traditional private, and digital platforms), thus representing a partial advance towards regulatory symmetry within the European audiovisual media ecosystem.

The new Audiovisual Media Services Directive was adopted in 2018. It updated the 2010 regulations of the same rank and obliged member states to adapt their audiovisual media legislation. In general, the regulation of platforms by member states is a mere regulatory transposition, while the regulation of PSM by member states—who share powers with the EU—is almost non-existent.

The main objective of this regulation is to regulate digital platforms, which are new operators within the media ecosystem that up to now have only come under the legal regulations of e-commerce, thus causing asymmetric commercial competition and a major impact on the business models of traditional media (Campos Freire et al., 2018).

The preamble to the Directive is based on the evolution of audiovisual media services in relation to the convergence between television and streaming and on-demand internet services. New forms of consumption were the main reasons behind the revised regulation, the aim of which is to ensure balanced regulation of digital platforms and networks vis-à-vis traditional operators.

The challenge is to transfer obligations to online service platforms that up to now have fallen solely on traditional broadcasters, such as the European content quota, within a context where audiences are increasingly consuming more content on the internet (Caballero Trenado, 2018). Thus, from now on platforms will work according to rules similar to those regulating the more than 5,000 television channels that exist in the EU. The objective is twofold: to balance competitiveness and consumer protection.

The text, in 11 chapters and 33 articles, has the country of origin principle at its core, according to which services in the audiovisual media field are subject only to the provisions in force in the country where they operate. The importance of this point lies in the determination of jurisdiction over providers and procedures for exception and cooperation, although it does not affect copyright or the scope of licences.

While the promotion of the audiovisual industry in the EU is one of the challenges to be addressed, the Directive imposes an obligation on audiovisual content providers to reserve 20% of the offering for European works in their programming schedules, whatever their ownership and nature. Likewise, it makes aspects of advertising regulation more flexible and member states will be able to decide whether to impose funding obligations for European works on the on-demand services available in their respective countries.

The protection of minors is also one of the pillars of the Directive due to the increased consumption of content on the internet by those under the age of 18. The Directive aims to promote the active responsibility of online content and audiovisual service providers, and also of traditional media, even if they do not have editorial responsibility for much of the content they distribute (Caballero Trenado, 2018). Among the measures, the definition of products as "harmful content" when they are indeed harmful is called for, as is the obligation to

adopt parental control systems based on age-related codes. The prohibition of hate speech is another of the Directive's values. It prohibits any manifestation of racism and xenophobia, and incitement to violence and hatred based on sex, race, colour, religion, descent, or nationality or ethnic origin.

From a governance viewpoint, the Directive pays attention to the obligation to establish independent national regulatory authorities, whose five powers must be the defence of media pluralism, cultural and language diversity, consumer protection, proper functioning of the internal market and promotion of fair competition.

Besides the Directive, there are other regulatory mechanisms that regulate funding, another of the fundamental pillars for the existence and legitimacy of PSM. The Protocol to the Treaty of Amsterdam of 1997 is the legal text that supports state funding of public service broadcasting with the conditions of safeguarding pluralism, having democratic control and promoting sociocultural values. Its tenets are complemented by the European Communications of 2001 and 2009 on state aid rules applicable to public service broadcasting.

The Protocol to the Treaty of Amsterdam provides a legal basis for public funding on the grounds that the public broadcasting systems of member states are intrinsic to the democratic, social, and cultural needs of each society, as well as to the requirement to preserve media pluralism (Treaty of Amsterdam, 1997).

Thus, the European Commission (2001) published the *Communication From the Commission on the Application of State Aid Rules to Public Service Broadcasting*, which was expanded in 2009, to address commercial operators' concerns. In this sense, it established the relevance of a mechanism for evaluating public aid, with a prior review of the new services implemented by PSM, as well as clarifications on the incorporation of paid-for products within the public service mission. The new Directive also called for greater state-level oversight of corporate missions.

The 2009 Communication recognised PSM's right to operate on other platforms, provided the principles linked to their public service mission as specified in the Protocol to the Treaty of Amsterdam were upheld. That was when non-linear services were extended to PSM (European Commission, 2009). As a result, member states became responsible for establishing the appropriate mechanisms for ensuring regular and effective control of public funding to prevent overcompensation or cross-subsidisation.

2.3. Legitimation and Public Value

Competition from traditional private media, the emergence of new digital media, and PSM's loss of audience share and reputation have forced them to focus more on the quality and characteristics of their legal mandate. The BBC has adopted the conceptual narrative of public value to legitimise and justify innovation for its "digital-first" transition and transformation. The United Kingdom in 2006 and then, under the 2009 Communication on the funding of European state media, a further dozen European countries established the public value test to underpin the public value of innovation and the digital transformation of PSM. In addition, the European Broadcasting Union, which brings together and represents PSM, states that they share six core values: universality, independence, diversity, innovation, excellence, and accountability.

The concept of "public value," articulated for the first time by Moore (1995), has led to new strategies for, and studies of, PSM management (Gransow, 2018; Liddle, 2017; Mazzucatto et al., 2020; O'Flynn, 2007), the aim being to rethink their role in the current media system and develop new links with their stakeholders (Rodríguez-Castro et al., 2022), and all of this within a volatile context where transnational media groups and platforms are gaining power (Chalaby, 2010).

The most recognised application of this strategy was the above-mentioned public value test, with the BBC in the United Kingdom leading the implementation thereof as a way of legitimising itself (Michalis, 2012). This test is now guiding the daily actions of an increasing number of European PSMs (Cañedo et al., 2022). Meanwhile, efforts regarding theoretical conceptualisation continue to be made (Donders & Van den Bulck, 2016), with outstanding works such as the proposal of 12 mutable components in the definition of value developed by Cañedo et al. (2022).

2.4. PSM and the Digital Age

The digital adaptation of PSM has been one of the key debates in recent decades but, since 2020, the focus has shifted towards understanding the role of PSM within the context of platformisation (Cañedo & Segovia, 2022; Helmond, 2015; Poell et al., 2022). In that context, national PSM should provide competitive content to attract old and new audiences by connecting with their consumption habits.

In terms of formats and distribution, innovation is necessary when confronted with technological evolution and audience fragmentation and also for companies to distinguish themselves from their competitors in the media ecosystem (Zaragoza-Fuster & García-Avilés, 2018). *The Public Service Media and Public Service Internet Manifesto* warns that access to innovative, critical, and high-quality content must be provided with attention to audience diversity (Fuchs & Unterberger, 2021).

Faced with the dynamics of audiovisual-content globalisation, where power is concentrated in large over-the-top platforms (Srnicek, 2018), PSM outlets promote cultural proximity (Straubhaar, 2008). Furthermore, connecting with young audiences—the largest consumers of audiovisual technology—is important to guarantee the maintenance of symbolic representation. Likewise, it is one of the main drivers for ensuring the existence of a future PSM audience.

3. Comparison of PSM in the EU

In this article, we will consider those countries that are current EU member states—except Malta and Luxembourg, for which not enough data is available—with references also to the United Kingdom, a full member state of the EU until 2020. To observe PSM variation, we will consider the evolution of audience shares, funding, and governance, as well as the diagnosis of media pluralism in the respective countries based on the recognised annual analyses performed by the Media Pluralism Monitor (MPM) project of the Centre for Media Pluralism and Media Freedom at the European University Institute in Florence.

3.1. Evolution of Audience Shares

Between 2011 and 2021, European PSM's audience shares generally fell. Of the total number, the PSM of 17 countries experienced significant falls whereas 11 maintained or increased their audience shares according to data from The European Audiovisual Observatory (2022). As shown in Figure 1, the most significant quantitative increases were in the PSM of countries joining the EU midway through the first decade of the 21st century (Latvia, Estonia, and Lithuania), which later experienced processes of strengthening and reconfiguration of their respective PSM. In contrast, Romania, Portugal, Greece, Spain, Cyprus, Poland, and Slovenia had audience share losses exceeding 10% between 2011 and 2021.
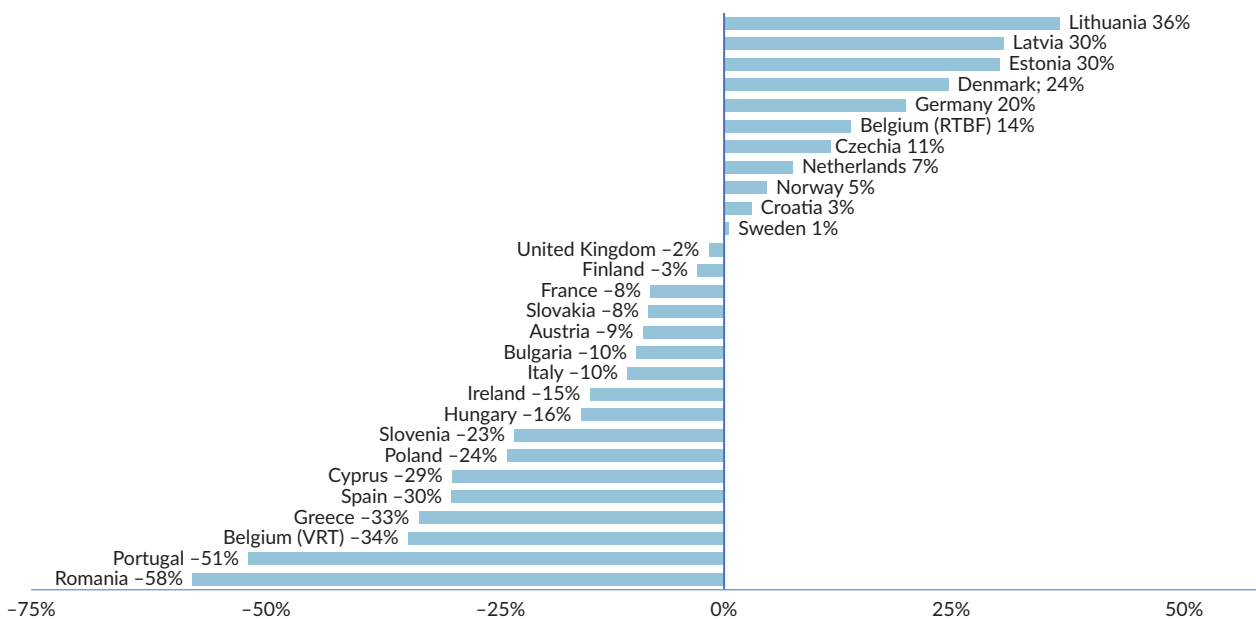

Figure 1. Audience trends for PSM, 2011–2021.

3.2. Evolution of Income

Based on data from The European Audiovisual Observatory (2022), it is possible to study the evolution of income from 2011 to 2021 (Figure 2). Using these data, we see an increase in income for the EU as a whole of more than 6%, albeit with variations between countries. The decrease in available funds is directly correlated with PSM's previously noted loss of audience share.

In the majority of countries that have more recently joined the EU, the increase in PSM's income has been greater. We can also see an increase in income in the Nordic states and Central Europe, whose countries come under the democratic corporatist model according to the typology of media systems defined by Hallin and Mancini, and in the United Kingdom, which falls under the liberal model according to that same typology.

In contrast, it is striking to note the decline in income in Southern European countries such as Greece, Spain, and Italy, which, according to Hallin and Mancini's classification, are included in the Mediterranean or polarised pluralist model. The almost 30% fall in income in Portugal is likewise surprising. These countries were also at the centre of European economic intervention during the financial crisis of 2009–2012.

Funding through state budgets controlled by governments, as opposed to the BBC's licence fee model or that of countries in Northern and Central Europe, weakens sustainability and independence while increasing the risk of politicised instrumentalisation.
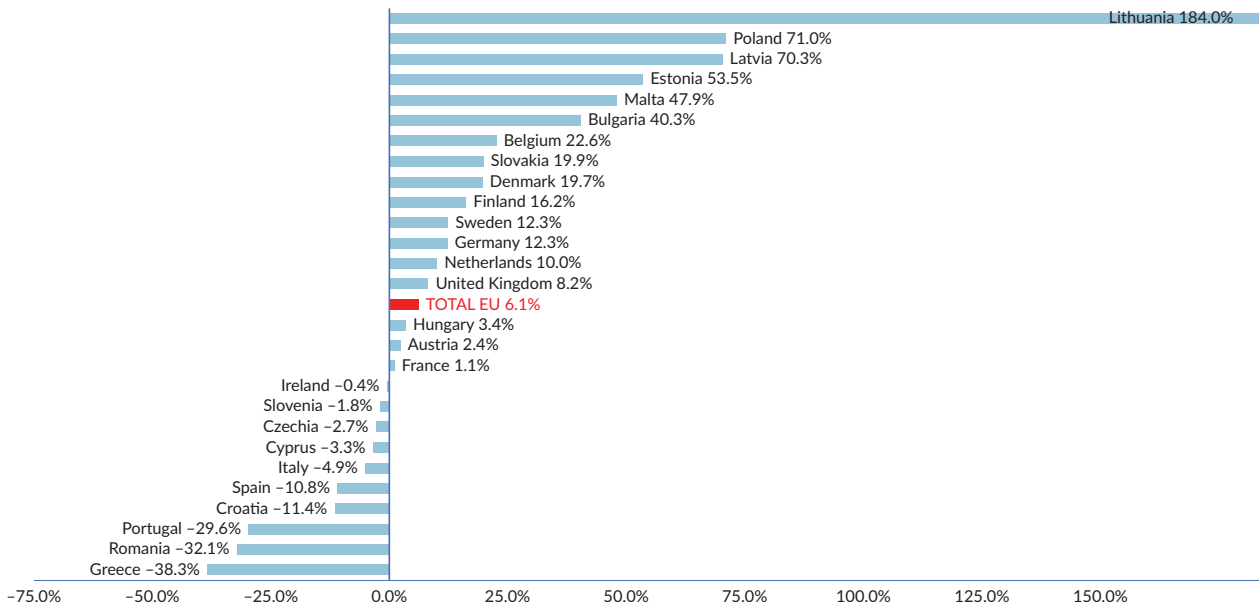
Figure 2. Evolution of the European PSM budgets, 2011–2021.

3.3. Governance and Management Structures

The governance and management structures of PSM are diverse and varied and more in line with the sociopolitical reality of each country than with Hallin and Mancini's three model framework. Nevertheless, that framework does indeed record some of its features. Firstly, there are some PSMs at the state level and others at regional and federal state levels, or indeed those covering distinct cultural and language communities.

Such cases can be found in Germany, where a state PSM (ZDF) coexists with nine other PSM of the *Länder* or federal states, which are integrated into the ARD; in Spain, where the state PSM (RTVE) and 13 other PSM of the autonomous communities (12 of which are grouped under FORTA); and in Belgium, with three entities from the respective French, Flemish and German communities. The PSMs of other European countries are organised centrally or by the respective regional cultural and language realities of their states. Despite the potential interest in studying the peculiarities of each region, in this study, we have only analysed PSM at the state level due to a lack of data.

Another characteristic of diversity is the corporate structure of PSM. In the majority of European countries, the respective and distinct radio, television, and digital services companies have undergone processes of integration into a single corporation. However, there are still some countries (France, Sweden, Poland, Czechia, Romania, and Bulgaria) in which these processes of transforming broadcasting (radio and television) into converged and integrated PSM have not taken place. France has been debating the process of integrating its four organisations into France Médias for many years.

The three governance structures of PSM are a board of directors, a president or director-general, and a supervisory and advisory council of programming and public or audience participation. The names and titles that each country gives to these bodies and positions vary. The number of members on the board of directors ranges from three to 15 (except in the case of foundations such as the one in Austria, which has 35). Members are elected by parliaments and in part by some governments. They may also have members representing workers, as well as qualified independent members selected by open competition.

In the polarised pluralist system, the election of members and appointees to governance bodies by parliamentary political representation traditionally prevails, whereas in the liberal model, it is combined with formulas for co-opting independent members. In the democratic corporatist model, an influential factor is the pillarisation (*verzuiling* in Dutch) of the institutionalised strata into which society is segregated (political parties, trade unions, religions, cultural entities, schools, business organisations, associations, etc.), a legacy of Calvinism in Central and Northern Europe (the Netherlands, Belgium, Austria, Sweden, and Germany), which can be seen in the composition of broadcasting councils.

One of the latest changes has been in the United Kingdom. In 2017, the BBC adopted a governance model inspired by the ethical codes of publicly traded private companies. This is manifested by a balance of four types of representation on the BBC board: members elected by the parliaments of the United Kingdom nations, executives from the corporation itself, independently co-opted advisors, and a chair proposed by the government.

The uniqueness in the representation of administration and management systems (see Appendix 1 of the Supplementary File) diverges from the perspectives of Hallin and Mancini regarding how structures and traditions of political cultures in each country shape the varied governance models of PSM. That diverse uniqueness is intricately linked to the demonstration of their independence and reputation.

3.4. Indicators of PSM Pluralism

The MPM is a set of indicators developed by the Centre for Media Pluralism and Media Freedom at the European University Institute in Florence. It allows potential risks to media pluralism in the EU and neighbouring countries to be identified. The first MPM indicator data were obtained in 2014 for nine EU countries (Belgium, Denmark, Estonia, France, Greece, Hungary, Italy, and the United Kingdom). In 2015, the indicator covered an additional 19 countries and, since 2016, it has been expanded to all EU member states. The latter is taken as the point of reference for Appendix 2 of the Supplementary File. The report published in 2020 covered the years 2018 and 2019.

The MPM measures the risk to media pluralism and covers political, cultural, geographical, structural, and content-related dimensions. It also analyses public service, commercial, community, and new and online media. The indicator takes values between 0 and 100 and expresses them as a percentage. Thus, the higher the percentage, the greater the risk to the analysed variable. Thus, if the risk is low, the value will be between 0% and 33%; if the risk is medium, the value will be between 34% and 66%; and, if the risk is high, the value will be between 67% and 100%. The information obtained from the risk assessment allows stakeholders to understand threats to media pluralism and take measures to defend it (Centre for Media Pluralism and Media Freedom, 2017).

Although the compound indicator has four dimensions—fundamental protection, market plurality, political independence, and social inclusiveness—we have focused on the risk to the independence of PSM governance and funding. Based on MPM data, Appendix 2 of the Supplementary File reflects the indicators of the risks to media pluralism in general, and to the independence of PSM governance and funding, as part of the independence of PSM, in the respective European countries. When calculating the average of the four components of the indicator, we can see that most countries have a medium risk, even though the scores for each component are quite different.

If we look at the independence of PSM, it is striking to find that, for the period of years studied, there is a risk to it for Belgium, Denmark, Germany, Lithuania, the Netherlands, Sweden, and Portugal (with a considerable increase in the score in correlation with some changes to that country's PSM internal governance structure). All of these countries come under the democratic corporatist model, with the exception of Portugal (politicised pluralist model) and Lithuania (not included in Hallin and Mancini's classifications).

Among the countries showing high risk in all the years studied were Cyprus, Hungary, Italy, Malta, Poland, and Romania. In this instance, such unequal assessments of the countries within the Mediterranean model are surprising, and barring Italy, which as we have seen before has shown high risk every year, Greece managed to fall to medium risk in 2022. Spain showed medium risk between 2017 and 2021 and high risk in the first and last years. France had a low risk from 2016 until the last year, in which the indicator rose to medium risk. Ireland, under the liberal model, was situated as medium risk. It would be advisable for policymakers in all these countries to plan policies that aim for greater independence of the media.

4. Conclusion

Hallin and Mancini's theses confirm the persistence of governmentalisation and political intervention in the PSM of European countries, though some of them—especially those forming part of the fifth enlargement of the EU in 2004 (Czechia, Cyprus, Estonia, Slovakia, Hungary, Latvia, Lithuania, Malta, and Poland)—are not covered by the three classifications of the authors' model.

That hypothesis is contrasted with the high dependence of PSM governance bodies on governments and parliamentary political systems, whose appointment and renewal terms also replicate ordinary legislature periods. This is complemented by institutionalised formulas for the political linkage of social participation bodies that have hardly taken advantage (except in Ireland and the United Kingdom) of the advances in digital transformation that these organisations have embarked upon—as a strategic innovation challenge—to integrate direct audience participation.

The stand-out conclusion, in light of Hallin and Mancini's historical analytical framework, is that the polarised pluralism model—with some mutations and variants—is the predominant and growing one in both the traditional Mediterranean countries and the newly incorporated Eastern European ones. Changes in funding systems—with a licence fee or charge payable by households or citizens in decline, as demonstrated by the fact that 16 countries had such a tax in 2016 and only 12 did so in 2023—confirm the predominance of subsidies linked to state budgets, which are dependent on the respective governments' discretion.

The indicators of pluralism, independence of PSM governance and funding, and the vulnerability of media systems likewise reaffirm those trends as they represent a medium or high risk in countries other than those falling into the democratic corporatist model, thereby jeopardising fundamental protection, market plurality, political independence, and social inclusiveness.

Funding

Conflict of Interests

The authors declare no conflict of interests.

Supplementary Material

Supplementary material for this article is available online in the format provided by the author (unedited).

References

Aalberg, T., Van Aelst, P., & Curran, J. (2010). Cross-national comparison media systems and the political information environment. *International Journal of Press/Politics*, *15*(3), 255–271.

Benson, R., Blach-Ørsten, M., Powers, M., Willig, I., & Zambrano, S. V. (2012). Media systems online and off: Comparing the form of news in the United States, Denmark, and France. *Journal of Communication*, *62*(1), 21–38. https://doi.org/10.1111/j.1460-2466.2011.01625.x

Brüggemann, M., Engesser, S., Büchel, F., Humprecht, E., & Castro, L. (2014). Hallin and Mancini revisited: Four empirical types of Western media systems. *Journal of Communication*, *64*(6), 1037–1065.

Büchel, F., Humprecht, E., Castro-Herrero, L., Engesser, S., & Brüggemann, M. (2016). Building empirical typologies with QCA: Toward a classification of media systems. *The International Journal of Press/Politics*, *21*(2), 209–232. https://doi.org/10.1177/1940161215626567

Caballero Trenado, L. (2018). Reflexiones en torno a los desafíos regulatorios de la nueva Directiva de Servicios de Comunicación Audiovisual. In M. Rodríguez-Castro, S. Pérez-Seijo, & F. Campos-Freire (Eds.), *La TV pública en Europa: Innovación, retos y tendencias* (pp. 49–72). Sociedad Latina de Comunicación Social.

Campos Freire, F., de Aguilera-Moyano, M., & Rodríguez-Castro, M. (2018). Impacto de las plataformas globales en la competencia mediática y los resultados de las empresas de comunicación europeas. *Communication & Society*, *31*(3), 223–238.

Cañedo, A., Rodríguez-Castro, M., & López-Cepeda, A. M. (2022). Distilling the value of public service media: Towards a tenable conceptualization in the European framework. *European Journal of Communication*, *37*(6), 586–605. https://doi.org/10.1177/02673231221090777

Cañedo, A., & Segovia, A. I. (2022). La plataformización de los medios de comunicación de servicio público. Una reflexión desde la economía política de la comunicación. In M. Goyanes & M. Campos-Rueda (Eds.), *Gestión de medios públicos en el entorno digital: Nuevos valores, estrategias multiplataforma e internet de servicio público* (pp. 65–88). Tirant Humanidades.

Castro-Herrero, L., Humprecht, E., Engesser, S., Brüggemann, M. L., & Büchel, F. (2017). Rethinking Hallin and Mancini beyond the West: An analysis of media systems in Central and Eastern Europe. *International Journal of Communication*, *11*, 4797–4823.

Centre for Media Pluralism and Media Freedom. (2017). *Monitoring media pluralism in Europe: Application of the media pluralism monitor 2016 in the European Union, Montenegro and Turkey*. European University Institute. https://cadmus.eui.eu/bitstream/handle/1814/46786/CMPF-MPM_PolicyReport2017.pdf

Chalaby, J. K. (2010). Public broadcasters and transnational television: Coming to terms with the new media order. In P. Enlosifidis (Ed.), *Reinventing public service communication: European broadcasters and beyond* (pp. 101–113). Palgrave Macmillan.

Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in member states concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities. (2018). *Official Journal of the European Union*, L 303/69. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32018L1808

Donders, K., & Van den Bulck, H. (2016). Decline and fall of public service media values in the international content acquisition market: An analysis of small public broadcasters acquiring BBC worldwide content. *European Journal of Communication, 31*(3), 299–316. https://doi.org/10.1177/0267323116635833

Downey, J., & Stanyer, J. (2010). Comparative media analysis: Why some fuzzy thinking might help. Applying fuzzy set qualitative comparative analysis to the personalization of mediated political communication. *European Journal of Communication, 25*(4), 331–347. https://doi.org/10.1177/0267323110384256

European Commission. (2001). Communication from the Commission on the application of State aid rules to public service broadcasting. *Official Journal of the European Union*, C 320. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52001XC1115(01)

European Commission. (2009). Communication from the Commission on the application of state aid rules to public service broadcasting. *Official Journal of the European Union*, C 257. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52009XC1027(01)

Flensburg, S., & Lai, S. S. (2020). Comparing digital communication systems: An empirical framework for analysing the political economy of digital infrastructures. *Nordicom Review, 41*(2), 127–145.

Fletcher, R., & Nielsen, R. K. (2017). Are news audiences increasingly fragmented? A cross-national comparative analysis of cross-platform news audience fragmentation and duplication. *Journal of Communication, 67*(4), 476–498. https://doi.org/10.1111/jcom.12315

Fuchs, C., & Unterberger, K. (2021). *The public service media and public service internet manifesto*. University of Westminster Press.

Gransow, C. (2018). *Public Value-Konzepte im öffentlichen Rundfunk: Eine vergleichende Analyse europäischer Rundfunksysteme*. Springer

Guerrero, M., & Márquez-Ramírez, M. (Eds.). (2014). *Media systems and communication policies in Latin America*. Palgrave Macmillan.

Hallin, D. C. (2020). Comparative research, system change, and the complexity of media systems. *International Journal of Communication, 14*, 5775–5876.

Hallin, D. C., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (2011). *Comparing media systems beyond the Western world*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (2016). Ten years after comparing media systems: What have we learned? *Political Communication, 34*(2), 155–171. https://doi.org/10.1080/10584609.2016.1233158

Hardy, J. (2012). Comparative media systems. In F. Esser & T. Hanitzsch (Eds.), *Handbook of comparative communication research* (pp. 185–206). Routledge.

Helmond, A. (2015). The platformization of the web: Making web data platform ready. *Social Media + Society*, *1*(2). https://doi.org/10.1177/2056305115603080

Humprecht, E., Castro Herrero, L., Blassnig, S., Brüggemann, M., & Engesser, S. (2022). Media systems in the digital age: An empirical comparison of 30 countries. *Journal of Communication, 72*(2), 145–164.

Liddle, J. (2017). Public value management and new public governance: Key traits, issues and developments. In E. Ongaro & S. Van Thiel (Eds.), *The Palgrave handbook of public administration and management in Europe* (pp. 967–990). Palgrave Macmillan.

Liu, J., Liu, X., & Jensen, K. B. (2020). Comparative media studies in the digital age: Taking stock, looking ahead—Introduction. *International Journal of Communication, 14*, 5754–5760.

Mazzucato, M., Conway, R., Mazzoli, E., Knoll, E., & Albala, S. (2020). *Creating and measuring dynamic public value at the BBC*. UCL Institute for Innovation and Public Purpose. https://www.ucl.ac.uk/bartlett/public-purpose/sites/public-purpose/files/final-bbc-report-6_jan.pdf

Mellado, C., Hellmueller, L., Márquez-Ramírez, M., Humanes, M. L., Sparks, C., Stepinska, A., Pasti, S., Schielicke, A.-M., Tandoc, E., & Wang, H. (2017). The hybridization of journalistic cultures: A comparative study of journalistic role performance. *Journal of Communication, 67*(6), 944–967. https://doi.org/10.1111/jcom.12339

Michalis, M. (2012). Assessing the British public value test: Benefits, limitations and challenges ahead. *International Journal of Media & Cultural Politics, 8*(1), 13–30. https://doi.org/10.1386/macp.8.1.13_1

Moore, M. H. (1995). *Creating public value: Strategic management in government*. Harvard University Press.

O'Flynn, J. (2007). From new public management to public value: Paradigmatic change and managerial implications. *The Australian Journal of Public Administration, 66*(3), 353–366. https://doi.org/10.1111/j.1467-8500.2007.00545.x

Padovani, C. (2009). Pluralism of information in the television sector in Italy: History and contemporary conditions. In A. Czepek, M. Helwig, & E. Nowak (Eds.), *Press freedom and pluralism in Europe: Concepts and conditions* (pp. 289–304). Intellect.

Poell, T., Nieborg, D. B., & Duffy, B. E. (2022). *Platforms and cultural production*. Polity.

Rodríguez-Castro, M., Maroto González, I., & Campos Freire, F. (2022). Participación ciudadana y valor público: En búsqueda de la letimidad del servicio audiovisual público. In M. Goyanes & M. Campos-Rueda (Eds.), *Gestión en medios públicos en el entorno digital* (pp. 13–34). Tirant Humanidades.

Srnicek, N. (2018). *Capitalismo de plataformas*. Caja Negra.

Straubhaar, J. D. (2008, May 22–26). *Rethinking cultural proximity: Multiple television flows for multilayered cultural identities* [Paper presentation]. 58th Annual Meeting of the International Communication Association, Montreal, Canada.

The European Audiovisual Observatory. (2022). *Yearbook key trends 2022/2023: Television, cinema, video and on-demand audiovisual services—The pan-European picture*. https://yearbook.obs.coe.int/s/document/6774/yearbook-key-trends-2022-2023-television-cinema-video-and-on-demand-audiovisual-services-the-pan-european-picture

Treaty of Amsterdam Amending the Treaty on European Union, the Treaties Establishing the European Communities and Certain Related Acts, 1997.

Zaragoza-Fuster, T., & García-Avilés, J. A. (2018). Desarrollo de la innovación periodística en la televisión pública: El caso del RTVE Lab. *Hipertext.net, 2018*(17), 11–21. https://doi.org/10.31009/hipertext.net.2018.i17.02

About the Authors

Tania Fernández Lombao is a journalist and associate professor in communication sciences at the University of Santiago de Compostela and a doctor cum laude from the same university with the dissertation *Corporate Social Responsibility in Public Radio Televisions in the European Union*. She worked as head of Programs for Radio Galega, also in Radio Lugo—Cadena Ser, *El País*, *El Progreso*, Europa Press, and EFE. As a researcher, she has published and participated in journals and conferences of high academic impact on public service media.

Olga Blasco-Blasco holds her PhD in economic sciences from the University of Valencia. She is an associate professor of quantitative methods (Department of Applied Economics) at the same university. Her research field is quantitative methods applied to the culture and communication and selection and construction of indicators in these areas. In communication sciences, she has published some works proposing composite indicators to assess the European public service media.

Francisco Campos Freire is a journalist, journalism professor at the University of Santiago de Compostela, and honorary professor at the Technical Particular University of Loja (UTPL) in Ecuador. He is the author of several books on media change, digital social networks, and the governance and financing of European public broadcasting. In the field of public audiovisual media, he has supervised several doctoral dissertations, as well as research and development projects and transfer activities for companies and institutions in the sector.

Cogitatio

Commercial Television as a Blind Spot in Emerging Media Systems: Romania and Bulgaria's Cases

Mădălina Bălășescu [1] , **Vyara Angelova** [2] , **and Romina Surugiu** [1]

[1] Faculty of Journalism and Communication Studies, University of Bucharest, Romania
[2] Faculty of Journalism and Mass Communication, Sofia University St. Kliment Ohridski, Bulgaria

Correspondence: Mădălina Bălășescu (madalina.balasescu@fjsc.ro)

Abstract

This study explores TV in Romania and Bulgaria, both considered "emerging" media systems in post-communist studies (Sparks, 1995). It uses Hallin and Mancini's (2004) framework to analyze the central aspects regarding the configuration of commercial TV. The study offers an institutional perspective on TV by exploring the licensing frame and the TV offer. The interaction between commercial TV, politics, and the state underlines the intricate relations through powerful and influential networks involving the interests of a variety of individuals and groups. Currently, commercial TV is the most developed type of media in both countries. Through its empirical contribution, this study fills in the blind spot of media research, aiming to contribute to the understanding of the Romanian and Bulgarian media landscape. It offers a critical perspective on TV systems in relation to the polarized pluralist/Mediterranean model of Hallin and Mancini, considering its explanatory function within the analysis of Eastern European media systems. Elements of the national markets revealed particularities of the TV business, synchronically connected to the contemporary "hyper-television" vision (Scolari, 2009) and the "informational disorder" paradigm (Tambini, 2020).

Keywords

audiovisual; Bulgaria; commercial TV; Hallin and Mancini's model; media market; media system; Romania

1. Introduction

The post-communist societies experienced a "transition" from a socialist regime to a new democratic system, including a "transformation" of the state media system into a democratic one (Gross & Jakubowicz, 2013).

Due to its primary role in "Babylonian" public spaces, the TV field has been linked to systemic development by mirroring social change and contributing to the liberal-democratic foundation (Bignell & Fickers, 2008; Scolari, 2009).

In the mid-1990s, the dominant European frame of TV was commercial and privatized, after decades of public TV dominance. In Romania and Bulgaria, the TV field was structurally configured from "kilometer zero" of democracy, i.e., 1989, to the present age of "informational disorder" (Tambini, 2020), passing from one or two party-controlled channels to the current pluralist offer that is connected with the global ecosystem marked by "industrial convergence and the appearance of new formats and audiences [that] have re-designed the television system" (Scolari, 2009, p. 7). Between the two extremes, the TV metamorphosis included technical innovation, journalistic pioneers, and new business models. TV proved its great capacity to develop and adjust to the "quicksands" of transition, triggering a constant interest in its normative ground.

Our analysis starts from the tension between the normative liberal frame of TV (pluralist, democratic, private) and the systemic influence of politics or the state, showed by reports (Open Society Institute, 2005, 2008, pp. 5–6). We explore the status of Romanian and Bulgarian commercial TV after the 1990s. Researchers and audiences traditionally understand commercial TV to include private channels, financed predominantly by advertising revenue and focused on entertainment (Casey et al., 2008, p. 45). However, we use the term regarding all types of private TV channels, not only those whose aim is entertainment. Moreover, the digital "outburst" and rapid technical innovation led to the development of a plethora of private channels targeting the public and niche audiences, which focused on entertainment but also on science, culture, education, and current affairs ("news television"). The private initiative represents the main feature of commercial TV as an institution that is supposed not to be state-subsidized or financed.

Less explored in the literature about East European spaces, commercial TV in Romania and Bulgaria could represent the blind spot of the media systems in both countries. Our aim is to present its systemic features in relation to but not limited to the polarized pluralist/Mediterranean model proposed by Hallin and Mancini (2004) in their seminal theory on media systems and its later developments (Brüggemann et al., 2014; Castro Herrero et al., 2017; Hallin & Mancini, 2010, 2012, 2017). Although the Romanian and Bulgarian media systems display a mix of various national and Western elements (business models, infotainment culture, production practices, imported content), the option for the polarized pluralist model is motivated by the powerful role of political involvement in media, with deep roots in national histories (Gross, 2023; Ibroscheva & Stover, 2017).

2. Literature Review

2.1. TV Research Key Points

TV transdisciplinary research (Badenoch et al., 2013, p. 367) considers TV on the normative ground as the main "articulation" point between social structures and mass audiences (McQuail, 1987) and, historically, as an innovative form (1930–1940s), political and governmental actor (1960s), public institution preserving the national cultural heritage (1980s), professional practice and cultural industry (1980–1990s), and a transnational actor (2000s; Bignell & Fickers, 2008, pp. 12–14).

The modern European TV was considered "bipolar" in the Cold War context. The Eastern side corresponds to socialist TV of which Imre (2016) highlighted the mix between entertainment productions and the public service mission, underlining its intellectual-ideological ambivalence. In Romania, "besides national politics, other factors—technological, professional, and institutional factors specific to the medium of European broadcast relations—also played crucial roles in the development of Romanian television" (Mustață, 2012, p. 132). According to socialist TV studies, Eastern TV was—institutionally and technically—synchronic to European TV.

Studies on post-communist spaces focused on public TV. In Europe, "television has been characterized by a public service philosophy since its origins" (Scolari, 2009, p. 4). Only a few studies are on commercial TV, which was indirectly investigated within an eclectic methodological frame, focusing on the commercialization of content and concentration of ownership in a few hands (Donders et al., 2013). In Bulgaria, at the beginning of the 1990s, TV transformed from a source of "definitions and interpretations of the new and sometimes difficult-to-understand social reality" (Bakardjieva, 1995) to a "boom" of TV channels with their "often-questionable quality" (Ibroscheva & Stover, 2017), which now exercise economic and political influence on different social levels. Press freedom and foreign ownership are considered the sources of significant differences between media systems in post-communism (Castro Herrero et al., 2017). In Romania and Bulgaria, foreign investment in the media sector was welcomed, yet "opened a Pandora's box of issues" (Ibroscheva & Stover, 2007, p. 234).

Present-day TV is marked by liberalization (Roel, 2008), globalization, and technological convergence (Iosifidis, 2007), new business models based on new consumption habits, and digital lifestyle that coexist with the traditional style of production, distribution, and reception (Roel, 2008, pp. 99–101). TV shapes the transnational public space (Livingstone, 2005, p. 7), and remains a "fundamental phenomenon of our civilization" (Eco, 2021, p. 42), part of the "fabric of our social lives" (McRobbie, 1994, p. 112).

2.2. Comparing Media Systems

The research of the media systems from a comparative perspective has seven decades of tradition in Western Europe (Siebert et al., 1956) and is marked by Hallin and Mancini's (2004) theoretical framework based on four dimensions: political parallelism, journalistic professionalism, the role of the state, and media market. The analysis of Hallin and Mancini was conducted solely in Western hemisphere countries and proposed three media models: (a) liberal or North Atlantic, (b) democratic corporatist or Northern European, and (c) polarized pluralist or Mediterranean (Hallin & Mancini, 2004). The contribution of Hallin and Mancini became—in only one decade after publication—a "cornerstone in the field of comparative communication research" (Brüggemann et al., 2014), followed by numerous developments (Hallin & Mancini, 2010, 2012, 2017). Hallin and Mancini (2012, pp. 4–5) observed that many media systems combine important features (commercialization and politicization) of the liberal and polarized pluralist systems. They underlined that East European scholar observed the "Italianization or Mediterraneanizing of East European media systems in the post-Soviet period" but also noted the EU's influence on media policies (Hallin & Mancini, 2012, pp. 4–5). De Albuquerque (2012, p. 73) noted that the peripheral media systems are defined with reference to central models. Within Hallin and Mancini's model, public broadcasting is a variable in two major dimensions: political parallelism and journalism's professionalization. Commercial TV is not included in their original model or later developments.

Castro Herrero et al. (2017, p. 4797) tested the Hallin and Mancini framework in 11 countries from Central and Eastern Europe, concluding that there is no "unique type of East-Central European media system." However, the authors mentioned the similarities between the countries in Central and Eastern Europe (CEE) regarding political parallelism and public service broadcasting and the differences related to the variables of press freedom and foreign ownership. Bulgaria, Hungary, and Romania are included in the "Eastern cluster" characterized by:

> The highest levels of political parallelism combined with the lowest investments in and the lowest audience of PSB...the lowest rates of press freedom and relatively high levels of foreign ownership...the lowest levels of online news use, professionalization of the journalists, and regulation of media ownership. (Castro Herrero et al., 2017, p. 4810)

Romania is mentioned as "having weak party systems with a tendency to politically use the media" (Castro Herrero et al., 2017, p. 4811), while both Romania and Bulgaria share a history of strong media censorship and state control during communism. At a more general level, the authors conclude that public service broadcasting (among other dimensions) has a "high explanatory power" for all the countries in CEE (Castro Herrero et al., 2017, p. 4813).

One of the key features that have driven criticism of Hallini and Mancini's proposal seems to be the rapid development of digital media and communication worldwide and the varying pace at which these media evolved in different countries (Maniou, 2023, p. 1940). For Romanian and Bulgarian media, the conceptualization of Hallin and Mancini matches especially for its historical-contextual value: the legacy of advocacy-oriented journalism, the centrality of electronic media, the political interference, the state origin of TV as a political actor, etc. Nevertheless, the studies revealed that the polarized pluralist/Mediterranean model could not be applied very easily to Romania and Bulgaria (Gross, 2023, p. 62; Indzhov, 2021; Marinos & Spassov, 2023), and there is still a need for debate related to new dimensions of analysis. We consider that an evaluation of the functioning of commercial TV is needed to advance in proposing a more adequate media model for Romania and Bulgaria.

3. The Research

3.1. Research Questions

By considering the explanatory potential of Hallin and Mancini's framework for CEE's media, the specificity of the media systems in Romania and Bulgaria, and the existing criticism of the polarized pluralist/Mediterranean model, we formulate four research questions. The first explores the possibility of using commercial TV as a significant variable in Hallin and Mancini's model applied to CEE. Then, we focus on the main systemic features of commercial TV in both countries. A comparative perspective is envisaged in the third question. Further, the fourth question discusses the possible conceptual approach to understanding the current realities of commercial TV in Romania and Bulgaria. The research questions are the following:

> RQ1: Why does commercial TV represent a variable with explanatory function in Romanian and Bulgarian media landscapes?

RQ2: What are the central features of commercial TV in Romania and Bulgaria?

RQ3: What are the differences and similarities between the two East European TV models?

RQ4: Which approach is proper for understanding the realities of commercial TV in both countries within the Hallin and Mancini framework?

3.2. The Methodology

The research is explorative and descriptive (Babbie, 2020), using secondary analysis, recognized for its validity in similar social-historical contexts such as post-communism in Romania and Bulgaria. The secondary analysis frame was used to select, adjust, and (re)combine similar data series from primary/official sources to reframe the commercial TV field in both countries. The data gathering (conducted between July and September 2023) focused on three major dimensions suggested by previous research on Hallin and Mancini (2004): broadcasting system and media market, political factor and media system, and media professionalization.

For data about the broadcasting system and media market in Romania, the annual reports from 2002–2023 of the National Audiovisual Council of Romania (Consiliul Național al Audiovizualului [CNA], n.d.) represented the major source of information. The legal framework—Law 48/1992, 504/2002 (Parlamentul României, 1992, 2002), Decision 220/2011, and Decision 320/2012 (Consiliul Național al Audiovizualului, 2011, 2012)—was also analyzed. The technical infrastructure and content formats were also informed by CNA annual reports (CNA, n.d.). Main categories extracted: TV licenses (number/years, radio-TV licenses), legal functioning (authorization decisions, retransmission approvals), and types of broadcasting (TV): cable TV, terrestrial TV, and satellite TV (CNA, n.d., 2024). We gathered data on the media market from Initiative Media (2022, 2023) reports. From specialized media, we took information on the TV industry (Ghițulescu & Noel, 2007; "Marca Florin Calinescu," 2001). A recent country report (Meza et al., 2023) was used to present data on TV consumption and media concentration. For Bulgaria's broadcasting system, we extracted data from the official website of the Council of Electronic Media (n.d.) and the National Statistics Institute Bulgaria (2022). The media market was presented with data from the Bulgarian Association of Communication Agencies (BACA) and other European sources (BACA, 2023; Eurobarometer, 2022; GK Services, 2022).

For both countries, the second variable (political factor) was informed by NGO reports (Active Watch, 2023; Antonov, 2023; "Structurile de proprietate," 2007; Open Society Institute, 2005, 2008; Valkov, 2020, 2022) and by Euromedia Ownership Monitor reports (Meza et al., 2023; Zankova & Tsoncheva, 2023). We used the Freedom House reports to understand the features of media professionalization in Romania and Bulgaria (Freedom House, 2022, 2023).

In addition, one of the Romanian authors conducted 10 non-structured interviews with key players in TV (newsroom managers, top TV journalists) in Romania during 2018–2019, published in a Romanian book (Bălășescu, 2021), using the methodological frame of "récit de vie" (Bertaux, 2010) and unstructured interview (Babbie, 2020). The interviews were contextually used for specific information connected to the dimensions of Hallin and Mancini's model (such as access to the profession, state control, organizational culture, owners-employees relation, the political factors, the commercialization of TV, the balance of news-entertainment, the advertising and TV market, and the journalistic values). The interviews offered a

unique critical inside perspective on the TV system, giving background for historical milestones, structural-functional indicators, the political (internal and external) factors, and professionals' self-representation. The political frame appeared to be dominant in TV.

3.3. Aspects Related to the Technical Field and Regulatory Framework

3.3.1. Romania's Case

Founded in 1992, the CNA acts as the regulatory body for the TV industry, overseeing its development. The first Romanian audiovisual law was also issued in 1992 (Parlamentul Romaniei, 1992). In the first years, the "legislators had no idea about how the media legislation was supposed to look like" (Centrul pentru Jurnalism Independent, 2007, p. 4). As one of the first members of CNA recalls, the regulatory framework was built from scratch when private channels appeared on the market (Bălășescu, 2021, pp. 30–31). In 2002, Romania closed The Culture and Audiovisual Politics chapter of the European Directive—Television With No Borders—by reviewing the audiovisual law (Parlamentul României, 2002).

The Romanian audiovisual strategy was to encourage a diverse TV offer and a national system aligned with the European framework. In the annual report of 2002 (CNA, n.d.), CNA reported the first signs of economic interest in the TV market. The market experienced a dynamic evolution from zero private/commercial TV stations to hundreds, making it one of CEE's most developed audiovisual markets (Boshnakova & Dankova, 2023; CNA, n.d.).

The EU pre-integration years were marked by cable TV, which experienced a local and regional "blossoming" (CNA, n.d.). According to official data, the configured system has been diverse, stable, and mature since 2015 (Figure 1). The licenses were granted for nine years, so there were two main periods: 2002–2005, when all channels were granted licenses on a well-defined frame, and 2015–present when all channels were supposed to continue their activity by getting re-licensed under well-defined conditions.
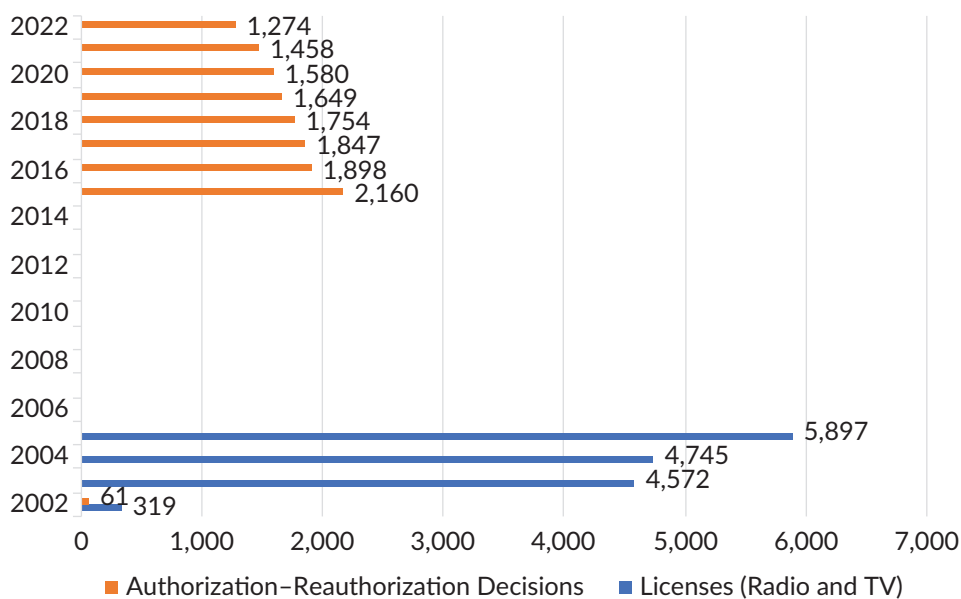

Figure 1. The Romanian audiovisual framework: radio and TV (2002–2022).

Technically, the liberalization of telecommunications services in 2003 and the introduction of optical fiber in cable networks allowed the entrance into the market of pay TV programs and integrated packages of TV content, telecommunications, and the internet (Consiliul Național al Audiovizualului, 2012). The national audience measurement system was introduced in 2004. Between 2006–2012, new digital systems (DTH, IPTV, TV cable, web TV, and TV on internet services) were introduced, which started the transition from analog to digital terrestrial signal transmission.

At the content level, in 2011, the Regulatory Code of Audiovisual Content was introduced (Consiliul Național al Audiovizualului, 2011), which established the normative environment for pluralism, free expression, and other democratic values. Nevertheless, CNA was confronted with many direct or indirect violations of the regulatory code. In 2018, for example, the activity of CNA consisted of 989 monitoring reports on 50 TV channels with 10,762 hours of content (CNA, 2018, p. 11, 84). In 2022, CNA monitored 45 TV stations' programs, 3,993 TV programs, and 4,221 broadcasted hours, releasing 1,318 monitoring reports (CNA, 2022, p. 80). The interest in TV is high in Romania: In 2014, the Romanian media reported 2,500 news reports about CNA's activity (CNA, 2014), and in 2022, approximately 990 media reports (CNA, 2022). As CNA reports:

> Between 1992 and 2022, 1,672 audiovisual licenses were granted for terrestrial and electronic communications networks (including satellite) broadcasting of television program services. Of these, at the end of 2022, 334 audiovisual licenses were in force for terrestrial digital broadcasting and through electronic communications networks (including satellite) of television program services owned by 205 companies in 89 localities distributed in all the counties of the country, including Bucharest. (CNA, 2022, p. 30)

The first Romanian private TVs were granted licenses in the early 1990s, but the field's main development in terms of licensed programs took place between 2010 and 2020 (see Figure 2).
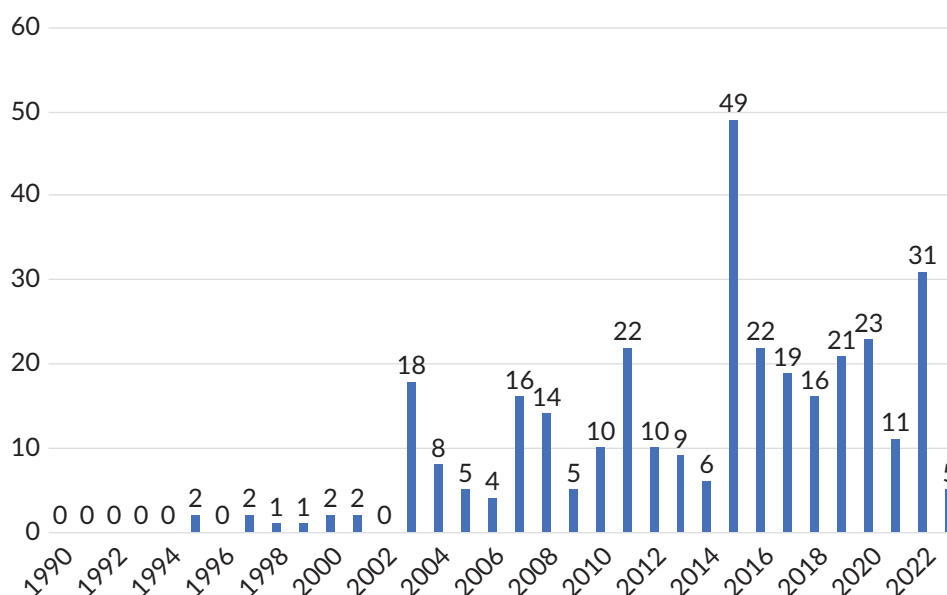
Figure 2. Romania TV licenses for programs' distribution (1990–2022).

Cable TV of the early 2000s could be considered the real beginning of TV as a player in the media market. Currently, the three forms of TV in Romania are cable, terrestrial, and satellite in various technical parameters of programs' distribution (SD, HD, DVBT, VHD, HD, 3K; CNA, 2022, p. 22). Up-to-date technology improved the distribution networks and led to the diversification of services. The Romanian territory is fully covered by at least one form of TV. The major cities are poles of electronic networks for signal transmission. According to data, cable TV still represents a national characteristic (Figure 3).
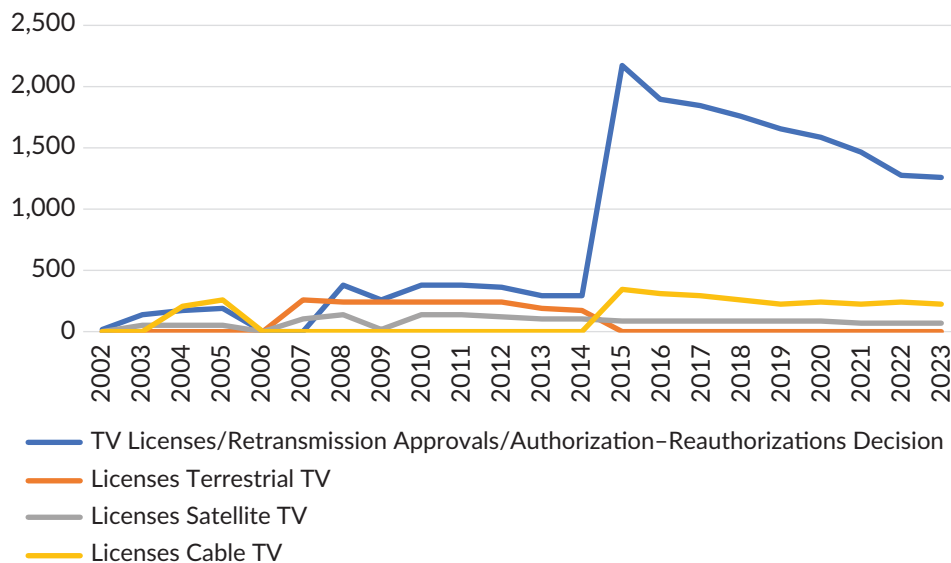

Figure 3. Romania: terrestrial, satellite, and cable TV by legal framework.

3.3.2. Bulgaria's Case

In Bulgaria, the Law on Television and Radio was issued in 1998. The Council for Electronic Media faced political interference and pressure from commercial channels, making its activity irrelevant. The audiovisual regulator was involved in several significant socio-political scandals (including the licensing of the first private national TV in 2000). The Law on Television and Radio has been continuously changed (most recently in 2022)—it regulates the functioning of public and private TV stations. Important changes were made in 2010 when product placement in TV content became regulated. After that amendment, the production of Bulgarian TV films and TV series by private TV stations began to explode (from 1989–2010, six TV series on private channels). In 2010, the requirement that independent producers shall not provide the same operator with more than two external productions simultaneously was eliminated, which opened the way for TV stations to potentially become dependent on certain producers (Figure 4).

The ban on owners of advertising agencies being involved in the property of electronic media was also removed. It is argued that the first private national TV (BTV) had a hidden ownership from the very beginning through the owner's consultant and the most powerful person in TV advertising, Krassimir Gergov (Spassov, 2012, p. 35). The same person obtained 80 out of 100 available TV frequencies, only based on the volume of advertising during 2009–2011. Gergov is also involved in TV ratings companies (foreign co-owners), which reportedly distorted data for TV ratings targeting advertising profits. In 2012, TV stations expressed their public dissatisfaction with that situation (Etrud, 2012). Until 2020, private TV broadcast
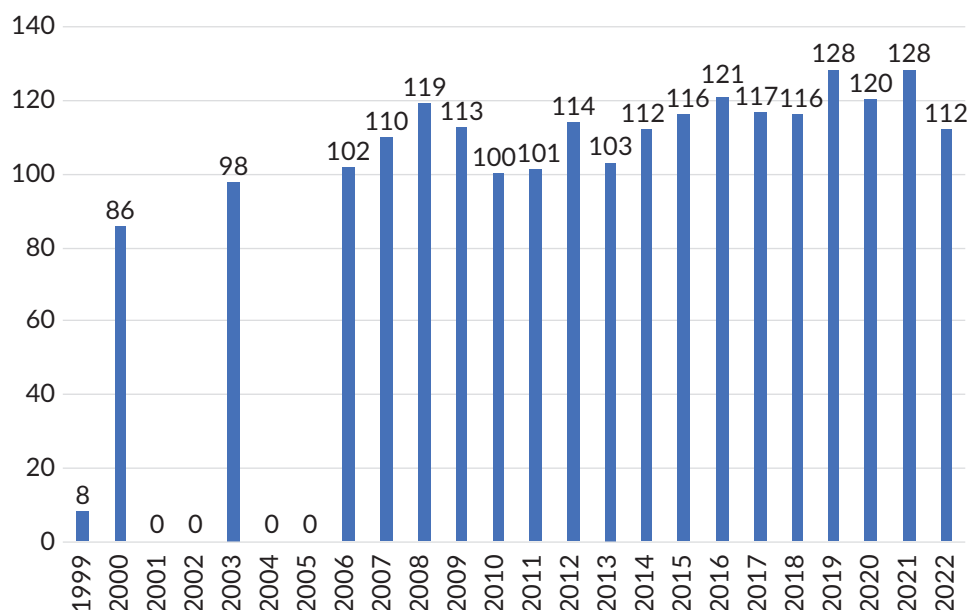
Figure 4. Bulgaria TV licenses for programs' distribution (1999–2022). Note: 2001, 2002, 2004, and 2005 data are not available.

gambling was not regulated by the Law on Television and Radio. Through gambling, knots of political, media, and business influence were entangled, which also affected the TV content: "According to statistics, in the last six years, the three national TVs received over BGN 182.8 million from hidden gambling advertising, although it was officially prohibited" (Mitov, 2020).

3.4. The Market: Illustrative Elements

3.4.1. Romania's Case

In 2022, economic growth in Romania increased by 4.8% (Institutul Național de Statistică, 2023), and the media market reached a total of €657 million (Initiative Media, 2023, p. 12), being considered "stable and predictable both in terms of demand and revenues" (Initiative Media, 2023, p. 38). The TV market attained €350 million for a second year, although there are indicators of an "audience erosion" (Initiative Media, 2023, p. 38). In 2022, the top three TV stations were all commercial and generalist: Pro TV, the market leader, with a broader spectrum of target audiences; Antena 1, with a consistent editorial long-term strategy; and Kanal D, with a prominent female audience and broad national coverage. They are followed by three news stations (Romania TV, Antena 3 CNN, Digi 24) and three thematic ones (Digi Sport 1, Happy Channel, and Antena Stars). TVR (public TV) is only in seventh place after commercial TV (Initiative Media, 2023, p. 15).

For 2022, according to CNA data analysis, TV channels are generalist (157) or niche channels: entertainment (82), information (50), and education/culture (20; see Figure 5).

Almost 96% of the budgets for TV are provided by 10 industries: healthcare, retail (food and beverages), cosmetics and personal care, eCommerce, telecommunications, betting and gambling, household products, financial services, and HoReCa (Initiative Media, 2022, p. 17).
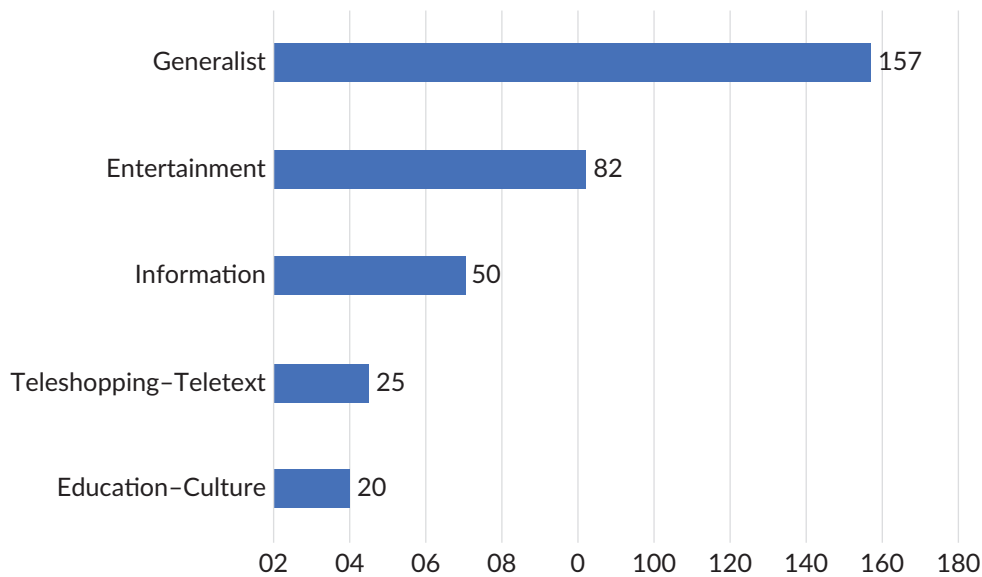
Figure 5. Types of TV channels under the CNA license.

The first TV audience measurements were made in the early 2000s, but only since 2014 has there been one national measurement entity. The Romanians are heavy TV viewers, with around five hours daily (Statista, 2021). TV dominates as the primary news source, at 5% above the European average, and the TV distribution market is considered to have a "high concentration" with an index of 5.041 (Herfindahl-Hirschman index; Meza et al., 2023).

3.4.2. Bulgaria's Case

Bulgaria's economy is presented as a "neoliberal laboratory" (Marinos, 2023, p. 17). After BACA (2023), advertising investments in the media market (2022) were about €234 million, with TV being the first with a 53.6% share. In 2022, Nova TV had a 54.6% market share, BTV 37.7%, and BNT 1.6% (GK Services, 2022).

At present, TV is the main news source for 86% of the public (on average, 75% for the EU). The private TV channels are more popular than public TV (Eurobarometer, 2022). According to the Reuters Institute of the University of Oxford for 2023 (Antonov, 2023), TV news is ranked by consumption as follows: Nova TV (61%), BTV (59%), BNT (37%), Nova News (27%), Bulgaria on Air (14%), Euronews Bulgaria (9%), 7/8 TV (6%). Trust in media news stands at 28%, ranking 41st out of 46 market surveys. The audience share by TV groups (generalist and niche channels) is Nova Group (45.9%), BTV Group (31.3%), Discovery (7.2%), BNT (6.4%), and others (9.2%; GK Services, 2022). The public BNT is in third place.

In terms of signal transmission, the dominant forms in Bulgaria are cable and satellite (Figure 6).

According to the National Statistics Institute Bulgaria (2022), there are 112 TV operators. Among them, providing national coverage, there is public TV (BNT) with three channels: the private BTV, Nova Television, and Bulgaria On Air. BTV was founded in 2001 as the first private national TV channel by News Corp, and sold in 2010 to Central European Media Enterprises, before being resold in 2020 to PPF. Nova Television
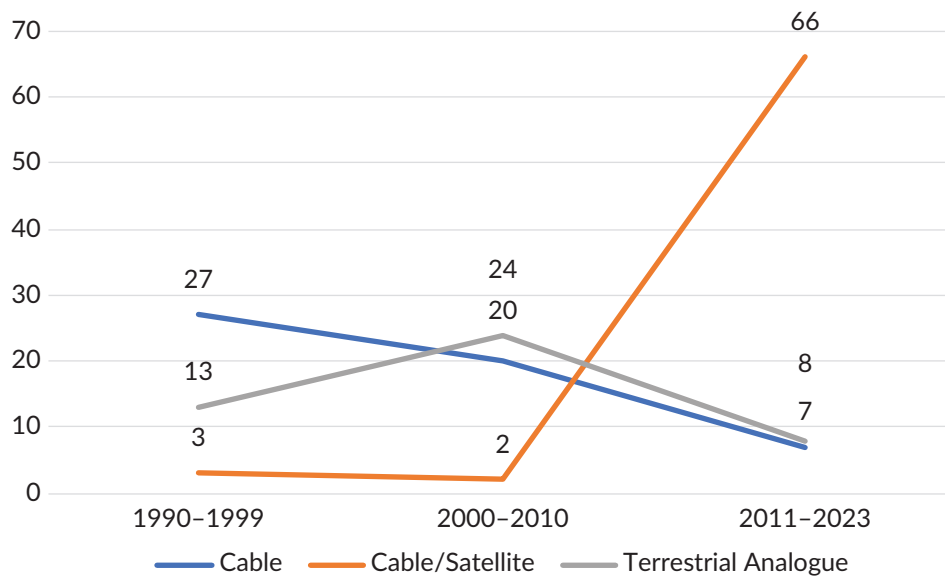
Figure 6. Bulgaria cable, cable/satellite, and terrestrial analogue TV.

was founded in 1994 as the first private broadcast TV in Sofia by Multimex ID. It was sold in 2000 to Antena TV, transforming it into a national TV channel (2003). In 2008, it was sold to Sweden's MTG, then to Advance Media Group (2019), and to United Group (2020). Bulgaria On Air was founded in 2011 as a national private TV (owned by Investor Media Group). Private TV surpassed public TV in viewership at the beginning of 2001, when the audience of BTV surpassed BNT on a national scale: BTV (32.2%), BNT (29.9%), Nova Television (3.9%; "Rating for February," 2001, p. 2). Since then, private TV stations categorically dominated.

Recent research shows that Romania and Bulgaria have the highest TV consumption in CEE. In Bulgaria, TV attracts more than 80% of the total advertising expenditure. Over 50% of people trust TV in both countries (Boshnakova & Dankova, 2023, p. 172).

3.5. Political Influence: Journalistic (De)Professionalization

3.5.1. Journalism: Profession, Professionalism, Professionalization

While journalism is generally considered "the business or the practice to produce and disseminate information about contemporary facts of public relevance and interest" (Schudson, 2003, p. 11), the term "professionalization" in journalism is still controversial. The studies (related to professional orientation and organizational frame) considered central in professionalization: the universal role of journalism, the mandatory mission of public information, and the ethical dimension (Allison, 1986, pp. 8–13). The influences that affect media organizations limit the autonomy of journalists, exposing them to vulnerabilities (Shoemaker & Reese, 1997). The new communicational set-up maintains the difficulty of framing various practices (multimedia techniques, online journalism, global distribution) within journalism's professionalization.

3.5.2. Romania's Case

The CNA currently regulates the political actors' presence in news programs and political debates during (non)electoral periods (Consiliul Național al Audiovizualului, 2011). Despite this, many violations of the law were observed and sanctioned. In 2018, for example, the CNA sanctioned 42 cases related to a lack of pluralism and freedom of expression (CNA, 2018, p. 86). Over the years, the CNA has presented unbalanced news coverage and biased political debates as a habit in the TV sector rather than isolated cases.

One of Romania's first private TV stations was Tele7abc, founded in 1994 as a generalist channel covering the Bucharest area. The journalists left public TV, especially for political reasons, such as the head of the news department, R.C., who was dismissed from the position of editor-in-chief. Back then, private channels came on the market with the promise of supporting Western values, democracy, pluralism, and freedom of speech. Their news agenda covered the relevant political spectrum to provide an informational alternative to the obedient voice of public TV (Bălășescu, 2021, pp. 23–62).

Pro TV, the market leader since its launch in 1995, is 100% branded as commercial TV focused on entertainment/infotainment. In the early 2000s, it got involved in public agenda setting by producing a TV show, Chestiunea Zilei (translated to Topic of the Day), one of the most successful in terms of audience ("Marca Florin Calinescu," 2001). The show moderator, F.C., a well-known Romanian actor, became involved in politics after leaving TV and ran for the Bucharest City Hall elections.

In the 2000s, the commercial TV landscape also included the first news channels with ownership connected to the political field: "Most of the major media owners have close connection with business or political circles" (Open Society Institute, 2008, p. 36). According to the Centre for Independent Journalism, media concentration determined an almost "incestuous relationship between media and politics....Media owners use media operations to promote and disseminate the political opinions and exploited the politicians to reach the corporate goals" ("Structurile de proprietate," 2007, para. 1). More recently, the media investigations and NGO reports presented the direct links between public money and media (Active Watch, 2023, p. 6):

> The cohabitation between the media and politics is long-standing. In the recent history of the media, there have been numerous episodes in which some media institutions turned into simple PR or political marketing agencies and were instrumentalized to serve partisan interests at the expense of the public interest. (Active Watch, 2023, pp. 11–12)

Many journalists oscillated between journalism and politics. The former mayor of Bucharest (G.F.), a former radio journalist and moderator at public TV (in the 1990s), became the spokesperson of the prime minister (in the 2000s) and returned to TV as a news anchor and moderator. In 2016, she won the elections for Bucharest City Hall. The case of a leading journalist of a private news channel (R.B.) who became vice-president of the Liberal Party and won the European Parliamentary mandate is relevant, too.

In Romania, the news TVs, always placed around the top 10 most watched channels, became very active in setting the public agenda, supporting or criticizing the government mostly from the perspective of one side. For example, in the case of Romanian street protests from August 2018, the news coverage on commercial

TV was mostly biased. The Romanian society was polarized for or against the prime minister of the left government. A study on TV coverage of the protests showed a distorted perspective, arguing the political bias in the protests' coverage on two prominent commercial news channels. It represents a good illustration of the lack of pluralism and balance in news reporting. The polarized TV coverage may have contributed to the polarized public opinion (Bălășescu, 2019).

3.5.3. Bulgaria's Case

In the Bulgarian legislation, there is no explicit ban on allowing TV stations to become "mouthpieces" of political parties. One example is TV SKAT, founded in 1992 as a regional cable TV channel. It broadcast the TV program *Attack*, whose moderator founded a nationalist party with the same name in 2005 and entered the Parliament. In 2009, the leader of *Attack* left TV Skat and started Alfa TV, which was initially registered as a public broadcaster.TV Skat remains the party TV of the National Front for the Salvation of Bulgaria (nationalists), which managed to join the Parliament (2014 and 2017) and the coalition government (2017–2021). Other examples include Bulgaria 24, founded in 2014 as a national polythematic cable private TV, close to Bulgarsko Natsionalno Dvizhenie-VMRO (nationalists); Bulgarian Free Television, founded in 2019 and owned by the Bulgarian Socialist Party (formerly BKP); and 7/8 TV, a private cable/satellite pay-TV with national reach, affiliated with the "7/8" political party, represented in the Parliament, and winner of the parliamentary elections (July 2021). The political interference in commercial TV can be divided between (a) conflict of interest and roles (confusion among TV hosts and politicians) and (b) political pressures.

Regarding the conflict of interest and roles, from the 1990s, TV popularity was used as a political resource. The audience's interests are harmed because of the distorted coverage of reality. One case refers to the host of the morning show on BTV, who left public TV for the private TV 7, around which the party Bulgaria Without Censorship was formed. He eventually became an MEP (2014–2019). In 2014, another BTV host announced "on air" that he was starting a political career in Bulgaria Without Censorship. In 2019, the most popular TV showman also announced "on air" the departure of his team from BTV (after several shows suspended by the management for political reasons). He later founded 7/8 TV and entered politics. In 2023, the director of news and current affairs at BTV announced that he would be a candidate for one of the leading political parties (Citizens for European Development of Bulgaria).

As for political pressures, the increasing influence of private TV stations (from 2001) also increased the frequency of the cases of political pressure on journalists and TV hosts. One example, which happened in 2022, refers to the former head of news at BTV, who admitted that he faced political pressure during his management (2014–2020) of the Citizens for European Development of Bulgaria party ("Godini nared bTV," 2022). Although political interference cannot be directly proven, it is considered intimidation of journalists and is talked about in professional circles and among the public. The international media owners of the main players do not guarantee the independence of journalism but open new directions of analysis for their hidden political connections with local leaders. This process first started with the newspapers and the monopolization of the market by the German newspaper company WAZ (in Bulgaria, between 1997–2010), which then extended to TV. The mechanisms for political power over TV, the "captured media" (Mitov, 2020), operate through advertising contracts, owners close to political leaders, gambling, sports, and banks (Mitov, 2020).

The examples from Romania and Bulgaria were selected from a broader spectrum of situations that raise obvious dilemmas related to values of editorial independence, political autonomy, ethics, and access to resources as power exercises. They could be taken as evidence of the party's colonization of the media, as argued by Bajomi-Lázár (2014, p. 29). TV journalism is heterogeneous, with tension between national vs. local and between professional roles such as anchor vs. reporter. At the same time, TV journalism is negatively affected by external factors (politics, ownership, infotainment) and internal ones (the belief that journalism requires talent and "hands-on" experience, access to the profession by influence networks, and low-standard content). The lack of solidarity among journalists adds a negative factor to professional vulnerability. The journalists' social perception changed from heroes of democracy (in the 1990s) to employees on the market after the 2000s (Avădani, 2017).

4. Discussion

We analyzed the commercial TV from Romania and Bulgaria using the dimensions considered by the Hallin and Mancini model as relevant for understanding the media system: regulatory framework, technical field, market, political influence, and aspects of professionalization in journalism. The findings showed a rapid post-1989 evolution, a well-developed technical infrastructure, the diversity of TV formats and contents due to high levels of TV consumption, and technological alignment to digitization. The 1990s context was favorable for commercial TV development in both countries due to the rejection of communist "paternal" relations between the state and TV and the public "appetite" for media consumption. Born under the profit logic, commercial TV became the most developed media in a few years, surpassing public TV by far. In parallel with its effervescent development, the institutions regulating the audiovisual were founded in both countries. Based on liberal values, the regulators were less efficient in monitoring and sanctioning. Commercial TV contributed to the development of post-1989 societies and their polarization because political interference was not limited to public TV. There are strong indications of political bias within the content of commercial TV (news bulletins, debates), with a high potential effect on social and political polarization.

Considering the central aspects of commercial TV in Romania and Bulgaria, we argue that it constitutes a blind spot in media research. Although Hallin and Mancini (2004) focused on public TV, we showed that commercial TV could have an explanatory function in describing the media model after 1989. TV represented a "primary definer" (Hall et al., 1978) of the democratic realities and the main source of information during the last three decades.

The historical development of both countries shares more similarities than differences. The Romanian and Bulgarian media industries saw explosive development around the year 2000. Since then, it has continued to acquire the systemic elements that contributed to the irreversible replacement of state TV by a pluralist spectrum of TV channels that claimed to provide unbiased coverage of public affairs. Despite the viewership statistics that indicate a relatively stable audience distributed across urban and rural populations (BACA, 2023; Initiative Media, 2022), commercial TV is confronted nowadays with the challenges of maintaining its audience level in the social media context of attracting younger audiences and adapting to a fragmented media market.

Situated at the crossroads of post-communist regimes and EU directions, Romania and Bulgaria are considered dynamic TV markets in CEE, reportedly pluralist and based on free competition. However, commercial TV

is exposed in many ways to political factors and economic pressures underlying the limits of the national advertising markets and regulatory institutions. The relevant difference between Romania and Bulgaria is the degree of political involvement and the financial pressures on private TV. The Romanian market, larger than Bulgaria's, benefitted from the earlier implementation of internationally audited audience measurement.

We argue that the future analysis of both countries should consider commercial TV due to the prominence of electronic media in the public space and the centrality of commercial TV in audience and advertising companies' preferences. The mix between the political field and journalism is also present at the level of commercial TV, not only in print media and public broadcasting, as underlined by Hallin and Mancini's model. TV journalism is vulnerable regarding professional norms, values, and procedures. A pluralist TV market, regulated by national and European legislation, does not guarantee journalists' autonomy. The political elites are still interested in exerting influence over private TV because of the high audience rates.

The original model of Hallin and Mancini (2004) played an important role in the analysis of public audiovisual and neglected commercial TV, most probably because of its secondary position compared to public TV in the 1980s in Western Europe (Bourdon, 2011) or its focus on entertainment (considered to be a sort of "second-hand" content in the normative perspective of TV). Our argument builds on considering commercial TV as a dimension to broaden the research on comparative emerging media systems such as Romania and Bulgaria.

The polarized pluralist/Mediterranean model was initially considered to have the most explanatory power in emerging media systems because of the political integration of media and low level of professionalism. Previous research—less academic and more "think thank" directed—criticized commercial TV and ignored its relevance as a social actor and the biggest player in the media market. The Hallin and Mancini model served as a comparative pattern but had its "procrustean" limits that prevented the analysis of critical aspects of modern TV in the context of global business, production, and distribution.

Hallin and Mancini's framework was used to analyze the media landscape in Romania and Bulgaria. Indzhov (2021) discussed the state funding of media, including advertising, and argued that the media system had visible similarities with the polarized pluralist/Mediterranean model and several marks of the liberal model. Furthermore, Indzhov (2021) found the "captured media" concept more adequate to explain clientelism and media corruption. Petrova (2023) also underlined the hybrid character of the media system, but she went rather to revitalizing the authoritarian model of Siebert et al. (1956). Marinos and Spassov (2023, p. 14) concluded that "the same big media companies entered the countries of Southeastern Europe and imposed the same standards and content." In Romania, private media channels, alongside the public TV and radio, supported the "government narratives," while the whole media sector bore the influence of political and economic interests (Boshnakova & Dankova, 2023, p. 178).

TV distribution and access to TV technologies, as well as the emphasis on free and global market values, open the way for considering elements from the liberal model (commercial media) and the democratic corporatist model (the co-existence of commercial media with the social and political interdependent media; Maniou, 2023, p. 1940) in proposing a tweaking of the polarized pluralist/Mediterranean model.

5. Conclusion

Commercial TV is less explored in its systemic dimension in CEE, even though it has replaced public TV from its first-place position as a source of information and "window" to the world. In Romania and Bulgaria, commercial TV represents one of the most important dimensions of the media system, considering the market factors (consumption figures and advertising expenditures) and the systemic features (technological requirements, global networks of production and distribution, and integrated business models). Its development was influenced by the structural "void" of the post-communist emerging media system, a tremendous social need for information, and the politicians' interest in media. In only a few decades, TV "burnt" historical milestones, effacing the public service model and rapidly adopting the commercial one. Nevertheless, even in commercial TV, political influence remained strong, and this could be considered a feature of the media in both countries, partly due to ownership concentration and the need to control access to important audiences.

Our study aimed to fill in the blind spot of media research on Romanian and Bulgarian TV by offering a critical perspective on its relation to the polarized pluralist/Mediterranean model of Hallin and Mancini (2004). We argue that commercial TV should be considered a dimension with an explanatory function within CEE media systems' analysis. The features of commercial TV displayed in Romania and Bulgaria (ideologically homogeneous, driven by profit, and influenced by politics) led to the necessity of critically assessing the polarized pluralist/Mediterranean model to explain the 21st-century context. We open the way for considering elements from the liberal and democratic corporatist models for future analysis of both countries and advocate for the critical assessment of the polarized pluralist/Mediterranean model in CEE countries.

Acknowledgments

Conflict of Interests

The authors declare no conflict of interests.

References

Active Watch. (2023). *Partidele, banii și presa, o relație toxică*. https://activewatch.ro/articole/partidele-banii-si-presa-o-relatie-toxica-freeex-digest-nr-4

Allison, M. (1986). A literature review of approaches to the professionalism of journalists. *Journal of Mass Media Ethics*, *1*(2), 5–19. https://doi.org/10.1080/08900528609358262

Antonov, S. (2023). *Bulgaria*. Reuters Institute. https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2023/bulgaria

Avădani, I. (2017). Of journalists and money: The employment of journalists in Romania and its influence on media freedom and quality. *International Journal of Communication*, *11*, 1975–1997.

Babbie, E. R. (2020). *The practice of social research*. Cengage.

Badenoch, A., Fickers, A., & Henrich-Franke, C. (Eds.). (2013). *Broadcasting and the Cold War: Some preliminary results*. Nomos.

Bajomi-Lázár, P. (2014). *Party colonisation of the media in Central and Eastern Europe*. CEU Press.

Bakardjieva, M. (1995). The new media landscape in Bulgaria. *Canadian Journal of Communication, 20*(1). https://doi.org/10.22230/cjc.1995v20n1a845

Bălășescu, M. (2019, August 20-23). Romanian protests from 10 to 12 August 2018. The radiography of a momentum of the Romanian hyber-nation [Paper presentation]. 14th ESA Conference: Europe and beyond—Boundaries, barriers, and belonging, Manchester, UK.

Bălășescu, M. (2021). *Televiziune în estul sălbatic: 30 de ani în 10 dialoguri*. Meridiane Publishing.

Bertaux, D. (2010). *Le récit de vie: L'enquête et ses méthodes* (3rd ed.). Armand Collin.

Bignell, J., & Fickers, A. (Eds.). (2008). *A European television history*. Blackwell.

Boshnakova, D., & Dankova, D. (2023). The media in Eastern Europe. In S. Papathanassopoulos & A. Miconi (Eds.), *The media systems in Europe: Continuities and discontinuities* (pp. 163–190). Springer.

Bourdon, J. (2011). *Du service public à la télé-réalité: Une histoire culturelle des televisions européens 1950–2010*. INA Editions.

Brüggemann, M., Engesser, S., Büchel, F., Humprecht, E., & Castro, L. (2014). Hallin and Mancini revisited: Four empirical types of Western media systems. *Journal of Communication, 64*(6), 1037–1065. https://doi.org/10.1111/jcom.12127

Bulgarian Association of Communication Agencies. (2023). *Media market*. https://www.baca.bg/wp-content/uploads/2023/06/2023_BACA_Media_Market-eng.pdf

Casey, B., Casey, N., Calvert, B., French, L., & Lewis, J. (2008). *Television studies: The key concepts* (2nd ed.). Routledge.

Castro Herrero, L., Humprecht, E., Engesser, S., Brüggemann, M., & Büchel, F. (2017). Rethinking Hallin and Mancini beyond the West: An analysis of media systems in Central and Eastern Europe. *International Journal of Communication, 11*, 4797–4823. https://ijoc.org/index.php/ijoc/article/view/6035

Centrul pentru Jurnalism Independent. (2007). *Structurile de proprietate și influența lor asupra independenței și pluralismului în mass-media*. https://cji.ro/structurile-de-proprietate-si-influenta-lor-asupra-independentei-si-pluralismului-in-mass-media-2

Consiliul Național al Audiovizualului. (n.d.). *Rapoarte anuale: O prezentare a rapoartelor anuale privind activitatea CNA*. https://www.cna.ro/-Rapoarte-anuale-.html#pagination_art_last

Consiliul Național al Audiovizualului. (2011). *Decizie Nr. 220 din 24 februarie 2011 privind codul de reglementare a conținutului audiovizual*. https://www.cna.ro/DECIZIE-Nr-220-din-24-februarie.html

Consiliul Național al Audiovizualului. (2012). *Decizie nr. 320 din 29 mai 2012 privind furnizarea serviciilor media audiovizuale la cerere*. https://legislatie.just.ro/Public/DetaliiDocumentAfis/139226

Consiliul Național al Audiovizualului. (2014). *Raport de activitate pe anul 2014*. https://www.cna.ro/Raport-anual-2014.html

Consiliul Național al Audiovizualului. (2018). *Raport de activitate pe anul 2018*. https://www.cna.ro/Raport-anual-2018.html

Consiliul Național al Audiovizualului. (2022). *Raport de activitate pe anul 2022*. https://www.cna.ro/Raport-anual-2022.html

Consiliul Național al Audiovizualului. (2024). *Situații privind licențele audiovizuale, avizele de retransmisie, autorizațiile de retransmisie și avizele de furnizare a serviciilor media audiovizuale la cerere*. https://www.cna.ro/Situa-ii-privind-licen-ele,6771.html?debut_art_freres_01=10#pagination_art_freres_01

Council of Electronic Media. (n.d.). *Licensing and registration*. https://www.cem.bg/infoen/27

De Albuquerque, A. (2012). On models and margins: Comparative media models viewed from a Brazilian perspective. In D. C. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 72–95). Cambridge University Press.

Donders, K., Pauwels, C., & Loisen, J. (Eds.). (2013). *Private television in Western Europe: Content, markets, policies*. Palgrave MacMillan.

Eco, U. (2021). *Despre televiziune*. Polirom.

Etrud. (2012, January 17). *Televiziite na bunt sreshtu Krasimir Gergov*. https://etrud.blogspot.com/2012/01/blog-post_17.html

Eurobarometer. (2022). *Media & news survey 2022*. European Union. https://europa.eu/eurobarometer/surveys/detail/2832

Freedom House. (2022). *Freedom in the world: Romania*. https://freedomhouse.org/country/romania/freedom-world/2022

Freedom House. (2023). *Freedom in the world: Bulgaria*. https://freedomhouse.org/country/bulgaria/freedom-world/2023

Ghițulescu, L., & Noel, M. (2007). Lazarov TV. *Money Express*, *17*, 13–21.

GK Services. (2022). *Promeni v televizionnia reklamen pazar prez parvata polovina na 2022 g*. https://bg-gkservices.com/tv-reklama-h12022

Gross, P. (2023). *The cultural core of media systems: The Romanian case*. Rowman & Littlefield.

Gross, P., & Jakubowicz, K. (2013). *Media transformations in the post-communist world: Eastern Europe's tortured path to change*. Lexington Books.

Hall, S., Critcher, C., Jefferson, T., Clarke, J., & Roberts, B. (1978). *Policing the crisis: Mugging, the state, and law and order*. Macmillan.

Hallin, D. C., & Mancini, P. (2004). *Comparing media systems*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (2010). Comparing media systems: A response to critics. *Media and Journalism*, *9*(2), 53–67.

Hallin, D. C., & Mancini, P. (2012). *Introduction*. In D. C. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 1–10). Cambridge University Press.

Hallin, D. C., & Mancini, P. (2017). Ten years after comparing media systems: What have we learned? *Political Communication*, *34*(2), 155–171. https://doi.org/10.1080/10584609.2016.1233158

Godini nared bTV e bila pod natisk ot GERB, razkri Venelin Petkov. (2022, November 10). *Mediapool*. https://www.mediapool.bg/godini-nared-btv-e-bila-pod-natisk-ot-gerb-razkri-venelin-petkov-news341787.html

Ibroscheva, E., & Stover, M. (2007). First green is always gold: An examination of the first private national channel in Bulgaria. In I. Blannkson & P. Murphy (Eds.), *Negotiating democracy: Media transformations in emerging democracies* (pp. 219–238). State University of New York Press.

Ibroscheva, E., & Stover, M. (2017). East meets West: The cultural history of television in Bulgaria. *Journal of European Television History and Culture*, *6*(11), 6–21. https://viewjournal.eu/articles/10.18146/2213-0969.2017.jethc119

Imre, A. (2016). *TV socialism*. Duke University Press.

Indzhov, I. (2021). The state and media financing: Bulgaria and the Mediterranean media model. *21st Century Media and Communications*, *5*(1), 7–21. https://doi.org/10.54664/ZKQL5823

Initiative Media. (2022). *Media fact book Romania: 2022*. https://www.mediafactbook.ro/#mbf2022

Initiative Media. (2023). *Media fact book Romania: 2023*. https://mediafactbook.ro

Institutul Național de Statistică. (2023). *In anul 2022, produsul intern brut a crescut, comparativ cu anul 2021, cu 4,7%*. https://insse.ro/cms/sites/default/files/com_presa/com_pdf/pib_tr4r2022_2.pdf

Iosifidis, P. (2007). *Public television in the digital era: Technological challenges and new strategies for Europe*. Palgrave Macmillan.

Livingstone, S. (2005). Media audiences, interpreters, users. In M. Gillespie (Ed.), *Media audiences: Understanding media* (pp. 9–50). Open University Press. http://eprints.lse.ac.uk/9082

Maniou, T. A. (2023). The dynamics of influence on press freedom in different media systems: A comparative study. *Journalism Practice*, *17*(9), 1937–1961. https://www.tandfonline.com/doi/full/10.1080/17512786.2022.2030246

Marca Florin Calinescu valoreaza 1.5 milioane USD. (2001, October 4). *Capital*. https://www.capital.ro/marca-florin-calinescu-valoreaza15-milioane-usd-4991.html

Marinos, M. (2023). *Free to hate: How media liberalization enabled right-wing populism in post-1989 Bulgaria*. University of Illinois Press.

Marinos, M., & Spassov, O. (Eds.). (2023). Media and capitalism: Market, culture, power [Special issue]. *Southeastern Europe*, *47*(1).

McQuail, D. (1987). *Mass communication theory: An introduction* (2nd ed.). SAGE.

McRobbie, A. (1994). *Postmodernism and popular culture*. Routledge.

Meza, R., Mogos, A., Trofin, C., & Vincze, H. O. (2023). *Country report 2023*. Euromedia Ownership Monitor. https://media-ownership.eu/findings/countries/romania

Mitov, B. (2020, May 21). "Prevzetata darzhava ima i prevzeti medii." Kak modelat "palen saport" proizvezhda propagandni mashini. *Svobodna Evropa*. https://www.svobodnaevropa.bg/a/30622371.html

Mustață, D. (2012). Television in the age of (post) communism: The case of Romania. *Journal of Popular Film and Television*, *40*(3), 131–140. https://doi.org/10.1080/01956051.2012.697794

National Statistics Institute Bulgaria. (2022). *Televizionni operatori*. https://nsi.bg/bg/content/3646/61-телевизионни-оператори

Open Society Institute. (2005). *Television across Europe: Regulation, policy and independence*.

Open Society Institute. (2008). *Television across Europe: Follow-up reports 2008*.

Parlamentul României. (1992). *LEGE nr. 48 din 21 mai 1992—Legea audiovizualului*. https://www.cdep.ro/pls/legis/legis_pck.htp_act_text?idt=12094

Parlamentul României. (2002). *Lege nr. 504 din 11 iulie 2002*. https://www.cdep.ro/pls/legis/legis_pck.htp_act?ida=38558

Petrova, V. (2023). Media systems and crises: The signal stopping of the "horizont" program on the Bulgarian national radio on September 13, 2019. *Medialog*, *14*, 50–65. https://www.medialog-bg.com/?p=4893

Rating for February. (2001, March). *Media World Magazine*, 1-16.

Roel, M. (2008). Audiovisual digitalization in Spain and Italy: From neo-television to post-television. *Observatorio*, *2*(1), 95–112. https://obs.obercom.pt/index.php/obs/article/view/87

Schudson, M. (2003). *The sociology of news*. W. W. Norton.

Scolari, C. A. (2009). The grammar of hypertelevision: An identikit of convergence-age fiction television (or, how television simulates new interactive media). *Journal of Visual Literacy*, *28*(1), 28–50. https://doi.org/10.1080/23796529.2009.11674658

Shoemaker, P. J., & Reese, S. D. (1997). *Mediating the message: Theories of influences on mass media content* (2nd ed.). Longman.

Siebert, F. S., Peterson, T., & Schram, W. (1956). *Four theories of the press: The authoritarian, libertarian, social responsibility, and soviet communist concepts of what the press should be and do*. University of Illinois Press.

Sparks, C. (1995). Introduction: The emerging media systems of post-communism. *Javnost—The Public*, *2*(3), 7–17. https://doi.org/10.1080/13183222.1995.11008597

Spassov, O. (Ed.). (2012). *Balkan media barometer: Bulgaria 2012*. Fridrich-Ebert-Stiftung.

Statista. (2021). *Average time spent watching television daily in European countries in 2021*. https://www.statista.com/statistics/422719/tv-daily-viewing-time-europe

Structurile de proprietate și influența lor asupra independenței și pluralismului în mass-media. (2007, July 7). *Centrul Pentru Jurnalism Independent*. https://cji.ro/structurile-de-proprietate-si-influenta-lor-asupra-independentei-si-pluralismului-in-mass-media-2

Tambini, D. (2020). *Media freedom, regulation and trust: A systemic approach to information disorder*. Council of Europe. https://rm.coe.int/cyprus-2020-new-media/16809a524f

Valkov, I. (2020). *Journalism without a mask: Annual survey of media freedom in Bulgaria*. Association of European Journalists Bulgaria. https://aej-bulgaria.org/wp-content/uploads/2020/10/Journalism-without-a-Mask-2020-Annual-Survey-Of-Media-Freedom-in-Bulgaria.pdf

Valkov, I. (2022). *Media under fire: For more editorial responsibility*. Association of European Journalists Bulgaria. https://aej-bulgaria.org/wp-content/uploads/2022/10/Media-under-fire_EN.pdf

Zankova, B., & Tsoncheva, R. (2023). *Country report 2023*. Euromedia Ownership Monitor. https://media-ownership.eu/findings/countries/bulgaria

About the Authors

Mădălina Bălășescu is a senior lecturer in the Department of Cultural Anthropology and Communication at the University of Bucharest. Her academic interests include the media system, television, public communication, and their relations with public space within transitional, post-communist contexts. Mădălina's educational background in media sociology and psychology of communication is professionally used to better understand media (television) culture in its development within information society and its challenges, with a special interest in its contribution to the social and individual reality construction.

Vyara Angelova (DSc) is a professor at the Faculty of Journalism and Mass Communication at Sofia University St. Kliment Ohridski. Her main research topics include radio journalism, the history of broadcasting, and media ethics. Vyara is the author of three books: *Social Minorities and Media*, *World Radio: Models of Development*, *Bulgarian Socialist Radio (1944–1989)*, and an editor of eight scientific series.

Romina Surugiu is an associate professor of journalism and media studies and dean of the Faculty of Journalism and Communication Studies at the University of Bucharest. She holds an MA in gender studies, an MA in labor studies, and a PhD in philosophy. She has worked as a postdoctoral researcher in communication studies at the University of Bucharest (2010–2013) and Uppsala University (2012). She has also worked as a journalist and served as a board member of Romanian Public Television. She is a board member of the European Sociological Association—Research Network 18: Sociology of Communications and Media Research.

ARTICLE

The Romanian Media System: Dynamics, Challenges, and Implications for Democracy

Madalina Botan

College of Communication and Public Relations, National University of Political Studies and Public Administration (SNSPA), Romania

Correspondence: Madalina Botan (madalina.botan@comunicare.ro)

Abstract

This article endeavors to delve into the recent transformation of the Romanian media landscape, aiming to offer a nuanced comprehension of the cultural and political dynamics that have influenced journalistic practices. The Romanian media environment has undergone swift changes, transitioning from a monolithic structure to one increasingly driven by commercial interests, all while navigating economic and political pressures. The shift toward a free-market framework has not only reshaped the social and political fabric but has also significantly impacted the media sector. This article posits that the Romanian media landscape is shaped by the interplay of cultural, economic, and political forces, evident in journalistic outputs across both traditional and digital platforms. This assertion aligns with Hallin and Mancini's (2004) notion of parallelism between journalism and politics. Moreover, it extends this perspective to encompass cultural influences and the evolving media landscape resulting from shifts in the media market, changing consumption patterns, and the proliferation of digital media. Key indicators such as professional standards, editorial autonomy, transparency, financial sustainability, political influence, and media regulations are critically examined within the unique context of Romania, in which political interference and growing reliance on advertising revenue often curtail editorial independence. In conclusion, the article reflects on the current state of the Romanian media system and the manifold challenges it confronts amidst the changing dynamics of the media landscape.

Keywords

advertising money; Eastern Europe; editorial independence; journalism; media consumption; media regulations; media systems; media trust; political interventionism; Romania

---

1. Introduction

Media systems are in a constant state of flux, and Romania serves as a prime example of this phenomenon. While sharing similarities with neighboring countries, this article contends that the Romanian media landscape warrants examination in its own right, rather than being lumped into a generalized category of Eastern European systems. Two primary factors support this assertion: the lack of historical homogeneity despite a shared communist past, and the distinctive political and social evolution witnessed over the past three decades.

The transition from communism to democracy precipitated significant shifts in the Romanian media sphere. The early 1990s saw a rapid privatization of media outlets, heralding the promise of a more democratic and unfettered press. However, compared to its Eastern European counterparts, Romania experienced divergent political and social trajectories, attributed in part to the absence of liberal elites and a robust civil society, as suggested by some scholars (I. Coman & Gross, 2012; Gross, 2019, 2023). In his examination of media systems through a cultural lens, Gross (2023) posits that media elites play a pivotal role in reinforcing certain values and beliefs, thereby shaping the overarching journalistic ethos. He contends that contemporary Romanian journalism is a product of the interplay between corruption, nationalism, and a perceived sense of "specialness" among Romanians (Gross, 2023, p. 67). While this article does not adopt a purely cultural approach to delineate the intricacies of the Romanian media landscape, it endeavors to elucidate the multifaceted influence of cultural, economic, and political factors on journalistic practices.

The Romanian media landscape has long been characterized by high levels of political influence, limited press freedom, and a weak public service broadcasting sector (Boshnakova & Dănkovă, 2023; Dobek-Ostrowska, 2012). Independent organizations monitoring media freedom, such as Reporters Without Borders, have noted a growing threat to media freedom in Romania in recent years (Reporters Without Borders, 2022). Furthermore, recent reports from entities like ActiveWatch (2023a; 2023b) and Transparency International (n.d.) highlight ongoing interference by politicians and their associates.

In our endeavor to assess the credibility and quality of journalistic reporting in Romania, my colleagues and I (Buturoiu et al., 2023) conducted qualitative research based on nine in-depth interviews with experts in April 2022. These experts included four politicians responsible for media regulations and five journalists and media professionals. Our findings revealed a concerning trend towards biased reporting within Romanian journalism. All interviewed media professionals noted widespread editorial alignment with specific commercial or political agendas, undermining public trust in media organizations and indicating a lack of commitment to journalistic ethics. Additionally, our research illuminated the inadequate training of journalists, exacerbating the overall lack of professionalization within the Romanian media system. Consistent with other studies (Lupu, 2021), our interviews with media professionals highlighted a lack of consensus regarding journalistic norms in the Romanian media industry, hindering collaboration among journalists and media institutions. Moreover, political and owner intervention in the editorial process emerged as a pervasive practice. Journalists and media professionals indicated that editorial content in Romania is largely influenced by media owners or the political leanings of media conglomerates (Buturoiu et al., 2023). These findings underscore the existence of biased journalistic practices and an overall media system lacking autonomy and editorial independence, contributing to the erosion of trust in media with detrimental effects on democratic processes and civic life. This trend of eroded trust in Romanian journalism

is confirmed by recent EU-level research, which indicates that only 32% of Romanians trust journalistic practices in 2023 compared to 39% in 2017 (Newman et al., 2023).

This study builds upon the original framework proposed by Hallin and Mancini (2004) for analyzing media systems, adapting it to elucidate the complex interplay of media market dynamics, economic viability, media consumption patterns, trust in media, editorial independence, and media regulations in Romania. It contends that the Romanian media landscape grapples with challenges stemming from limited professionalization, a dearth of ethical norms and codes of conduct, inadequate media regulations, and significant political intervention. Aligned with similar approaches (e.g., Boshnakova & Dănková, 2023; Brüggemann et al., 2014; Castro et al., 2017; Dobek-Ostrowska, 2019; Humprecht et al., 2022) inspired by the original framework of Hallin and Mancini (2004), this study employs the theoretical framework alongside other critical dimensions to assess the current state of the Romanian media landscape. The research questions guiding this study are as follows:

RQ1: How does the Romanian media system compare with other Eastern European media systems?

RQ2: What defines the contemporary Romanian media market, and what factors shape its development?

RQ3: What are the trends in media consumption in Romania, and how does trust in media influence overall media engagement?

RQ4: How do factors such as the professionalization of the media sector, media regulations, editorial independence, and political influence interact within the Romanian media landscape?

To address these research questions, this article employs a mixed methodology, encompassing (a) the analysis and interpretation of secondary data, (b) empirical data gathered in 2022 through a national survey, and (c) in-depth interviews conducted in 2022 with journalists, media professionals, and politicians responsible for media regulations. Some of this empirical data has been previously published in a book focusing on news consumption patterns in Romania, co-authored with my colleagues Buturoiu and Corbu (Buturoiu et al., 2023). The secondary data draw from recent country reports released by prominent NGOs (such as ActiveWatch, Reporters Without Borders, and Transparency International), academic institutions and researchers (including Toma et al., 2023), media organizations (like the Media Fact Book), and EU regulatory bodies or institutions (such as Eurostat and Eurobarometer 99).

The subsequent sections of this article delve into the unique characteristics of the Romanian media system, providing a detailed examination of journalistic practices in Romania. The concluding portion of the article investigates the evolution of media consumption in Romania, the effects of high television concentration and the emergence of digital media, the influence of inadequate media regulations and ethical codes on journalistic practices, and the challenges faced by media professionals in maintaining editorial independence within a system heavily reliant on advertising revenue, both commercial and political.

2. The Specificities of East and Central European Media Systems

In *Comparing Media Systems: Three Models of Media and Politics* (Hallin & Mancini, 2004), the authors examine 18 countries from Western Europe and North America, all considered "advanced democracies," due to their relatively homogeneous histories and political systems. Despite this, they argue against the existence of a singular "Western model" of media systems, recognizing the diversity shaped by unique historical and social contexts within the Western world. Since its initial publication, numerous media researchers have sought to apply the conceptual framework proposed by these American scholars to their own countries, attempting to universalize the model for all national contexts.

While applying the initial schema of media systems—Mediterranean or polarized pluralist, North/Central European or democratic corporatist, and North Atlantic or liberal model—has been useful for comparing media systems worldwide, it has sometimes fallen short in explaining certain cases. This article, echoing the sentiments of other researchers (e.g., Castro et al., 2017; Humprecht et al., 2022; Lilleker et al., 2021), suggests a more fruitful approach to comparative research. Rather than rigidly applying the four dimensions (structure of media markets, political parallelism, journalistic professionalism, and the role of the state) and assessing their fit, this article advocates for updating them to reflect the evolving realities of the online and social media landscape.

While this study initially draws on the *Comparing Media Systems* framework to examine the Romanian context, it also acknowledges the limitations of applying this framework to Romania. The framework, originally proposed by American authors, was designed as ideal types specific to Western nations, making its generalization to other national contexts problematic. Furthermore, the primary focus of Hallin and Mancini's study was on theory-building rather than hypothesis testing, emphasizing the need to contextualize the dimensions of the model within each country.

In analyzing Eastern European media systems using the four-media model developed by Hallin and Mancini, some scholars, such as Dobek-Ostrowska (2012), have revised the framework to account for the Mediterraneanization or Italianization of post-communist media systems. Since the publication of Hallin and Mancini's seminal work, numerous efforts have been made to empirically test their standardized dimensions, both in Western countries (e.g., Brüggemann et al., 2014) and specific media systems in East and Central Europe (e.g., Boshnakova & Dǎnkovã, 2023; Castro et al., 2017; Dobek-Ostrowska, 2012).

Numerous studies examining media systems in both Western and Eastern Europe have validated and nuanced Hallin and Mancini's empirical dimensions. Some research has focused on key variables for comparison, such as political parallelism and public service broadcasting, revealing significant differences in press freedom and foreign ownership among media systems (Castro et al., 2017). Recent analyses, like that of Boshnakova and Dǎnkovã (2023), have provided empirical evidence of strong correlations between press freedom, foreign ownership, political parallelism, and the strength of public broadcasting. However, they also underscore notable variations among Central and Eastern European countries, indicating that these nations do not share the same media system type.

Exploring media in Eastern Europe underscores the diverse trajectories in media market development, even among countries with similar socio-political histories. This study aligns with arguments by Miconi and

Papathanassopoulos (2023), asserting that a comprehensive understanding of media market consolidation necessitates consideration of each European member state's political, cultural, and economic legacy. To advance this understanding, the present study reconsiders the framework of comparison proposed by Hallin and Mancini (2004) in the context of Romania. It leverages comparative and theoretical approaches tailored to Eastern Europe to explore relevant variables for Romania's case.

Moreover, this article advocates for the inclusion of a "post-communist" cluster within Hallin and Mancini's four-dimension model, as proposed by Dobek-Ostrowska and Głowacki (2016) and others. However, it argues that such an approach would offer only a limited understanding of certain national contexts and their intricate transitions.

Hallin and Mancini highlight the unique aspect of Eastern European media systems as their rapid transition between two contrasting regimes. They argue that while all media systems undergo change, the pace varies significantly. Consequently, Eastern media systems bear the imprint of sudden commercialization and high state control, both prominent legacies of the communist era (Hallin & Mancini, 2013). Other scholars, such as Humprecht et al. (2022), building upon Hallin and Mancini's framework, introduce additional variables like foreign ownership, media ownership concentration, press freedom levels, and online news outlet usage. Using this expanded model, they propose a matrix of empirical indicators, diverging notably from Hallin and Mancini's original prototype. Interestingly, countries from democratic-corporatist and polarized-pluralist areas often end up in the same cluster, challenging strict adherence to the three spaces defined by Hallin and Mancini and blurring East/West territorial distinctions.

Another theoretical model, presented by Dobek-Ostrowska (2019), identifies the delayed transition to democracy in Eastern European countries as a significant influencing factor. This model outlines a unique trajectory for Eastern European media systems, somewhat independent from Hallin and Mancini's framework. Dobek-Ostrowska (2016) proposes four successive stages of institutional and societal reformation: pre-transition, primary transition, secondary transition, and late or mature transition. Each country's specific position results from the intersection of these stages and other variables related to the overall state of the media system. Consequently, Dobek-Ostrowska (2019) identifies four distinct Eastern media systems: hybrid liberal, politicized, transition, and authoritarian.

In a recent examination of media systems in the digital era, Humprecht et al. (2022) expand upon the model initially developed by Hallin and Mancini (2004), incorporating more timely indicators such as online audience responsiveness. Their cluster analysis yields three groups of media systems, with Eastern European countries divided between the polarized pluralist cluster and a hybrid cluster. According to this framework, the Romanian media system not only shares similarities with Bulgaria, Croatia, Slovenia, and Slovakia but also with Spain and Greece. These countries are characterized by lower inclusiveness, a less developed ICT sector and creative economy, and higher TV concentration (Humprecht et al., 2022).

In a departure from predominant socio-political and economic approaches, Gross (2023) presents a cultural assessment of media systems and their functions. Introducing a cultural model to evaluate the nature and operations of the Romanian media system and broader transformations in East and Central Europe, Gross offers a pertinent exploration of the challenges posed by a mixed cultural background, shaping both the media system and Romanian society at large. He advocates for a culture-driven understanding of Romania's

media system as essential for comprehending its ongoing transformation, providing valuable insights into the workings of Romanian society and its institutions.

While this article acknowledges the influence of a country's general culture on its media systems, it views the cultural perspective presented by Gross (2023) as complementary to approaches that focus on exploring the composition of the media industry, its economic viability, political independence, and new patterns of digital media consumption. Drawing from a vast literature on media systems categorizations, this study seeks to gain a deeper understanding of the multifaceted factors driving the evolution of the Romanian media landscape. In doing so, it delves into key features such as the evolution of the media market, patterns of media consumption, trust in media, economic sustainability, media regulations, editorial independence, and political interventionism, aiming to provide a nuanced analysis of the Romanian media ecosystem.

3. Particularities of the Romanian Media Market

The shift of the Romanian media landscape from communist propaganda to democracy commenced with the pivotal live broadcast of the 1989 Revolution and the subsequent downfall of Dictator Nicolae Ceaușescu. This transition saw the conversion of state television into public television and the emergence of an audiovisual market, including commercial channels, which necessitated a series of socio-economic and cultural changes that left a lasting impact on the media system as a whole.

The early years following the 1989 Revolution witnessed the proliferation of newspapers branding themselves as "free" and the dominance of the national broadcaster, which swiftly aligned itself with political power, leveraging its monopoly position (M. Coman, 2001). Boards of directors and presidents of the national broadcaster, often politically appointed, consistently subjugated the institution to political interests from the 1990s onward (I. Coman & Gross, 2012; Gross, 2019). This trend intensified after the government began directly funding national broadcasting services following the elimination of the radio–TV tax in 2016.

In 1993, the first commercial channel, Antena 1, emerged on the scene, owned by the controversial former communist businessman, Dan Voiculescu. Pro TV, backed by an international trust, debuted in 1995, introducing an American model that quickly gained traction. The public was enthralled not only by the polished image and professional standards achieved through Central European Media Enterprise's (CME) investment in equipment and training but also by the abundant entertainment offerings that resonated with a populace navigating the challenges of transition. Prima TV, briefly under the ownership of the Scandinavian group SBS Broadcasting, embarked on a primarily entertainment-oriented venture in 1997, while Kanal D captured audiences in 2007 with Turkish telenovelas brought by the Dogan group.

Unlike in other Central and Eastern European countries such as Hungary, the Czech Republic, Poland, or Slovakia, where private television stations were often funded by Western shareholders, Romania experienced limited and temporary foreign investments in its media sector (Dobek-Ostrowska & Głowacki, 2016; Gross, 2019). In the 2000s, Western companies gradually withdrew from the Romanian media market, leaving television stations predominantly in the hands of domestic "moguls" (Armanca, 2019). While the phenomenon of "de-Westernization" also occurred in neighboring countries, it was not as extensive as in Romania, suggesting that Western models failed to take root primarily due to cultural and ethical disparities (I. Coman & Gross, 2012; Gross, 2008).

These Romanian moguls, often referred to as "press barons," seized the opportunity and utilized their financial resources to assert control over the audiovisual space, gradually molding it into a tool for political maneuvering (M. Coman, 2016). Following the enactment of Law 504/2002 on Audiovisual Regulation, a surge in TV licenses issuance ensued, resulting in a media landscape heavily reliant on advertising revenue (Lupu, 2021). The advent of new technologies ushered in a paradigm shift, challenging traditional business models. In recent years, media outlets have synchronized their operations through the proliferation of online platforms and the widespread use of social networks for content dissemination, aided by increased internet penetration (89.2% in 2023; Eurostat, 2023).

In recent years, media advertising budgets have seen an uptick, although their distribution has not been uniform. The scarcity of data regarding the media market, ownership, and advertising budgets presents significant hurdles to the comprehensive evaluation of the media landscape. To assess media revenue, we rely on advertising revenue statistics obtained from Media Fact Book reports, serving as a proxy measure due to the absence of comprehensive public data on overall media revenue. In 2023, both television and digital advertising spending experienced growth, while radio ad revenue remained stagnant, and print ad revenue declined. According to the Media Fact Book, the total media market reached 683 million euros in 2023, with digital (+9%) and out-of-home (+8%) advertising witnessing moderate growth, a slight increase in radio advertising (+3%), stable evolution in TV advertising (7%), and a notable decline in print advertising by 11% (see Figure 1; Initiative, 2023).
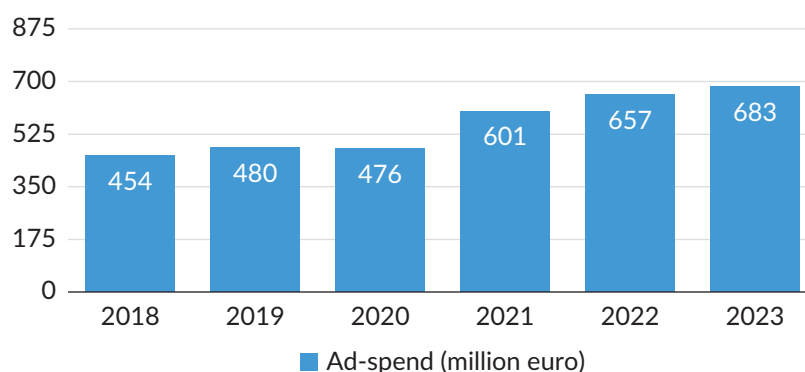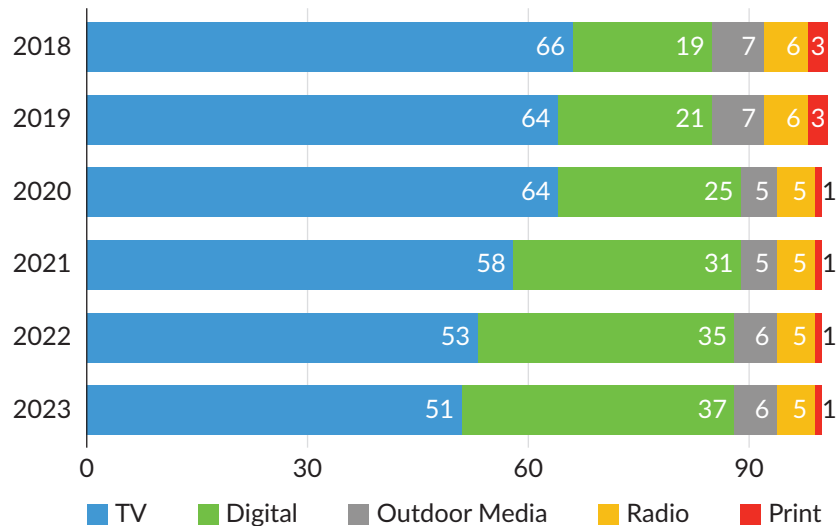

Figure 1. Advertising budgets allocated to media. Source: Adapted from Initiative (2023).

A recent notable trend is the significant growth of digital media, with a 25% increase compared to 2021 and a substantial 56% surge compared to 2020. This growth reflects the ongoing digitalization process initiated in 2020, driven primarily by organic factors such as eCommerce and shifts in media consumption patterns. By the end of 2022, digital media reached an estimated 232.9 million euros, constituting 35% of the total media market.

Meanwhile, there has been a noticeable decline in TV audiences, with this erosion accelerating in post-pandemic years, showing a decrease of 10% compared to 2021 and 8% compared to 2020. This decline can be attributed to the population returning to normal habits, including increased mobility freedom and more frequent out-of-home socializing and travel. On the other hand, both outdoor media and radio have experienced a resurgence in ad revenue, with outdoor media seeing a 23% increase and radio a 10% increase. Outdoor media generated 37 million euros, representing 6% of the estimated net media market,

while radio amassed 32 million euros, accounting for 5% of the market share. However, print media has continued its downward trajectory, experiencing a 10% decline compared to 2021, with revenue totaling 5.6 million euros, capturing slightly less than 1% of the media market share (see Figure 2; Initiative, 2023).


Figure 2. Advertising budgets allocated per media type (in percentages). Source: Adapted from Initiative (2023).

Media Fact Book reports indicate that television continues to dominate advertising spending, with a market valuation of 350 million euros in 2023, constituting 51% of the net media market. Data reveal that advertising TV budgets were predominantly distributed among major media trusts that own TV stations or media outlets with national coverage. Specifically, allocations were as follows: CME = 40%; Intact = 25%; Dogan = 10%; Thematics = 8%; RCS = 5%; others = 11%, leaving minimal allocations for small stations, radio, print, and online platforms (Initiative, 2023).

As suggested by certain analyses (Armanca, 2019; Lupu, 2021), the survival of small media outlets indicates that their owners might not consider them standalone businesses but prefer to invest minimally in them, using them as instruments of influence to serve their interests in other ventures and to strengthen their political relationships. The consequence is increased clientelism, as well as a serious ethical compromise for journalists who are forced to make concessions to maintain their jobs (ActiveWatch, 2023a). Moreover, it undermines the independence of the profession, contributing to the erosion of credibility and increasing its vulnerability.

4. News Consumption Patterns and Trust in Media

The overall market for news and public affairs-related content is relatively small in Romania, with Romanians consuming much less news (59%) compared to the European average of 72% (Eurostat, 2023). Concerning news consumption patterns, online media, including social media, has become the preferred source of news in Romania, reflecting a global trend. TV stations still remain highly popular for broadcasting news and current affairs programs, while print media has experienced a decline in both readership and circulation, reaching a historic low in 2023 (Figure 3).
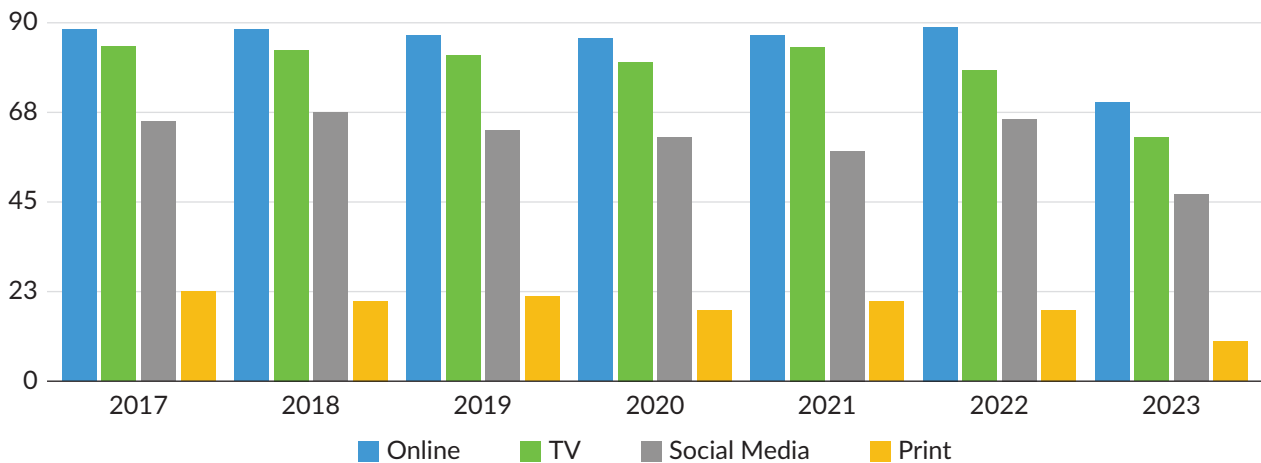
Figure 3. Sources of news in Romania. Source: Adapted from Newman et al. (2023).

Other reports confirm the high appetite for TV news in Romania; in the latest Eurobarometer 99 (European Commission, 2023), 80% of respondents mentioned TV as their top source for news, compared to a European mean of 75%. Online news is on the rise, but the exact audience is unclear; 53% of Romanian respondents indicated "online news websites" as one of their top sources for news, and 29% mentioned "social media" (European Commission, 2023). In terms of prominence, a recent national survey (Stanescu, 2023) indicates that the most frequently mentioned sources by other media outlets are the two main news channels: Digi 24 (597 mentions) and Antena 3 (548 mentions), and the generalist TV channel ProTV (199 mentions). This is a clear indicator that the inter-media agenda is currently set by news channels, which gained both visibility and trust in recent years. This pattern of inter-media agenda-setting is also validated by other studies (Buturoiu et al., 2022, 2023), showing that the flow is increasingly from news channels to generalist outlets. In line with similar findings (Perloff, 2022; Rossiter, 2021), Romanian data show that the proliferation of social media has further transformed inter-media agenda-setting dynamics, as social media content now engages in reciprocal agenda-setting with traditional news media (Buturoiu et al., 2022).

In today's fragmented media environment, media consumption patterns change rapidly, and partisan selective exposure is dramatically amplified by social media algorithms. Since media consumption, namely news consumption, consistently impacts how citizens interpret politics (Andersen et al., 2022; Blázquez et al., 2022; Hameleers, 2022; Hameleers & van der Meer, 2020), exploring the current repertoire of news consumption is key to understanding the new developments in media diets. In previous studies (Buturoiu et al., 2022, 2023), my colleagues and I have identified different patterns of news consumption in Romania through quantitative research. Based on similar studies (e.g., Andersen et al., 2022; Castro et al., 2022), four main profiles of news consumption have been defined: all-media consumers (high news consumption from both mainstream and social media), mainstream media consumers, social media users, and minimalists (low consumption from both mainstream and social media sources). The news consumption patterns of Romanians were mapped through a national survey carried out by Daedalus New Media Research in October 2022 (Figure 4).
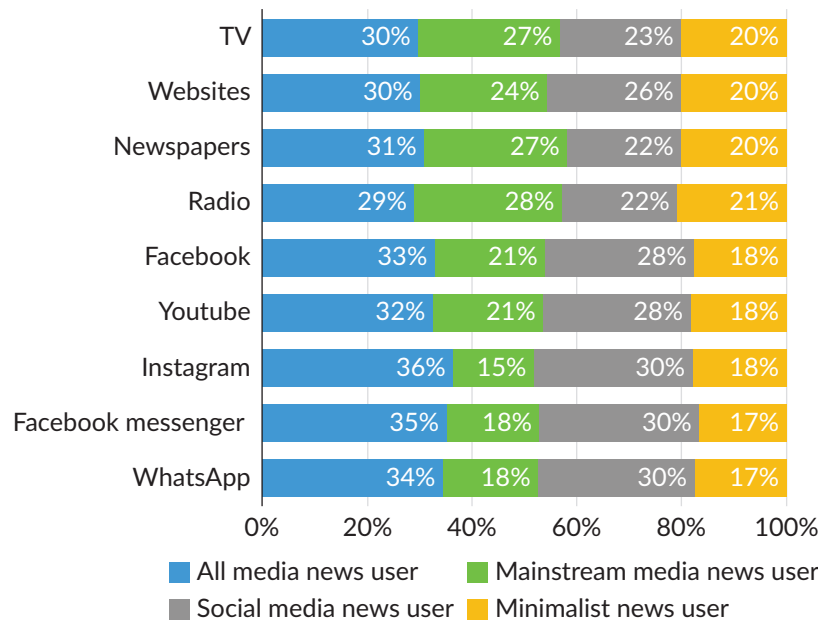
Figure 4. Profiles of news consumption in Romania. Source: Adapted from Buturoiu et al. (2023).

The data underscores that Romanians predominantly rely on mainstream media for news consumption, with television remaining the primary source, while Instagram and Facebook surpass other platforms. Minimalist news users are less common compared to other EU countries (Castro et al., 2022). Our research, consistent with previous studies (Park et al., 2020; Strömbäck et al., 2022), highlights significant shifts in media consumption patterns, indicating a gradual move from traditional sources to online platforms and social media. Meta, notably, holds a prominent position, with its platforms—Facebook, Facebook Messenger, Instagram, and WhatsApp—dominating the news consumption landscape.

Although Romanians haven't entirely abandoned traditional news sources, there are discernible disparities in media preferences and perceived credibility. According to the latest Eurobarometer, Romanian audiences exhibit less trust in national broadcasters compared to their European counterparts (43% vs. 49%), yet express more confidence in private TV stations (33% vs. 27%). Trust in print media is notably lower in Romania (22%) than the European average of 39%, suggesting reduced expectations for accuracy from print sources among Romanians. Conversely, social media and online news platforms are considered trustworthy sources by 18% of respondents, exceeding EU averages of 14% and 11%, respectively (European Commission, 2023). Similarly, the Reuters Institute Digital News Report 2023 underscores significant skepticism towards media organizations and journalists in Romania, with overall trust in media hitting a record low of 32%. The report links this decline in trust to factors such as "propaganda money, directed towards key newsrooms," and "smear campaigns against investigative journalists," which erode trust and professional integrity (Newman et al., p. 95).

5. Professionalization and Instrumentalization in the Romanian Media Landscape

Other crucial factors to consider when examining the characteristics of a media system include transparency, economic viability, editorial independence, and media regulations. Romania's lack of media transparency and inadequate regulatory framework have drawn attention in recent international reports, placing the country

among high-risk nations (Javier et al., 2022; Toma et al., 2023). Additionally, as highlighted in preceding sections, Romania has grappled with challenges to editorial independence due to political pressures, further contributing to its classification as a high-risk zone for undue political influence on editorial decisions (Reporters Without Borders, n.d.).

Journalistic transparency encompasses various facets, as elucidated in numerous studies (e.g., Latvala, 2023). While transparency in ownership and journalistic practices alone may not solve all the challenges facing media systems, it remains imperative, particularly in the Romanian media landscape, where issues of public accountability and ethics persist. Codes of ethics in journalism serve to shield readers, viewers, and listeners from manipulation by politicians, institutions, or private entities seeking to advance their agendas through media outlets (Lupu, 2021). Although Romania has some legal provisions safeguarding media freedom and editorial independence, their efficacy is hindered by challenges in implementation and enforcement (ActiveWatch, 2023a). These shortcomings contribute to a climate characterized by restricted media freedom, heightened political influence, and inadequate accountability within the media sector.

A recent study (Toma et al., 2023) introduces another vital aspect to the examination of the Romanian media landscape: economic viability, which extends to independence from both commercial and political pressures. According to the report, media viability in Romania poses a significant risk, with a score of 90%, indicating sluggish revenue growth across most media platforms. This situation renders media organizations more susceptible to influence from both commercial interests and political agendas. Similarly, the report highlights editorial independence from commercial and owner influence as an area of very high risk, scoring 97%. This suggests vulnerability to shifts in ownership or editorial policy due to the absence of legal protections against arbitrary appointments or dismissals (Toma et al., 2023).

Romania has a history of significant government control over the media (M. Coman, 2001; Gross, 2008, 2023). Various independent reports have investigated allegations of censorship in state-controlled media outlets, revealing how authorities wield influence through advertising revenue, media ownership, and regulatory bodies to shape media content and narratives in their favor (ActiveWatch, 2023a; Transparency International, n.d.; V-Dem, n.d.). Consequently, journalistic practices have been compromised, leading to a decline in public trust in the media. The country's low state capacity and government quality are evident in the mismanagement of the national broadcaster (Javier et al., 2022; Toma et al., 2023), the superficial parliamentary discussions regarding public media, and the overall dysfunction of the audiovisual regulatory agency (ActiveWatch, 2023a). These findings suggest that the root issue in the Romanian media system lies in the absence or inadequacy of essential institutions and mechanisms to nurture the development of free, independent journalism that prioritizes the public interest.

The risk associated with editorial independence from political influences is rooted in two fundamental factors: insufficient institutionalization and a lack of robust regulations to shield journalists from political or commercial pressures. The absence of clear regulations and consensus on journalistic norms, coupled with inadequate enforcement mechanisms, ultimately undermines the quality of information available to the public (Toma et al., 2023).

Political interference manifests through the allocation of subsidies for the press, often used for undisclosed political advertising. Another indication of the increasing politicization of the Romanian media landscape is

the presence of unethical electoral broadcasts on audiovisual platforms. In these instances, political parties pay for access but retain editorial control (ActiveWatch, 2023a; Lupu, 2021). The regulations governing the labeling of political advertising are particularly crucial in anticipation of the multiple electoral cycles scheduled for 2024.

In a recent report (Botan & Stancea, 2023) assessing the implementation of the Digital Service Act and the Code of Practice on Disinformation in Romania—both designed to foster a safer media environment that safeguards users' fundamental rights—authors highlight limited progress in accurately labeling political advertising across all media channels. There have been modest attempts to disrupt advertising-based incentives for political disinformation, particularly in digital media. Consequently, media users lack the tools to identify disinformation or political propaganda, undermining the transparency of democratic processes in Romania.

6. Conclusions

Building on extensive literature dedicated to journalistic practices, this article contends that media systems are not abstract ideals but concrete, distinct patterns that require the granularity of a national context for interpretation. The study explores how the original framework provided by Hallin and Mancini (2004) could aid in understanding the Romanian media system. Specifically, indicators such as the structure of the media market, political parallelism, journalistic professionalism, and the role of journalists in democratic processes, as conceptualized by Hallin and Mancini, are used to analyze Romanian journalistic practices. To provide more nuanced insights into the current media system, this study updates these dimensions to reflect new media consumption patterns and the realities of the digital media market. Additionally, other variables such as economic viability, editorial independence from owners and political influence, and media regulations are incorporated into the analytical model to better grasp the particularities of the Romanian case.

Using the conceptualization of Hallin and Mancini (2004), and in alignment with similar studies (Boshnakova & Dănkovã, 2023; Castro et al., 2017; Humprecht et al., 2022), the article concludes that there is no singular type of Eastern European media system. Despite common trends in Eastern European media markets, understanding journalistic models requires consideration of the political, cultural, and economic background of each country. As argued by other authors (I. Coman & Gross, 2012; Gross, 2023), decoding the cultural context is essential for exploring how instrumentalization, clientelism, and political parallelism have evolved. These characteristics may distinguish the Romanian media system from others in Eastern Europe (Gross, 2023). The article acknowledges that a culture-based approach to examining media can aid in understanding why a media system functions as it does. However, it further emphasizes the need to complement cultural insights with empirical data related to the media industry, surveys, reports, and interviews with experts and practitioners.

Utilizing the foundational conceptualization of Hallin and Mancini's media systems model, this article contends that the Romanian media system exhibits characteristics of both the liberal and polarized pluralist systems, resulting in a unique "hybridized" configuration. This hybridization is explored within the context of the media sector's evolution, characterized by significant TV concentration and the rapid expansion of digital and social media. Drawing on the author's previous research (Botan & Stancea, 2023; Buturoiu et al., 2023) and other scholarly findings (e.g., Boshnakova & Dănkovã, 2023; Dobek-Ostrowska, 2019; Miconi &

Papathanassopoulos, 2023; Toma et al., 2023), this study argues that Romania's media landscape is distinguished by diminished professionalism, limited economic sustainability (heavily reliant on advertising revenue), and constrained editorial autonomy, primarily influenced by commercialization and significant political intervention.

To provide a comprehensive analysis of the Romanian media systems, this article integrates indicators tailored to capture contemporary shifts in the media landscape into Hallin and Mancini's (2004) original model. Notably, it considers traditional and digital media consumption patterns, reflecting the dynamic nature of media preferences. The Romanian media market's advertising revenues exceeded 683 million euros in 2023, with online media constituting over a third of the market in both consumption and revenue (Initiative, 2023). While TV and digital platforms have witnessed growth, radio consumption and newspaper circulation have declined. This article critically examines these trends, highlighting the susceptibility of media organizations to commercial and political pressures posed by high-risk advertising revenue. Based on recent survey data (Eurostat, Eurobarometer, and Reuters Institute reports) and exploration of these contemporary indicators, the study concludes that media consumption patterns and trust in media in Romania are shaped by factors such as significant TV concentration, the rapid adoption of digital and social media, and low confidence in the written press.

Additionally, drawing from various international reports (Blázquez et al., 2022; Toma et al., 2023; Transparency International, 2023), this study contends that political interference significantly impacts media organizations in Romania by influencing editorial decisions and shaping news content. Qualitative insights gleaned from interviews with journalists, media professionals, and politicians knowledgeable in media regulation (Buturoiu et al., 2023) further underscore the inadequacy of ethical codes and industry regulations. Regulatory gaps, compounded by the use of propaganda funds and the misuse of public funds by politicians and public officials to manipulate newsrooms, are documented in recent analyses (ActiveWatch, 2023a; Lupu, 2021; Toma et al., 2023), indicating a lack of genuine commitment to press freedom among Romanian political elites.

Moreover, echoing Hallin and Mancini's recent emphasis (Hallin et al., 2023), this study underscores the importance of incorporating cultural elements into their original model. This aligns with a recent analysis by Gross (2023), which underscores the necessity of understanding the interplay between culture and journalism. To enrich theoretical frameworks, this study integrates empirical quantitative data pertaining to the Romanian media sector and qualitative data derived from previous interviews with journalists and media practitioners (Buturoiu et al., 2023). These empirical findings validate strong correlations between the restructuring of the media market, economic viability, professionalization, adherence to journalistic codes of conduct, and political interventionism (including masked political advertising and lax enforcement of media regulations). Additionally, the ascendance of digital media reshapes the media landscape, while social media algorithms influence public perceptions of matters concerning the public interest. Future examinations of the Romanian journalistic landscape should incorporate these indicators into analytical models and explore the evolving role of digital media in shaping power dynamics.

Acknowledgments

foundation for our book, *Patterns of News Consumption in a High-Choice Media Environment: A Romanian Perspective* (2023).

Funding

Conflict of Interests

The author declares no conflict of interests.

References

ActiveWatch. (2023a). *Political parties, money and the media: A toxic relationship.* https://activewatch.ro/publicatii/political-parties-money-and-the-media-a-toxic-relationship-freeex-digest-no-4-english

ActiveWatch. (2023b). *Condamnări penale pentru punerea în pericol a siguranței jurnaliștilor.* https://activewatch.ro/articole/condamnare-in-prima-instanta-pentru-planuirea-uciderii-unui-jurnalist

Andersen, K., Johansson, J., Johansson, B., & Shehata, A. (2022). Maintenance and reformation of news repertoires: A latent transition analysis. *Journalism & Mass Communication Quarterly, 99*(1), 237–261.

Armanca, B. (2019). *Televiziunea și țara. Istoria postdecembristă în oglinda catodică.* România literară. https://romanialiterara.com/2019/06/televiziunea-si-tara-istoria-postdecembrista-in-oglinda-catodica

Blázquez, J. F., Cappello, M., Milla, J. T., & Valais, S. (2022). *Governance and independence of public service media.* European Audiovisual Observatory. https://rm.coe.int/iris-plus-2022en1-governance-and-independence-of-public-service-media/1680a59a76

Boshnakova, D., & Dănkovă, D. (2023). The media in Eastern Europe. In S. Papathanassopoulos & A. Miconi (Eds.), *The media systems in Europe* (pp. 163–190). Springer. https://doi.org/10.1007/978-3-031-32216-7_7

Botan, M., & Stancea, A. (2023). *The implementation of the Code of Practice on Disinformation in Romania.* Bulgarian-Romanian Observatory of Digital Media. https://edmo.eu/wp-content/uploads/2023/09/Evaluating-the-Revised-EU-Code-of-Practice-on-Disinformation-in-Romania_v2.pdf

Brüggemann, M., Engesser, S., Büchel, F., Humprecht, E., & Castro, L. (2014). Hallin and Mancini revisited: Four empirical types of Western media systems. *Journal of Communication, 64*(6), 1037–1065. https://doi.org/10.1111/jcom.12127

Buturoiu, R., Corbu, N., & Botan, M. (2022). Profiles of news consumption in a high-choice media environment: Evidence from Romania. *Media Literacy and Academic Research, 5*(1), 95–115.

Buturoiu, R., Corbu, N., & Botan, M. (2023). *Patterns of news consumption in a high-choice media environment: A Romanian perspective.* Springer.

Castro, L., Humprecht, E., Engesser, S., Brüggemann, M., & Büchel, F. (2017). Rethinking Hallin and Mancini beyond the West: An analysis of media systems in Central and Eastern Europe. *International Journal of Communication, 11*, 4797–4823. https://doi.org/10.5167/uzh-144867

Castro, L., Strömbäck, J., Esser, F., Van Aelst, P., de Vreese, C., Aalberg, T., Cardenal, A. S., Corbu, N., Hopmann, D. N., Koc-Michalska, K., Matthes, J., Schemer, C., Sheafer, T., Splendore, S., Stanyer, J., Stępińska, A., Štětka, V., & Theocharis, Y. (2022). Navigating high-choice European political information environments: A comparative analysis of news user profiles and political knowledge. *The International Journal of Press/Politics, 27*(4), 827–859. https://doi.org/10.1177/19401612211012572

Coman, I., & Gross, P. (2012). Uncommonly common or truly exceptional? An alternative to the political system-based explanation of the Romanian mass media. *The International Journal of Press/Politics, 17*(4), 457–479.

Coman, M. (2001). The media landscape in Romania. *SEER: Journal for Labour and Social Affairs in Eastern Europe*, *4*(1), 173–186.

Coman, M. (2016). *Introducere în sistemul mass-media*. Elefant.

Dobek-Ostrowska, B. (2012). Italianization (or Mediterraneanization) of the Polish media system? Reality and perspective. In D. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 26–50). Cambridge University Press.

Dobek-Ostrowska, B. (2019). How the media systems work in Central and Eastern Europe. In E. Połońska & C. Beckett (Eds.), *Public service broadcasting and media systems in troubled European democracies* (pp. 259–278). Springer. https://link.springer.com/chapter/10.1007/978-3-030-02710-0_12

Dobek-Ostrowska, B., & Głowacki, M. (2016). 25 years after communism: Four models of media and politics in Central and Eastern Europe. In B. Dobek-Ostrowska (Ed.), *Democracy and media in Central and Eastern Europe 25 years on* (pp. 128–146). Peter Lang. https://doi.org/10.3726/978-3-653-04452-2/10

European Commission. (2023). *Standard Eurobarometer 99: Spring 2023*. https://europa.eu/eurobarometer/surveys/detail/3052

Eurostat. (2023). *Digital economy and society statistics—Households and individuals*. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Digital_economy_and_society_statistics_-_households_and_individuals

Gross, P. (2004). Between reality and dream: Eastern European media transition, transformation, consolidation, and integration. *East European Politics and Societies*, *18*(1), 110–131. https://doi.org/10.1177/0888325403259919

Gross, P. (2008). Forward to the past: The intractable problems of Romania's media system. *The International Journal of Press/Politics*, *13*(2), 141–152. https://doi.org/10.1177/1940161208314807

Gross, P. (2019). Journalism and transitions to democracy in Eastern Europe. In K. Wahl-Jorgensen & T. Hanitzsch (Eds.), *The handbook of journalism studies* (pp. 522–537). Routledge.

Gross, P. (2023). *The cultural core of media systems: The Romanian case*. Rowman & Littlefield.

Hallin, D., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D., & Mancini, P. (2013). "Comparing media systems" between Eastern and Western Europe. In P. Gross & K. Jakubowicz (Eds.), *Media transformations in the post-communist world: Eastern Europe's tortured path to change* (pp. 15–32). Lexington Books.

Hallin, D., Mellado, C., & Mancini, P. (2023). The concept of hybridity in journalism studies. *The International Journal of Press/Politics*, *28*(1), 219–237.

Hameleers, M. (2022). Separating truth from lies: Comparing the effects of news media literacy interventions and fact-checkers in response to political misinformation in the US and Netherlands. *Information, Communication & Society*, *25*(1), 110–126.

Hameleers, M., & van der Meer, T. G. (2020). Misinformation and polarization in a high-choice media environment: How effective are political fact-checkers? *Communication Research*, *47*(2), 227–250. https://doi.org/10.1177/0093650218819671

Humprecht, E., Castro Herrero, L., Blassnig, S., Brüggemann, M., & Engesser, S. (2022). Media systems in the digital age: An empirical comparison of 30 countries. *Journal of Communication*, *72*(2), 145–164. https://doi.org/10.1093/joc/jqab054

Initiative. (2023). *Media Fact Book: Romania 2023*. https://www.mediafactbook.ro

Latvala, J. (2023). *The mirage in the trust desert: Challenging journalism's transparency infatuation*. Reuters Institute. https://reutersinstitute.politics.ox.ac.uk/mirage-trust-desert-challenging-journalistic-transparency

Lilleker, D. G., Coman, I., Gregor, M., & Novelli, E. (2021). *Political communication and Covid-19*. Routledge. https://doi.org/10.4324/9781003120254

Lupu, C. (2021). *Jurnalismul în 2021: O cursă cu obstacole și cu tot mai puțini câștigători*. Friedrich Naumann Foundation For Freedom; Centrul pentru Jurnalism Independent. https://cji.ro/wp-content/uploads/2021/06/Jurnalismul-in-2021.-O-cursa-cu-obstacole-si-cu-tot-mai-putini-castigatori-raport.pdf

Miconi, A., & Papathanassopoulos, S. (2023). On Western and Eastern media systems: Continuities and discontinuities. In S. Papathanassopoulos & A. Miconi (Eds.), *The media systems in Europe* (pp. 15–34). Springer. https://doi.org/10.1007/978-3-031-32216-7_2

Newman, N., Fletcher, R., Eddy, K., Robertson, C. T., & Nielsen, R. K. (2023). *Reuters Institute digital news report 2023*. Oxford University. https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf

Park, S., Fisher, C., Flew, T., & Dulleck, U. (2020). Global mistrust in news: The impact of social media on trust. *International Journal on Media Management*, *22*(2), 83–96.

Perloff, R. M. (2022). The fifty-year legacy of agenda-setting: Storied past, complex conundrums, future possibilities. *Mass Communication and Society*, *25*(4), 469–499.

Peruško, Z., Vozab, D., & Čuvalo, A. (2021). *Comparing post-socialist media systems: The case of Southeast Europe*. Routledge.

Polyák, G. (2019). *Media in Hungary: Three pillars of an illiberal democracy*. In E. Połońska & C. Beckett (Eds.), *Public service broadcasting and media systems in troubled European democracies* (pp. 279–303). Springer. https://doi.org/10.1007/978-3-030-02710-0_13

Reporters Without Borders. (n.d.). *Index*. https://rsf.org/en/index

Reporters Without Borders. (2022). *Europe–Central Asia polarisation to the West, war & propaganda to the East: The European Union caught between two extremes*. https://rsf.org/en/classement/2022/europe-central-asia

Rossiter, E. (2021). Measuring agenda setting in interactive political communication. *American Journal of Political Science*, *66*(2), 337–351.

Stanescu, G. (2023). *Cele mai citate surse media din România*. Media Trust. https://www.mediatrust.ro/cele-mai-citate-surse-media-din-romania

Strömbäck, J., Boomgaarden, H., Broda, E., Damstra, A., Lindgren, E., Tsfati, Y., & Vliegenthart, R. (2022). From low-choice to high-choice media environments: Implications for knowledge resistance. In H. Oscarsson, J. Strömbäck, K. Glüer, T. Lindholm, & Å. Wikforss (Eds.), *Knowledge resistance in high-choice information environments* (pp. 49–68). Routledge.

Toma, R., Popescu, M., & Bodea, R. (2023). *Monitoring media pluralism in the digital era: Application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey. Country report: Romania*. European University Institute.

Transparency International. (n.d.). *Corruption perceptions index*. https://www.transparency.org/en/cpi/2023

V-Dem. (n.d.). *Country graph*. https://v-dem.net/data_analysis/CountryGraph

About the Author

Madalina Botan serves as an associate professor at the National University of Political Studies and Public Administration (SNSPA). Her teaching portfolio encompasses courses on mass media, misinformation, and the influence of new technologies on opinions and electoral behavior. She actively participates in two COST research networks dedicated to exploring opinions and radical polarization. Furthermore, she contributes to BROD, a European Digital Media Observatory hub, where her research concentrates on the impact of misinformation and the implementation of the European Code of Practice on Disinformation in Romania.

ARTICLE

Armenian Media System Overview According to the Hallin and Mancini Model

Patricia Izquierdo-Iranzo [1] and Lianna Sayadyan [2]

[1] Faculty of Communication Sciences, Rey Juan Carlos University, Spain
[2] Faculty of Journalism, Yerevan State University, Armenia

Correspondence: Patricia Izquierdo-Iranzo (patricia.iranzo@urjc.es)

Abstract

An overview of the Armenian media system is presented from the perspective of media professionals. Interference with the media system by the political system is analysed and the health of the Armenian media system is explored in the context of its transition from a Soviet republic towards a liberal model. The international situation contextualises analysis (resurgence of Russia–West enmity and globalisation) as does Armenia's troubled relationship with its neighbours: with Turkey due to the 1915 genocide and with Azerbaijan because of the dispute over Nagorno-Karabakh. Relevant domestic affairs, such as the successful citizens' mobilisation and the 2018 Velvet Revolution are also considered. The methodology used is based on in-depth interviews carried out in Yerevan (09/23) with 13 key informants; their answers are explored with content analysis using Hallin and Mancini's dimensions. The study will serve to discuss how the media are used as tools of power and how the media system reproduces the political system (polarisation and individual ownership). We find that media is owned and/or controlled by political parties, and that the government controls public media but also part of the private sector through broadcasting licences and economic pressure. News media are not self-sustainable, thus, media economic dependence compromises its editorial independence, and very few media are independent. There is plurality, but highly polarised; there is no systematic censorship, but defamation fines reinforce journalists' self-censorship; internet freedom is high but generates misinformation. Even so, there is professionalism, therefore there may yet be hope for the media if peace and the economy stabilise.

Keywords

Armenia; Armenian media; Hallin and Mancini; media systems; political system; press freedom

1. Introduction

This article provides an overview of the current Armenian media system. The analysis is guided by the Hallin and Mancini (2004) framework and special attention is paid to connections between the media and politics, media funding, and press freedom. To make it more understandable for non-Armenian readers, a brief socio-historical contextualisation now follows. Armenia is a former Soviet republic with a troubled recent history, which has passed from the rule of one empire to another, and suffers from unresolved territorial conflicts with its neighbours (Mirzoyan, 2010). Armenia's geopolitical position is complex, the country lives locked in the grip of its two historical enemies: Turkey, which perpetrated a massive genocide against the Armenian population in 1915; and Azerbaijan, with whom the Artsakh territory (known internationally by its Russian-Persian name: Nagorno-Karabakh) has been disputed for decades.

Artsakh is an enclave physically within the frontiers of Azerbaijan (linked to Armenia by a land corridor) but with a population of approximately 150,000 mostly Armenian inhabitants. The problem started in 1917, it "froze" during Soviet times, and restarted during the final years of the USSR (Kocharyan, 2016). The war has seen intermittent flare-ups with Azerbaijan over the last three decades, but two recent episodes became definitive turning points in the conflict. Firstly, the 2020 so-called 44-day war, when Armenia accepted Azeri sovereignty over the disputed territory. Secondly, the recent 19/09/2023 Azerbaijani bombing of Artsakh, which occurred while this research was being conducted in the field, that has caused the mass exodus of the Armenian population (Mourenza, 2023). As a Christian island on the border of Europe and the Muslim world (Sahakyan & Atanesyan, 2006), Armenia is aware of its solitude and has not ceased to seek a place on the international chessboard that would allow it to be safe, prosper, and decide its own future. It is what some experts call complementarian foreign policy that in the Armenian case means to balance strategic and friendly relations with Russia while engaging in political, economic, and cultural interaction with the EU and the US (Atanesyan et al., 2023), although this complementarian position is changing due to current circumstances, as we discuss in Section 6.

Two more elements are important for an understanding of Armenia: the diaspora and the Velvet Revolution. Armenia is a land of few inhabitants (3 MM) but with a large population spread around the world; the Armenian diaspora, estimated at some 8–10 million (International Organization for Migration [IOM], 2021), is the result of the genocide committed on the Armenian population by the Ottoman Empire in 1915–1918 (Adalian, 1991; Bruneteau, 2006). The largest diasporan communities are located in Russia, the US, and France, but also in Iran, Syria, Israel, Argentina, etc. Being aware of the threat that Armenia's solitude in international geopolitics poses to the preservation of the Armenian identity (Manukyan, 2021), the diasporan communities are determined to maintain their traditions, language, rich culture, and heritage to strengthen and protect their roots.

Another key element in understanding today's Armenia is the Velvet Revolution that took place in 2018 and forms part of the so-called colour revolutions, a remarkable phenomenon in which non-violent protests overthrew autocratic regimes in post-soviet republics: the 2003 Georgian Rose Revolution, the 2004 Ukrainian Orange Revolution, and the 2005 Kyrgyzstani Tulip Revolution (Beacháin & Polese, 2010; Rodríguez Rodríguez & Díaz Anabitarte, 2014). In the Armenian case, the peaceful social revolution managed to prevent Serzh Sargsyan's third term in office and brought the mass leader Nikol Pashinyan as Prime Minister. Twenty-first-century citizens' mobilisations (e.g., Arab springs) are also characterised by the key

role played by social media and the internet (Sánchez-Duarte & Magallón-Rosa, 2016). During the Velvet Revolution, citizen journalism was a very common practice and the Pashinyan leader's intense use of Facebook live-streaming to broadcast his marches to the capital and generate support was also noteworthy, all of this converted social media into an unprecedented mobilisation tool in Armenia (Khurshudyan, 2019; Odabashian et al., 2018).

2. Methodology

The main research technique used to collect data was face-to-face interviews. They were done in English and the answers have not been corrected to preserve the literalness of the interviewee's words. Fieldwork was carried out in Yerevan (Armenia) in September 2023, with nearly 20 testimonies accessed, among them 13 remarkable in-depth interviews with an average of 60 minutes duration, with key informants directly related to the topic under consideration—representatives of media outlets, academia, and experts in the field—all of them with senior professional profiles. Among them, we find: deputy editors or editors-in-chief from news agencies, investigative media, news websites, a leading daily newspaper, and an online news TV channel; directors of most relevant press corporations; cybersecurity and media experts; and also academics. Representatives of public broadcasting (TV and radio) are missing from this sample, as attempts to access them were unsuccessful. In addition, half a dozen semi-structured interviews and informal talks were conducted with diverse individuals, such as international relations experts, journalism students, and professionals in the fields of tourism and translation. These testimonies were useful for an adequate contextualisation and understanding of the information. Furthermore, two interviews, one in-depth and the other semi-structured, were carried out in Madrid in June and July 2023 with members of the Armenian General Benevolent Union in Spain, as a preparatory task for the fieldwork in Armenia. The location of the sample has been possible using the snowball technique, starting with members of the Armenian community in Spain. Talking to so many different profiles has been necessary for a foreign researcher for a better understanding of the context, considering also that the outside point-of-view of a researcher from abroad sometimes came as an advantage, particularly when approaching sensitive political issues. In addition, a local co-author has been essential for the correct interpretation of the facts in a local key.

The discourses obtained from the key informants provide the basis of the results obtained and have been analysed with content analysis based on Hallin and Mancini's (2004) framework dimensions for the media system as well as for the political system. Due to the lack of knowledge of the Armenian reality among Western readers, in the definition of analysis variables, priority has been given to addressing the specific national features of the Armenian case, rather than to the scope of the international comparison, that is why special attention has been given to key elements such as the role of the diaspora and the omnipresent impact of the war. Digital dimensions are recurrently addressed in the analysis to overcome a shortcoming of a model conceived in the pre-digital era.

As the adequacy of the Hallin and Mancini model for understanding variations between different systems around the world has been questioned (Mattoni & Ceccobelli, 2018), in this case study we select a hinge country between East and West, such as Armenia, which may help to assess to what extent the Hallin and Mancini model offers useful analytical tools for the study of non-Western countries´ media structure. Moreover, Armenia has a convulsive socio-political context and some peculiarities that make it an interesting case study. Furthermore, this research aims to give visibility to countries whose small size takes attention

away from their country-specific problems, as Kõuts-Klemm et al. (2024) denounce, where media and journalism research is mainly focused on big Western European countries.

3. Characterisation of the Current Armenian Political System According to Hallin and Mancini's Framework

Armenia is moving towards a liberal democracy, but after seven decades of communist rule, it still remains attached to a social welfare system, where private media and state-funded public media coexist. On the dimension called consensus versus majoritarian democracy, Armenia can be considered as a majoritarian democracy because the winning party (Civil Contract, in power since 2018, re-elected in 2021) currently concentrates political power so that there is a clear distinction between the government and the opposition, though not such a clear separation of power between legislative and executive. The ruling party also holds the majority in parliament, so every draft law brought by the government is passed. An example of this which affects the media structure is the new Law of The Republic of Armenia on Audiovisual Media that since 06/08/2020 allows public TV (loyal to the government) to broadcast advertising (The Republic of Armenia, 2020). Advertising was previously only broadcast on private channels, as public TV benefits from public budgets. This new law (and the change to the previous Law of the Republic of Armenia on TV and Radio Broadcasting; The Republic of Armenia, 2000), means that, since 2020, private channels share advertising incomes with public TV. Weakening private TV channels´ finances is a way to control them.

Regarding the distinction between rational-legal authority and clientelism as forms of governance, we find that Armenia clearly falls into the category of clientelism. The first contributory factor in explaining clientelism is that Armenia has been largely dominated and involved in conflicts (Nalbandian, 2018), and democratic culture needs peace, independence, and time to settle in. A second factor may be Armenian economic weakness; the country ranks only 85th out of 193 on the Human Development Index (United Nations Development Programme, 2022), and since independence in 1991, it has never risen above 75th place (90th being the lowest). According to a nationwide survey (Center for Insights in Survey Research [CFIISR], 2021) monthly household incomes are 43% less than 130,000DRAM (about €300), 30% between 130,000–260,00DRAM (€300–€600) and just 22% over 260,000DRAM (€600); and only 51% of the population sees a future for their family in Armenia over the next one to four years (CFIISR, 2021). Such data makes clear the daily economic struggle for people, organisations, and companies, which favours opacity and resource management often going hand in hand. However, clientelism in Armenia mainly emanates from the oligarchic system, where all too often access to resources is politicised and/or in exchange for various forms of support. A clear example of that is the broadcasting licensing system managed by the Commission on TV and Radio: In exchange for a broadcasting licence, some private TV channels moderate their level of opposition to the government. Another clear example is given by the informants in the sample when they affirm that some advertisers prefer to contract their advertising with government-friendly media in order to avoid inspections of their companies. In countries with a history of clientelism, governments can exercise pressure by enforcing the law selectively (Papathanassopoulos, 2004).

On the distinction between moderate and polarised pluralism, Armenia can be categorised in the polarised pluralism model, not due to the presence of parties with extreme ideology, but because the tense relationship between political blocs. According to Informants 1 and 13, political parties in Armenia do not differentiate among themselves on the basis of ideology—as there is no left-wing/right-wing party

distinction, the following statement makes this idea clear: "When during electoral campaign we analyse the electoral platforms, programs of parties, we don't see any real difference" (Informant 2). Armenian political parties cannot be categorised as in the West (conservatives, liberals, socialists, etc.). They are characterised using categories such as counter/pro-nationalism or counter/pro-Russian, but above all Armenian political parties are based on the leadership of an individual—they are personalistic parties.

Therefore, if Armenia is categorised as polarised pluralism, it is because the relationship between parties is not based on consensus at all and the relationship between government and opposition is not collaborative. Moreover, most of the sample points out that polarisation has increased greatly, not only in parliament, but among the population due to the defeat in the 2020 war which meant the loss of Artsakh territory: "Until 2020 there was the feeling that we all were connected about Nagorno-Karabakh independence....After 2020 this union crashed and I have the feeling that Armenia people is [sic] not any longer connected" (Informant 7). The war also fractures positioning towards Russia, with some actors seeing Russia as an important ally for Armenian national security ("the presence of Russian troops in Nagorno Karabakh is stopping Azerbaijan to make a full genocide in Nagorno," Informant 7) while others blame them ("Russian behaviour is not appropriate, they must keep open Lachin corridor and they don't," Informant 8). This points out that pro-Russian citizens started changing their minds and beginning to consider that Russia betrayed Armenia by failing to protect them: These statements are discussed in Section 6 and were collected in the days before the Azerbaijani bombing of Karabakh on 19/09/2023 (each new war episode increases polarisation).

On the idea that Armenia is forgotten by the international community, there is also consensus, but when it comes to the question of how to deal with it, disagreement arises again among informants.

Most of the sample points out that the political system is degraded, an opinion backed up by different public opinion surveys where the "army" is always the most highly-regarded institution and "political parties" the least, scoring under 5% in trust (CFIISR, 2021; Caucasus Research Resource Center [CRRC], 2022). The current degradation of the political system in Armenia, reduced to personal interests rather than group ideology, contrasts with the strong political party system that Armenia created on its independence and the strong community ties with which the ancient communities of the Armenian Apostolic Church structured society (Sahakyan & Atanesyan, 2006). In light of this context and according to independent international experts, Armenia is now considered a transitional or hybrid regime, only scoring 35/100 on democratic status (Freedom House, 2023).

4. The Armenian Media Structure

Mass media outlets in Armenia are all operated by both state-owned and for-profit corporations, but private media are far more numerous than public. Armenia has almost 10 news agencies, among which the most important are Mediamax, Arka, PanArmenian, and Armenpress (the only state-owned one). In the past, especially after the Soviet era when people were thirsty for a plurality of information, print media experienced a golden age and hundreds of print media were published. However, press circulation is currently very low and declining, the most popular daily newspapers include the leading liberal *Aravot* (Morning), *Joghovurd* (People), *Hraparak* (Square), and *Azg* (Nation). The director of one of these newspapers, as a member of the sample, says they print only 600 copies a day, which is incomparable with its 50,000 daily online visits. One of the reasons for keeping the print version is because of advertisers, such as

government institutions or large companies: "Maybe it is tradition, maybe it is prestigious for them to have an advertisement in print media" (Informant 8). Most informants agreed that in Armenia the online versions of newspapers differ from the print version of the same newspaper, and consumption modes are indicated as a cause: "If you read on the metro on the screen you cannot reflect about complicated issues, just read the titles, the highlights, don't dig, you scroll 20–30 titles in one minute" (Informant 8). One of the informants offers an interesting sociological explanation:

> The press in Armenia is young and, unlike in the West, there are no newspapers with roots and tradition, there are no newspapers that also act as generators of opinion in society. We do not have in Armenia an analogue like *Washington Post*. (Informant 7)

Armenia has around 50 private TV stations and two public networks called 1st Channel and The News Channel of Public TV. Another public channel called Shoghakat belongs to the Apostolic Church of Armenia; historically, communities established around the Armenian Apostolic Church have played a key role in social structure and political processes, and they are still a key player in Armenian society (Sahakyan & Atanesyan, 2006). The country also has dozens of private radio stations that provide different kinds of music, news, and analysis; leadership on the airwaves corresponds to Public Radio of Armenia (Hayastani Hanrayin Radio).

WhatsApp and Viber groups, alongside YouTube and Facebook, are the most widely used platforms/social media, with around 60% of the total population using them multiple times a day. Instagram, Telegram, and TikTok also have significant engagement, being used by 30–16% of the population (Prisma Research and Analysis, 2023, p. 28).

According to the Armenian population's media consumption shown in Figure 1, the pre-eminence of TV channels can be highlighted, preferably the Armenian ones (84%). Russian channels also have a prominent position (53%). Not all Russian media are necessarily pro-Russian; important information on the Russian media is offered by one member of the sample: "[Russian media] are the main source for Armenians about
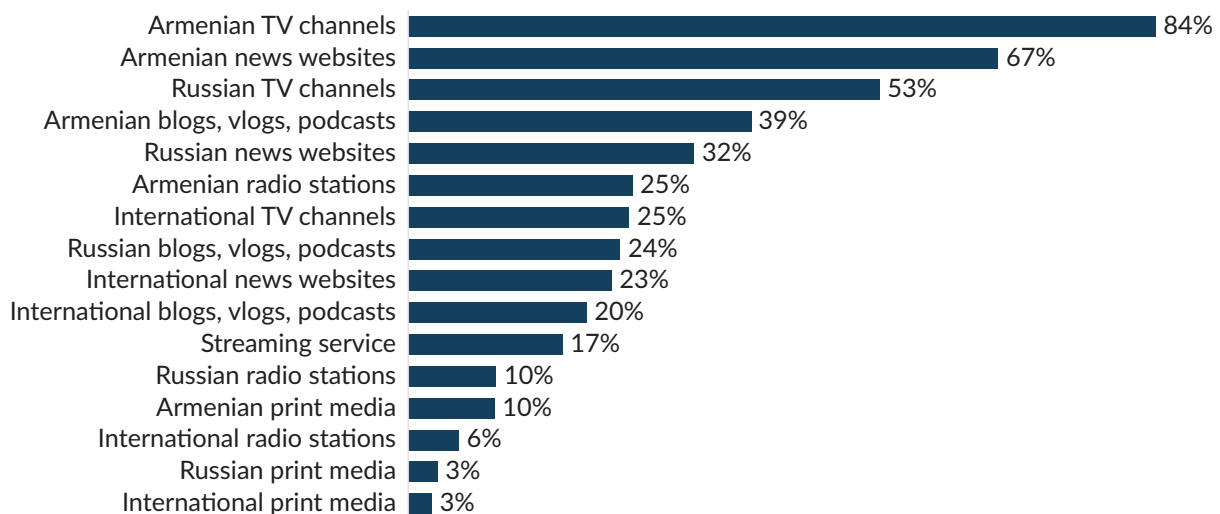
Figure 1. Media consumption by media type among the Armenian population. Source: Prisma Research and Analysis (2023).

international politics as Armenian media outlets don't have journalist correspondents in foreign countries" (Informant 6), which may explain pro-Russian feelings in public opinion (cf. Section 6).

If we look specifically at sources of information for political and social news, according to Prisma Research and Analysis (2023), digital platforms, particularly social networks, blogs, vlogs, and podcasts, appear to be the primary sources with 37% of the responses, very closely followed by TV (36%). Qualitative insights suggest that TV retains its significance as a primary information source, particularly in rural areas and among individuals aged 45 and above (Prisma Research and Analysis, 2023). At a greater distance, we find family and friends (12%), news websites (10%), radio (4%) and print media (1%). If we combine 37% of social networks and 10% of news websites, we see that 47% of the Armenian population gets its news through digital media. An important fact is the increasing shift from traditional sources to internet-based sources for consuming political and social news; the growing trend of accessing news websites via social media (Prisma Research and Analysis, 2023) is particularly noteworthy. This trend shift has also been recurrently pointed out by most of the sample, recognising the value of this trend as an alternative and agile source of information, but also warning of the high danger of misinformation that it might suppose.

Concerning trust in media, we observe that 34% of the population "don't trust any media" (CFIISR, 2021, p. 4). More recent data confirms this trend as 47% find "news presented by Armenian media" somewhat untrustworthy or totally untrustworthy (Prisma Research and Analysis, 2023, p. 30). All these percentages are lower than the level of media consumption, which may imply that people still want to know the truth but do not perceive media sources as appropriate for this. Also, the political elites' anti-media speech, found by the international non-governmental organisation focused on safeguarding the right to freedom of information, Reporters Without Borders ([RSF] 2023), contributes to undermining public trust in the media.

The final element for a full picture of the media structure is that there is a significant market for Armenian media in countries with large diaspora communities. In the USA alone there are over a dozen newspapers, published either in the local language and/or in Armenian. Informants (8 and 12) report that this media has become outdated, and they have no influence on Armenian society as they are very much focused on their local context; in fact, when Armenians in the diaspora want to be updated about current issues in the motherland, they consume Armenian made-in-Armenia media. A different case is that of some diaspora influencers who have followers in their home countries as well as in the Armenian motherland. To sum up, while the "traditional" diaspora media have no influence on public opinion in Armenia, it seems that new platforms (some influencers) are beginning to exert influence. Where the diaspora has exercised influence, both then and now, is in economic matters. Two examples of this are the financial support of some diasporan Armenians who contributed to independent TV broadcasting in the late 1990s (Informant 2), and the Russian diaspora's current economic aid in support of opposition media (Informant 12).

5. Analysis of the Armenian Media System Revisiting Hallin and Mancini's Framework

5.1. Political-Media Parallelism and Media Financing

The entire sample agrees that today's Armenian media are degraded and polarised, as they agreed before on the political system's degradation and polarisation (cf. Section 3). Several explanations are offered for the deterioration of the media, and they can all be grouped into two types: (a) those related to the new digital

environment, and (b) those connected to the political structure, specifically to clientelism, one of the dimensions already explained in Section 3. Among the first group of explanations, sample members point out the voracity and competitiveness that the internet has brought to the media landscape in Armenia: saturation of the market, immediacy that invites unreflective consumption and misinformation, distribution of advertising among more actors, too many new actors, and intrusiveness. Within the second group of explanations, clientelism, informants affirm: "Some media outlets were supported with black money, that is why maybe now we are suffering a big crisis in media" (Informant 3); "no strong politician system, this is the problem, then we cannot have normal media area" (Informant 7); or "wealthy businessman, political figures they think that they should own or control media…because this understanding, they give some easy money to editors and media market is not developing in absolute" (Informant 10).

The whole sample groups the media as follows: (a) pro-government media, (b) oppositional media, and (c) independent media. Pro-government media include some private media and all public media: "Public TV is fully government-oriented" (Informant 4's words, and similar statements from most of the sample). The second group, opposition media, mostly consists of media owned by previous leaders or circles close to them, and "new oligarchs are appearing, and they are controlling their share of media" (Informant 10). What is relevant here is that the media belongs to one person. Two informants (2 and 10) make a distinction in the opposition media. They distinguish between those founded or bought by oligarchs (and/or previous leaders) and the media "for rent": "Other media…as soon as they become influential, they seek somebody with money to shell their influence to" (Informant 10). To sum up, in the first group the media is used to maintain power and in the second to stay active in the political race. Proof of that is that it is common practice to sell the media after bad election results: "[after losing the 2021 elections] dismantled all his media—they were the third force in parliament and they sold TVs, websites, telegram channels….They decided that if their propaganda weapon was not effective they did not want them anymore" (Informant 10). The third group is very small, according to the whole sample just a few can be considered independent media outlets in Armenia. Some media claim to be independent, but voices from the sample point out that they might have "hidden agendas." Independent media are generally supported by international donors (by Western institutions); informants 4, 6, 8, and 9, as professionals in media receiving international funding, declare no direct dictation from the donors concerning editorial policy, which allows them free coverage of national politics: "Western donors are not interfering in editorial policy….It is a matter of values, not agenda" (Informant 9). As regards journalistic quality, a direct relationship can be observed between independent media and the higher quality of their content from a journalistic point of view.

An imbalance is perceived in the Armenian media market: too much media for too little an audience, with an even smaller audience willing to pay for access to news—"Our people not only here also in the diaspora, they prefer not to pay any cents for a content if they can find another content which is free" (Informant 7). Monetisation attempts such as subscription plans have failed ("some colleagues tried, they didn't have law, I think it is too early for us," Informant 8) or are grossly insufficient ("we were doing a special platform where you have to pay to watch the content, for the three months we had it open we collected 18 euros," Informant 7). Both informants also point out that the elites do pay for specialised information (financial, scientific, etc.).

Advertising does not seem to be the solution either. A few explanations are given: the advertising market does not handle large amounts of money because the Armenian market is small and it is now even smaller for private media because since 2020 they have had to share advertising incomes with public TV

(cf. The Armenian Law on Audiovisual Media analysis in Section 3). According to some members of the sample, there is also some corruption in the allocation of advertising: "[In the] previous regime in Armenia, all the ads market was concentrated in the hands of the son-in-law of the former president" (Informant 10). The idea that some advertisers prefer to invest their budget in government-friendly media to avoid possible inspections of their business is mentioned by several informants (1, 2, 4, and 10). Fortunately, large international advertisers operating in the country do not follow this way of thinking, which gives some space for independence. Informant 8 also speaks of how globalisation punishes small markets in terms of advertising, for instance, worldwide streaming platforms undervalue content made in minority languages.

As a result of the above, "It is impossible to be self-sustained, to live without a sponsor" (Informant 8); "unfortunately, I cannot name any media which is independent because it is commercially independent so if it exists, they are not covering current affairs, or political issues, they are just entertainment or sports" (Informant 12). Listening to all the testimonies one gets the impression that the media in Armenia devote as much effort to economic survival as they do to journalistic work itself.

In short, the media is not divided along ideological lines, but according to which group of power each outlet is financed by, thus the media is used to obtain/retain power. Political polarisation is reflected in media polarisation, both exacerbated by economic weaknesses and war pressures.

5.2. Press Freedom

No Armenian reporter/media worker has been killed and none has been detained to date according to the prestigious international organisation RSF, devoted to denouncing abuses of press freedom around the world. However, the same source affirms that anti-media rhetoric from political elites has been established and that this hate speech against journalists goes unpunished, which ends up affecting reporters' work (RSF, 2023).

Only one informant repeatedly speaks of propaganda: "media viewed always as a propaganda weapon" (Informant 10), a comment made in relation to the seven decades under the Soviet system. But it is also made in connection with the war, as we once again see how armed conflict constantly shapes Armenia:

> [The usage of propaganda] is especially critical during wartime, then many people think that media should be a propaganda weapon.

> We had a very unfortunate situation in 2020, when the government was basically under the state of military rule, was forcing the media to only speak about military success. But there was not military success…so people were very surprised and disappointed when they knew we were actually losing land and people. (Informant 10)

The whole sample agrees that there is no machinery for systematic censorship, e.g., all of them declared they were speaking freely during the interviews, on and off the record, which is confirmed by the researchers' perception. However, this freedom of expression has some limits and has fluctuated between governments. Most members of the sample recognise that they can now exercise openly critical opposition which was unthinkable before. To fully understand the comparison with "before," one should not only remember the communist past but also, after the Soviets, there were periods when serious incidents of abuse of power

occurred, such as during the Republic Square demonstrations: "Ten people were killed, in 2008 March 1st, emergency situation declared and many websites where blocked, YouTube was blocked for a couple of days, it was the first time in the independent Armenia when Internet was blocked" (Informant 3). Indeed, a 20-day censorship was introduced by presidential decree after that.

Given this context, the 2018 Velvet Revolution was very welcome as shown in the following data from a national survey. When asked "what kind of expectations did you have from the events (known as "Velvet Revolution") of April 2018?," 82% of the population answered "positive," 12% "no expectations," and just 3% had negative expectations (CRRC, 2020). This peaceful mass social mobilisation brought about a change of government that automatically improved democratic indicators, e.g., from 2018 to 2019 Armenia climbed 20 places in the international press freedom ranking (RSF, 2019). But after that hopeful start democratic deterioration started again, as most of the sample admits. An example of this is media interventionism, "the initial times of this government five years ago, they had very limited influence on media, because most of the media belonged to the previous authorities....They were so popular that using Facebook or other social media was completely compensating" (Informant 12). The turning point was the 2020 war when Armenia lost the sovereignty of Artsakh to Azerbaijan. Since then, several informants explain, the prime minister's popularity has fallen. Before the 2020 war, 67% of the population believed that "the Direction in which the country's domestic politics are going" was the right one (CRRC, 2020). After the defeat in the 2020 war, 45% feel that "Armenia is heading in the wrong direction" (CFIISR, 2021). Even so, Nikol Pashinyan was re-elected in 2021.

Interference in the media takes place via economic and/or legal means. One example is the previously mentioned laws which basically mean a serious decrease in advertising income for the private media (cf. Section 3); weakening private TV channels' finances is a way to control them. Private channels are also controlled through the broadcasting licensing system: "Previous government designed the system the way that only their media could get the license and these guys are not reforming it" (Informant 10; "these guys" refers to the present government).

Another example, explained by Informant 12, is the changes to article 1087.1 of the Civil Code concerning insult and defamation (which came into effect on 23 October 2021). Fines for insulting and defamation have tripled: "You do not go to jail, but you get fines, you get so many debts that you are not allowed to work anymore" (Informant 4). This economic threat undoubtedly reinforces self-censorship among journalists. A further example of government interference in the media has to do with the appointment to positions. The members of the board of the Council of Public Broadcasters of Armenia, which is the body responsible for the management and supervision of the public broadcaster, are appointed by the prime minister. It seems that this process is becoming more formal as, according to Informant 6, the Commission now organises an open call for candidates and a Provisionary Competition Commission elects the members. Even so, cases of hand-picking members to occupy high responsibilities in public media are reported: "Right now, in public TV, the editor of this news department of public TV is the former editor of the prime minister's family newspaper" (Informant 3, with similar observations by Informants 4 and 6).

Maybe because the internet allows more nooks and crannies of freedom, the overall perception of the sample improves when evaluating internet freedom of expression, a perception corroborated by Freedom House (2023), which awards 72 points (out of 100) to Armenia in "internet freedom." In comparative terms,

this score is somewhat better than Armenia's 49/180 place in the world press freedom ranking (RSF, 2023). Even so, several voices in the sample as well as independent research (Prisma Research and Analysis, 2023) warn of the "noise" created by internet-based media and the danger of misinformation.

Finally, it is important to highlight the existence of associations of media professionals in Armenia devoted to improving media independence, currently and actively working on issues such as media self-regulation or protection of press freedom. This commitment to the professionalisation of journalism gives hope for the future strengthening of the media system.

6. Main Findings: A Snapshot of the Armenian Media-Political System

Armenia is an ancient nation but, as an ex-Soviet republic, is de facto a young independent country. It has a history of domination, war, and enmity with its neighbours (Azerbaijan and Turkey) which hampers Armenia's place on the international stage and affects its economic and democratic development. Armenia is considered a transitional or hybrid regime only scoring 35/100 in democratic status (Freedom House, 2023) and ranking 85/193 in the Human Development Index. Since its independence in 1991, Armenia has had several governments varying in degrees of authoritarianism and Russian patronage. The civil society's accumulated discontent (economic struggles and abuses of power) erupted in the 2018 Velvet Revolution—the peaceful social mobilisation that brought a new government and new democratic winds of change. But the loss of sovereignty over Artsakh in the 2020 war plus a few more episodes of governmental interference (in the media, for instance) started to undermine government popular support (though the government was re-elected in 2021), which in turn seems to be leading to a decline in the quality of democracy.

This historical-political context is reflected in the media system. There is plurality in the Armenian media today and more freedom of speech—the voice of the opposition can be heard—but in such a polarised way that it does not contribute to democratic dialogue. Political and media polarisation feed back into each other.

Public media is loyal to the government (hand-picking people for positions of responsibility is common), and the government also controls part of the private media through the broadcasting licensing system and regulations exerting economic pressure. Opposition media belong to former leaders or other oligarchs. In short, both groups, the government and the opposition, use the media either to maintain power or to attain it; an example of this is that selling media outlets after bad electoral results is common practice ("if *my* media does not bring me political victories, I no longer need it" mentality).

There is plurality in the Armenian media system, but there is no independence because news media are not economically self-sustainable; advertising and monetisation initiatives are not enough and sponsors are needed, and this financial dependence conditions editorial freedom. International donors, diversification of donors, and advertising by international companies are identified as the sources of funding that give more independence to the media. Very few media are independent, they are also the ones that tend to offer high-quality journalistic content.

There is no machinery of systematic censorship, although mechanisms such as exorbitant fines for defamation fuel journalists' self-censorship. Freedom of speech exists and according to the international non-governmental organisation Freedom House, Armenia scores highly (72 out of 100) on internet freedom.

However, the shift from traditional sources to internet-based sources for the consumption of political news and, specifically, the increasing trend of accessing news websites via social media might increase misinformation. The dominance of TV and new media stands out, as opposed to the low penetration of radio and print media.

7. Discussion

The first question to be discussed when researching anything in Armenia is its foreign policy, because, as a small young republic, this strongly affects domestic matters, including the political and media systems. To find "its place in the world" is a must for Armenia, as its security, its economic sustainability, and the preservation of its cultural identity (Manukyan, 2021) depend on it. Troubled relationships with neighbours have forced the country to conduct complementarian foreign policy specifically between the UE/USA and Russia. However, the 2020 Artsakh-Karabakh War and the present escalation of enmity between Russia and the West are changing this balance. For some authors, Armenian elites have started to doubt Russia's role in Armenian international policy (Atanesyan et al., 2023). Our findings are partially coincidental with these results, as sample testimonies also point out that the elites' trust in Russia is declining as it is also declining among the citizens. But on this last point our results are not coincidental, because, according to a nationwide survey (Atanesyan et al., 2023), although Armenian society's trust in Russia has consistently declined over the past 10 years, Russia is still considered the main strategic ally by public opinion. An explanation for that may be the major role of Russian media in Armenian society's media consumption, shown in Figure 1 (Section 4). It is also important to highlight that this nationwide survey was carried out before the very recent 19/09/2023 war where Armenia lost and experienced considerable international isolation.

A second question to address in this discussion concerns the strengths and weaknesses of the Hallin and Mancini model. It is clear that the model's dimensions are not sufficient to approach the dynamics of digital age media (Mattoni & Ceccobelli, 2018), nor are they suitable for considering the key role that smart mobs (Rheingold, 2004) play in the 21st-century social changes, that is, the empowerment of connected citizens. Today, media systems research does need to include those two dimensions—information and communication technologies impact, plus the power of cyber-activism—because in present hybrid media systems (Chadwick, 2013), older media merge with and adapt to newer digital media and the news-making process is no longer dominated by elites (Mattoni & Ceccobelli, 2018). To overcome such shortcomings, Mattoni and Ceccobelli (2018) propose to add, for the study of media systems, information, and communication technologies-related indicators transversally in the four original dimensions (structure, political parallelism, professionalism, and the role of the state) plus a new one: grassroots participation. Most case studies already do both. For instance, Vasallo (2020) reports that "the digital landscape scenario reflects the overall national media situation in Malta" (Vasallo, 2020, p. 23), and finds the advantages of it for press freedom: "Access to new technologies has also meant that new, independent newsrooms have emerged…who together with other established media houses, are creating a platform for investigative journalism to flourish" (Vasallo, 2020, p. 23). Our case study also addresses both improvements to the model, a digital vision along the four classic dimensions, plus the new dimension on smart mobs/citizen journalism. Our findings partially agree with Vasallo's results, as on the one hand, the sample members admit higher levels of press freedom on the internet than in traditional media but, at the same time, they highlight negative aspects brought by the internet such as the danger of misinformation, voracity of the market, or intrusiveness. As regards to grassroots participation, our case study reports the key role played by social media during the Velvet Revolution (2018). This insight supports Mattoni and Ceccobelli's

(2018) position: citizen mobilisations are now so important as to rebalance interactions between media and political systems.

Still, Hallin and Mancini's four dimensions for comparing media systems are a milestone, and they have aged better than their three ideal types proposed—Mediterranean or polarised pluralist model, North/Central Europe or democratic corporatist model, and North Atlantic or liberal model—as they themselves admit in subsequent reviews of their own work (Hallin & Mancini, 2012, 2017). The four dimensions have guided our analysis, but the ideal types proposition has also been useful to our work as follows: in the political contexts of media systems, Armenia shares some characteristics with the polarised pluralist model or Mediterranean model (Hallin & Mancini, 2004), such as a majoritarian democracy that allows legal proceedings against media owners which feed journalists self-censorship and clientelism and that sometimes leads to government pressure by selective law enforcement (Papathanassopoulos, 2004). Regarding the role of the state, Armenia is moving towards a liberal democracy, but as a former Soviet republic, it is still a work in progress. We cannot yet completely evaluate the movement of Armenia´s media system from the "Mediterranean-post Soviet" model towards the Liberal model. It would seem that some endemic characteristics, the strong political-media parallelism (government interference and media ownership of the political class), together with the small size of the market (globalisation punishes small markets) are still heavy burdens. In comparable countries, e.g., Malta (a small country moving from the Mediterranean to the liberal model), scientific literature reports that this transition was adversely affected by increased advocacy by all media organisations and, as in Armenia, by the pronounced role of political parties and the limited capacity of a small market (Vella et al., 2023).

8. Conclusions

The health of the Armenian media system is not good. The media is polarised as political interference is very high (power concentration and clientelism) and anti-media rhetoric has been installed among political elites which feeds the low public trust in media (public trust in political parties is even lower). Political elites' media ownership is the rule, thus, media economic dependence burdens media opinion independence. International donors and international advertisers are identified as the best source of media funding for opinion independence, but caution is called for, as it fuels Armenia's dependence on foreign actors, and "hidden agendas" need to be watched.

Press freedom exists but defamation fines reinforce self-censorship. In short, Armenia is just one more case proving that media systems are a reflection of a country's political system. It is not clear yet if the ongoing transition towards a liberal model with a Soviet past helps or constrains the media system. As in other similar countries, the pronounced role of political parties and the limited capacity of a small market are adversely affecting the media system. The committed work of associations of media professionals and some media outlets gives hope for improvement. Moreover, peace needs to settle into place.

Armenia suffers/benefits from the same problems/advantages as any other country in the digital era; the threat of misinformation that comes with internet-based news media versus the internet as a new space of freedom. However, the harm may be worse in terms of democratic quality erosion because the status of democracy in the country is not completely stable yet. The Armenian population was fully integrated into the concept of smart mobs, which was demonstrated by the protagonism of the citizens and social media in the

successful and peaceful Velvet Revolution. Two growing trends have been pointed out: one of accessing news websites via social media, and another of diasporan influencers increasing their number of followers in the motherland. Both deserve further monitoring.

Even though the respondents were a qualitative sample, the heterogeneity of their profiles and the saturation obtained in their responses gives a representative overview of the Armenian media system from the perspective of journalists and editors.

Conflict of Interests

The authors declare no potential conflict of interests.

References

Adalian, R. P. (1991). The Armenian genocide: Context and legacy. *Social Education*, *55*(2), 99–104.

Atanesyan, A. V., Reynolds, B. M., & Mkrtichyan, A. E. (2023). Balancing between Russia and the West: The hard security choice of Armenia. *European Security*. Advance online publication. https://doi.org/10.1080/09662839.2023.2258528

Beacháin, D. Ó., & Polese, A. (Eds.). (2010). *The colour revolutions in the former Soviet republics: Successes and failures*. Routledge.

Bruneteau, B. (2006). *El siglo de los genocidios violencias, masacres y procesos genocidas desde Armenia a Ruanda*. Alianza.

Caucasus Research Resource Center. (2022). *Caucasus barometer 2021 Armenia*. https://t.ly/QegWS

Center for Insights in Survey Research. (2021). *Public opinion survey: Residents of Armenia*. https://shorturl.at/ivCW3

Chadwick, A. (2013). *The hybrid media system: Politics and power*. Oxford University Press.

Freedom House. (2023). *Democracy status*. https://freedomhouse.org/explore-the-map?type=nit&year=2023

Hallin, D. C., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (Eds.). (2012). *Comparing media systems beyond the Western world*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (2017). Ten years after comparing media systems: What have we learned? *Political Communication*, *34*(2), 155–171.

International Organization for Migration. (2021). *Skills mapping through big data: A case study of Armenian diaspora in the United States of America and France*. United Nations Network on Migration. https://rb.gy/xpvygg

Khurshudyan, E. (2019). *Social movements and social media: The case of the Armenian Velvet Revolution* [Unpublished master's thesis]. Stockholm University. https://rb.gy/derc7a

Kocharyan, S. (2016). *Why is the Nagorno-Karabakh conflict still not resolved?* MIA.

Kõuts-Klemm, R., Eberwein, T., Peruško, Z., Vozab, D., Rožukalne, A., Skulte, I., & Stakle, A. (2024). Media and journalism research in small European countries. *Media and Communication, 12*, Article 7205. https://doi.org/10.17645/mac.7205

Manukyan, S. (2021). An empirical study of the criteria for the ethnic identity of Armenians in Armenia. *Journal of Sociology: Bulletin of Yerevan University, 12*(34), 3–18.

Mattoni, A., & Ceccobelli, D. (2018). Comparing hybrid media systems in the digital age: A theoretical framework for analysis. *European Journal of Communication, 33*(5), 540–557. https://doi.org/10.1177/0267323118784831

Mirzoyan, A. (2010). *Armenia, the regional powers, and the West: Between history and geopolitics.* Palgrave Macmillan.

Mourenza, A. (2023, September 29). La apresurada huida de los armenios de Nagorno Karabaj: "Dejamos atrás toda una vida." *El País.* https://elpais.com/internacional/2023-09-29/la-apresurada-huida-de-los-armenios-de-nagorno-karabaj-dejamos-atras-toda-una-vida.html#

Nalbandian, L. (2018). *The Armenian revolutionary movement: The development of Armenian political parties through the nineteenth century.* University of California Press.

Odabashian, V., Manoukian, A., & Witman, P. (2018). Social media and the Velvet Revolution in Armenia. In *Proceedings of the EDSIG conference* (Vol.4, Paper n4776). EDSIG.

Papathanassopoulos, S. (2004). *Politics and media: The case of Southern Europe.* Kastaniotis.

Prisma Research and Analysis. (2023). *Freedom of expression and media consumption research in Armenia.* Prisma LLC. https://internews.org/resource/freedom-of-expression-and-media-consumption-research-in-armenia

Reporters Without Borders. (2019). *Clasificación mundial 2019: Tabla de países.* https://www.rsf-es.org/clasificacion-mundial-2019-tabla-de-paises

Reporters Without Borders. (2023). *Clasificación mundial de la libertad de prensa RSF 2023: Tabla de países.* https://www.rsf-es.org/clasificacion-mundial-de-la-libertad-de-prensa-rsf-2023-tabla-de-paises

Rheingold, H. (2004). *Multitudes inteligentes (smart mobs): La próxima revolución social.* Gedisa.

Rodríguez Rodríguez, A., & Díaz Anabitarte, A. (2014). Colour revolutions, nonviolence and social movements: Otpor in Serbia. *Revista CIDOB d'Afers Internacionals, 105*, 89–116.

Sahakyan, V., & Atanesyan, A. (2006). Democratization in Armenia: Some trends of political culture and behaviour. *Demokratizatsiya: The Journal of Post-Soviet Democratization, 14*(3), 347–354.

Sánchez-Duarte, J. M., & Magallón-Rosa, R. (2016). Estrategias de organización y acción política digital. *Revista de la Asociación Española de Investigación de la Comunicación, 3*(5), 9–16. https://doi.org/10.24137/raeic.3.5.2

The Republic of Armenia. (2000). *The Law of the Republic of Armenia on television and radio broadcasting.* https://parliament.am/legislation.php?sel=show&ID=1464&lang=eng

The Republic of Armenia. (2020). *Law of the Republic of Armenia on audiovisual media.* https://foi.am/u_files/file/legislation/Law%20of%20the%20Republic%20of%20Armenia%20on%20Audiovisual%20Media%202020.pdf

United Nations Development Programme. (2022). *Human development report 2021–2022: Uncertain times, unsettled lives: Shaping our future in a transforming world.* https://hdr.undp.org/content/human-development-report-2021-22

Vasallo, L. (2020). *Monitoring media pluralism in the digital era: Application of the media pluralism monitor in the European Union, Albania, and Turkey in the years 2018–2019. Country report: Malta.* European University Institute. https://cadmus.eui.eu/handle/1814/67811

Vella, N., Borg, J., & Lauri, M. A. (2023). Malta's media system from the perspective of journalists and editors. *Journalism Practice*. Advance online publication. https://doi.org/10.1080/17512786.2023.2199719

About the Authors

Patricia Izquierdo-Iranzo (PhD) is a senior lecturer in Media and Communication Sciences at Rey Juan Carlos University (Department of Audio-Visual Communication and Advertising), co-coordinator of the high-performance research group Guimedcom, and member of the Rey Juan Carlos University Unesco Chair in Communication. Her research focuses on meta-research in communication, digital society and social movements, and communication and cultural diversity. She has published her research in indexed scientific journals and leading publishing houses.

Lianna Sayadyan is an associate professor at the Faculty of Journalism (Department of New Media and Communication) of Yerevan State University, bringing with her over 20 years of teaching experience. Her teaching portfolio includes courses on reporting and writing, investigative reporting, and the history of modern media in Armenia. Her primary areas of interest and expertise lie in investigative reporting, media law and ethics, as well as fake news and misinformation.

cogitatio

ARTICLE

Media Systems and Media Capture in Turkey: A Case Study

Murat Akser [1] and Banu Baybars [2]

[1] School of Communication and Media, Ulster University, UK
[2] Faculty of Communication, Kadir Has University, Turkey

Correspondence: Murat Akser (m.akser@ulster.ac.uk)

Abstract

This article attempts to explain the current situation of the Turkish media system through the media systems approach as a case study with special attention to the concept of media capture. We propose that the Turkish media system's shift is heavily influenced by media capture. We associate four of Hallin and Mancini's media systems concepts related to the effects of media capture in the Turkish media system shift: rise of political parallelism, erosion of journalistic professionalism (ethics), controlling role of the state, and government-friendly ownership concentration. In explaining the shift from a pluralist polarised to captured media in Turkey, we acknowledge the potential for new, independent, and alternative media to emerge. The article also comments that the potential reason for this shift from a captured liberal to a captured media in Turkey is the climate of fear that has allowed successive governments in Turkey to attempt media capture. In general, this article attempts to provide insight into the current relationship between media and politics in Turkey.

Keywords

journalism; media capture; media systems; political parallelism; Turkey

1. Introduction

In our analysis of the recent shifts in the Turkish media system, especially since 2011, we will follow a roadmap. In Section 1, we explain Hallin and Mancini's media systems model, explain the relevant concepts like political parallelism and media pluralism, and point out similarities with the Turkish case and differences in other countries' media system case studies. We also explain why the concept of liberal media capture is relevant and complementary to understanding the reasons why the media system shift occurred in the

Turkish case. Section 2, describes the historical and current state of Turkey's media system, highlighting a shift from a previously identified Mediterranean model to a captured media system. Here, putting Hallin and Mancini's concepts to the test in the Turkish case, we look at how Turkish media's shift parallels the increase in political parallelism and erosion of the journalistic profession. In Section 3, we look at the result and discuss what happens after the shift. We conclude by reiterating that even when there is a high degree of political parallelism, an eroding sense of journalistic professionalism, and the controlling role of the state in the media system, there is still potential for alternative/independent media to emerge and disrupt the captured media system.

1.1. Media Systems Theory Research and Its Relevance in the Turkish Context

In 2004, Hallin and Mancini wrote a book on Western European and North American media systems within a political framework. They used the term "model" as a means of comparing media systems. As the authors later reiterate, this approach was not intended to be a prescriptive framework but open to interpretation and remodeling based on the different contexts outside Western Europe and Northern America (Hallin & Mancini, 2004, p. 6). This approach is further illustrated in Hallin and Mancini's (2012) edited volume, in which the authors explained that they wanted to avoid a universalizing approach. The authors also point out that to break the dominance of the West in global academia, more comparative interpretations are needed, questioning and revising their very own model (Hallin & Mancini, 2012, p. 1). In fact, the authors state that their model may experience "significant modification" when comparing media systems beyond the Western media (Hallin & Mancini, 2013, p. 17). Indeed, in their edited 2012 volume, they include case studies from Eastern Europe, the Middle East, Asia, Africa, and Latin America. The authors state that the choice of the countries was random and necessarily excluded some other media systems worldwide, such as Turkey (Hallin & Mancini, 2012, p. 2).

In their original work, Hallin and Mancini present three models: the Mediterranean or pluralized polarised model, the North/Central European or democratic corporatist model, and the North Atlantic or liberal model. The authors stress the later development of capitalist industrialization and political democracy in Southern European countries and their relatively late liberalization of the press compared to Western countries (Hallin & Mancini, 2004, p. 89). The authors point out that the French media system at the time was a borderline case between polarised pluralist and democratic corporatist models. This approach also inspires our case study as the Turkish media system has now shifted to such an in-between borderline case. Here, the term polarised pluralist, which they use to define the Mediterranean model, owes its existence to political scientist Giovanni Sartori, when there are political parties present but on extremely different ends of the spectrum. Hallin and Mancini adapt this concept when classifying countries' media using a media systems conceptual framework with four dimensions. These dimensions include media market structure, political parallelism, professionalization of journalism, and the role of the state. Similarly, and in addition to the four dimensions related to media systems, there are also five dimensions of the political contexts of media systems. These include the role of the state, democracy type (majoritarian vs. consensual), type of pluralism (individual vs. organized), degree of rational lawmaking/legal authority, and degree of pluralism (polarized vs. moderate).

Of the four dimensions they use to describe media systems, political parallelism is a dimension relevant to our analysis of the Turkish case. It refers to the idea that "media in some countries have distinct political orientations" (Hallin & Mancini, 2004, p. 27). The authors present five indicators to assess the extent of political parallelism. First is the degree to which media reflects different political orientations and the

orientation and professional practice of journalists. Second is the institutional links between media and political parties. Third is the engagement of media workers as political actors. Fourth is whether the career advancement of media personnel depends on political affiliations, and fifth is the media audiences' partisanship (Hallin & Mancini, 2004, pp. 26–33). A high degree of political parallelism does not necessarily point to a compromised democracy. Polarized pluralist media systems, for instance, are characterized by a lively public sphere, high voter turnout, strong citizen-party attachment, and political participation (Hallin & Mancini, 2004, p. 281). A shift towards a more illiberal and controlled media can occur for such a media system if its political system changes, such as transitioning from a parliamentary system to a presidential system, as is the case for Turkey.

Intersecting with this media system dimension, the political context dimension of media pluralism is an important political variable. Media pluralism determines the availability of various media outlets that can channel differences of opinion on political matters. Based on this, a media system can have a high or low degree of internal or external pluralism. Internal pluralism means a plurality of voices, analyses, and expressed opinions and issues. External pluralism is a plurality of media outlets, types of media (print, radio, TV, or digital), and the coexistence of privately owned media and public service media (Reporters Without Borders, 2016). Hence, internal pluralism is the plurality of voices, opinions, and analyses in media systems. It is a media system's ability to cover different opinions and perspectives. External pluralism is the coexistence of different and diverse types of media/ownership (private/state), which means covering different opinions and perspectives. Mancini mentions that the concept of political parallelism is less clear than that of press/party parallelism (Mancini, 2012, p. 271). Compared with party/press parallelism, what seems to be missing in political parallelism is the party itself, and in the Turkish case, the Justice and Development Party (AKP) and its affiliates aim to control media content (Akser, 2018; Topak, 2017; Yıldırım et al., 2021).

The second important dimension is the degree of professionalization of journalism. Here, professionalization refers to the continuum of independent to instrumentalized journalism. Do the journalists have a degree of autonomy, or are they controlled by media bosses? Is there a development of distinct professional norms and rules, such as ethical principles, and a means to enforce them? Are the journalists oriented toward public service rather than the interests of individual politicians? The idea of media instrumentalization used in *Comparing Media Systems* was intended as "the control of the media by outside actors—parties, politicians, social groups or movements or economic actors seeking political influence—who use them to intervene in the world of politics" (Hallin & Mancini, 2004, p. 37). Instrumentalization and media capture discussed next are seen as the negative aspects of political parallelism as they undermine the liberal and pluralist tendencies in the Mediterranean model.

The third dimension is the role of the state. This dimension stresses the power the political system has in shaping the structure and functioning of a media system (Hallin & Mancini, 2004, pp. 41–44), "but there are considerable differences in the extent of state intervention as well as in the forms it takes" (Hallin & Mancini, 2004, p. 41). Hallin and Mancini use the following variables to cover this fourth dimension: Is there censorship or other types of political pressure? Are certain media outlets endowed with the government's economic subsidies? Who owns/controls ownership of media and telecommunication regulatory agencies? How restrictive are regulations for the media, such as laws and licensing? Is the state the "primary definer" of news? Alongside the change in a country's political system, media capture allows for a shift towards media control and instrumentalization.

Media capture is a government's control of media outlets and the direct dictation of the content by the political elites in power due to regulatory or financial takeover of media organizations. Media capture implies a direct manipulation of news through suppression or even fabrication of false news, and in a more indirect manner through biased reporting (Prat, 2015, p. 669).

The specific type we are looking at is liberal media capture. The concept of the "captured-liberal media model" has been developed through the research of Guerrero and Márquez-Ramírez (2014) in the context of media in Latin America. In their landmark study, *Media Systems and Communication Policies in Latin America*, the authors focused on media ecosystems in Latin America that included Argentina, Bolivia, Brazil, Chile, Colombia, El Salvador, Guatemala, Mexico, Peru, and Venezuela. In this context, they proposed the captured-liberal media model, defined as "liberal" as "it keeps the formalities of a predominant commercial media system," and they defined captured media as "due to its late development under historical circumstances that made them dependent on governments and public funding, it subordinated the media system from the start" (Guerrero & Márquez-Ramírez, 2014, p. 59). Hence, the case studies of Latin American countries revealed a similar situation to that of the Turkish media concerning the captured-liberal model. In this model, there are core aspects of the political system that affect the media, such as "the degree of closeness between new ruling politicians and traditional media groups" and "the historical trend toward clientelism" (Guerrero & Márquez-Ramírez, 2014, p. 59). This also exists in the Turkish case, as discussed in Section 2. Similarly, two core fields of the media system affected by the political system are "low quality of regulatory efficiency" and "high degree of interference on the media's watchdog role," which persist in the Turkish case (Guerrero & Márquez-Ramírez, 2014, p. 59).

There is further empirical evidence and literature on media capture and how it expanded over the last decade across Europe. Enikolopov and Petrova (2015) examine the evidence on the effect of media capture on the content of media outlets. They identify the methods governments and other special interests use to control media, along with the determinants of media capture and the factors that affect the likelihood of media capture (Enikolopov & Petrova, 2015). They present evidence on the effects of captured media on people's behavior, as well as the effects of independent media in a captured environment, all of which are relevant in the Turkish case. Direct provision of money from the government through government-sponsored advertising is one of the methods used to ensure that media coverage is favorable to incumbent politicians (Di Tella & Franceschelli, 2011).

Media regulation is another method governments use to affect media coverage, where defamation laws are important determinants of media coverage of corruption in Mexico (Stanig, 2015). Media capture can lead to a situation in which some politicians have abundant access to broadcast time while others rarely have the same opportunity (Starr, 2004). In Italy, politicians from the Berlusconi party had a higher probability of appearing on public TV when Berlusconi was in power (Durante & Knight, 2012). Commercialization of the news is an important factor that affects newspaper content in China. Their results imply that newspapers that depend more on commercial revenues and are less directly controlled by the Communist Party are less likely to report low-level corruption (Qin et al., 2018). Increased income inequality is associated with lower media freedom and this effect is driven by the incentives of rich elites to manipulate public opinion and prevent redistribution (Petrova, 2008).

Another determining factor for media capture is the regime's stability, as governments facing threats to their power have stronger incentives to control the media (VonDoepp & Young, 2013). A number of empirical works

demonstrate that captured media can have a significant effect on people's behavior. For example, exposure to Serbian radio increased voting for extreme Croatian nationalist parties and open expression of nationalism (DellaVigna et al., 2014). In a recent example, Faris et al. (2023, p. 1) reveal in their study of the media of Iraqi Kurdistan that "media regulatory authorities and governmental bureaucracy use both formal and informal instruments and practices at their disposal to regulate press freedom" which is similar in Turkish government's attempts to control media through regulatory practices.

2. The Media System in Turkey

2.1. A History of Turkish Media System: Oscillating Between Relative Freedom and Total Control

Hallin and Mancini's 2004 book and their 2012 edited volume further inspired our case study, especially the case studies on Poland and Brazil in the latter volume. For example, the case study on Poland refers to the country's "Italianization/Mediterraneanization" (Dobek-Ostrowska, 2011). This is a useful frame of analysis in comparing historical shifts within a decade in other countries like Turkey, as the Turkish media system is very much described as fitting into the Mediterranean model (Kaymas, 2011). The Polish case study by Dobek-Ostrowska (2011) is built on previous conceptualizations and frameworks of the "Italianization of media" by Goban-Klas (1997) and the "Mediterraneanization" concept developed by Jakubowicz (2008). Goban-Klas explains the Italian media system through these four qualities:

> State control over the media such as direct control over TV and indirect control over the press, political party influence on the media coverage and how the media organizations are structured, that there is a high degree of integration of the media and political elites, and that the ethical divisions exist between journalists. (Goban-Klas, 1997, p. 40)

By studying case studies such as those in Poland, we can explain in Section 2.2 how the Turkish media system also shows a shift in some of these qualities today. Furthermore, Jakubowicz's analysis of the Mediterraneanization of Polish media points out that such media systems share qualities similar to those of Mediterranean countries. Countries such as Poland also went through recent democratization coming out of the Soviet era in the 1990s. Similarly, as in the Polish case study, Turkey also went through the EU process and democratization; there is uneven economic development with periodic financial crises and a weak rational-legal authority with a strong direct influence of the state.

De Albuquerque (2011) applies the media systems method to the Brazilian media system. He identifies two points where the Brazilian media system can update Hallin and Mancini's theory. The first is the existence of central and peripheral media systems to the extent that they define themselves concerning foreign models. The second point is the importance of the system of government in determining the media system model, that is, whether it is presidential or parliamentary. This is an important variable that explains some traits of the relationship between the media and the political agents (De Albuquerque, 2011, p. 72). Both of these points also help us interpret the Turkish media system.

When we even attempt to frame Turkish media along these terms, we start with the history of the media system in Turkey. Media in Turkey did not come from the grassroots bourgeoisie but started with an official gazette in the 1800s (Kaya & Çakmur, 2010, p. 523). Then, the relative liberalization of politics during the

empire and after the declaration of the Republic in 1923 witnessed the emergence of a semi-autonomous independent press that sometimes attempted to criticize the government and keep it in check (Akser & Baybars, 2012).

When we put Hallin and Mancini's media markets (first dimension) into a test for Turkish media, we recognize a pattern in the media systems structure of media markets. The structure of media markets is informed by the growth of a mass circulation of print press. To classify the Turkish media system under the polarised pluralist model, Hallin and Mancini mention certain variables to evaluate the qualities of media systems. These qualities match the Turkish media system since its inception. Turkish print and broadcast media moved from a government-operated to a more liberal model in the 20th century and later went back to a more government-controlled model (captured-liberal) in the 21st century (Karlıdağ & Bulut, 2021). Turkish newspapers were few in the early years of the Republic (1920s–1930s) but proliferated with the end of WWII, especially with the introduction of multi-party politics and the change of governments through free elections in 1946 (Adaklı, 2009).

Between the 1980s and 2000s, there were high newspaper circulation rates when newspaper circulation reached the millions for some newspapers such as *Hürriyet*, *Milliyet*, *Sabah*, and *Tan*, and daily readership rates of newcomer newspapers like *Radikal* and *Sözcü* still remained high through the 1980s–2000s (Öncü, 2010). With the internet and digitization of newspapers, along with pressures on the critical editors and post-Gezi Park repression of media, the circulation numbers of some of these newspapers plummeted. Here, a dimension Hallin and Mancini failed to predict was how transformations in media technologies could lead to the formation of new aspects of media, such as the rise of online independent media as a counterbalance. All of these above-mentioned newspapers now have online versions and social media accounts where they can reach millions while the print versions remain in the thousands of sales (Yeşil, 2018).

The newspaper-readership relationship aspect and the appeal for mass-orientation vs. elite aspect have existed in Turkey since the 1940s. The pundit/columnists were usually the chief editors of newspapers like Nadir Nadi (*Cumhuriyet*), Sedat Simavi (*Hürriyet*), and Abdi İpekçi (*Milliyet*). These individuals not only commanded huge influence in the politics of the country but they were also themselves journalists and sometimes owners of the daily newspapers (Topuz, 2003). The shift of ownership to media moguls who had interests in other businesses led to conglomeration and de-unionization in Turkish media (Yeşil, 2016). Another point the authors make is about the relative importance of newspapers and TV as news sources. The importance of news via print newspapers has waned and shifted to TV news since the 1980s. There was a period of relatively harmless coexistence in the 1980s and 1990s, but the balance shifted towards the consumption of TV news (and later social media/mobile news; Polat et al., 2018).

Since the 1980s, media moguls have entered the media business, and those who own both print and TV news outlets are in a position to shape the public agenda for or against the government of the time. The sensationalist headlines of the 1990s that toppled governments motivated successive AKP and Erdoğan governments to gain greater control over the media (Yanardağoğlu, 2021).

Another quality in the Turkish media system is the existence of strong national newspapers due to the centrist nationalist orientation of the Turkish political and administrative structures. The degree of separation between sensationalist mass press and quality press existed to a degree until the 1980s when dailies such as *Cumhuriyet*,

Milliyet, and *Hürriyet* were considered more serious newspapers, and *Tan* was more sensationalist (Barutçu, 2004). This separation is no longer clear as major newspapers and TV news outlets pump out sensationalist news to avoid hard political and critical discussions unfavorable to the current Turkish government (Bek, 2004). In stark contrast, through the 1990s, Turkey had journalists working for privately owned media (outside direct state interference) who were able to question the government's agenda, corruption, and undemocratic actions. This period featured a plurality of voices—newspapers, private TV channels, and columnists like Can Dündar— who later became news anchors for a range of TV channels that were able to make monthly programs that criticized the Turkish government between 1995 and 2016. After government interference, Can Dündar lost his job and had to live abroad as a political refugee (Dündar, 2016).

The current media in Turkey circa 2023 is far from the pluralist side of the proposed model (Herrero et al., 2017; Simaku, 2021; Sözeri, 2013). It is instead a hybrid, shifting model changed by an authoritarian government that used media capture and other tools at their disposal, such as state subsidy of private media (Akser & Baybars, 2023). Over time, especially post-2011, the Turkish government became more illiberal and used extensive media capture methods to create favorable media (see Panayırcı et al., 2016; Uce & De Swert, 2010). The Turkish media system is a shifting model that can be defined by three strong characteristics: a high degree of political parallelism, a polarised media with eroding journalistic professionalism, and government-captured/controlled ownership concentration supported by indirect subsidies with a strong degree of state regulatory control of media content (Coşkun, 2020; Yanatma, 2021). This model also has an important characteristic: It is an oscillating model that can enjoy periods with a relatively free press and then be a highly captured and regulated state-controlled system at other times. It is a media system that has shifted towards an illiberal stance due to media capture.

2.2. The Shift in Media System in Turkey

The shift in the media landscape in Turkey happened mostly through media capture. The AKP government and Erdoğan regime were able to bend the laws to their advantage to take over the media (regulatory capture) and impose restrictions on journalists (Yeşil, 2014). The economic collapse of 2001 and AKP's successful adaptation of the IMF regulatory framework allowed them to capture media outlets from business owners who opposed the AKP government or may have potentially been political rivals (Esen & Gumuscu, 2018). This happened in the case of Cem Uzan, who owned around a third of media outlets in Turkey; Uzan's newspapers and TV stations (Star) had been actively criticizing AKP and PM Erdoğan (Yıldırım et al., 2021, p. 332).

The last 20 years of the Turkish Republic have witnessed media control of dictatorial proportions (Coşkun, 2020). The intimidation tactics against media reporters and owners range from media capture to imprisonment (Eldem, 2017). Hate speech is built and spread in Turkish media along the lines of a culture war of us vs. them creating and promoting actors of oppression and victims (Arcan, 2013). Such hate speech by deployed journalists targets opposition party members, protesters of environmental and workers' rights movements, students, and workers seeking their rights (Ataman & Çoban, 2019). The institutional system of intimidation can operate top-to-bottom political coordination at the highest level (Cumhurbaşkanlığı İletişim Merkezi/President's Communication Office) or an arm's-length through an NGO (The Pelican Group) and discreetly—such as through individual trolls being on the government payroll (Ezikoğlu, 2023). The political/informal networks of attack include the use of government-paid internet trolls who actively implement these intimidation tactics (Saka, 2018).

3. Qualities of the Media Shift in Turkey

3.1. Political Parallelism

Hallin and Mancini present political parallelism as an indicator of a partisan press along political party lines. A media system under high parallelism would harbor a tendency to highly politicize public opinion, which may, by design, result in polarization at the ballot level (Hallin & Mancini, 2004, p. 27). Hallin and Mancini (2004, pp. 26–33) proposed multiple indicators to assess the extent of political parallelism, some of which existed and intensified in the Turkish media system since 2011. Among them, the most prominent is the "organizational connections between the media and political organisations" (Hallin & Mancini, 2004, p. 28) that AKP and the captured media have; "the tendency of media personnel to take part in political life" (Hallin & Mancini, 2004, p. 28) as AKP's embedded journalists report favorably on the government; and "journalists' role orientation and practices" (Hallin & Mancini, 2004, p. 28), which are biased towards the government. The last part is especially important as it is about how journalists view their roles in checking government power, whether it is opinion-oriented or information-oriented reporting style, which is able/unable to separate/blend commentary and information.

Researchers such as Bayram (2010) have interpreted this tendency as historical and endemic in Turkish media. The author's holistically long-range evidence asserts that political parallelism was high during the single-party era (1930s–1940s) and progressively declined through the 1960s–1980s. However, it increased in the 1990s (Bayram, 2010, pp. 588–589). Çarkoğlu and Yavuz (2010, p. 616) explain that the level of partisanship for readers of major newspapers in Turkey is increasingly polarised due to the conglomeration and creation of government-biased media that works as a propaganda tool. Hence, once eroded, pluralism in a media system can lead to hyper-political parallelism eclipsing previous media polarization. The strengthening of one-party/one-man rule in Turkey resulted in "the decline in media independence and the emergence of an 'advocate/partisan' (yandaş) media" (Çarkoğlu & Yavuz, 2010, p. 617).

Furthermore, after the deregulation of media markets, newspaper owners in Turkey started to utilize the material benefits of the "patrimonial/clientelistic" relationship between media and the state through government subsidies (Yanatma, 2021). Government-friendly media outlets such as Demirören Media "have connections to obtain government contracts and concessions" in this kind of relationship (Hallin & Mancini, 2004, pp. 58–59). Hence, the Turkish media system has shifted towards increasing political parallelism after media capture. Media commercialization leads to government interference, which in turn leads to capture. As a result, the ties between media and political institutions increase (Çarkoğlu et al., 2014, p. 299).

3.2. Media Capture

The conglomeration and de-unionization between 2002 and 2011 and later media capture since 2011 shifted the Turkish media system from being closer to the Mediterranean model to a transitioning/shifting media system. The query into such a shift in the Turkish media system lies in the two dimensions Hallin and Mancini (2004) mention in their work: change of market structures and state interference in how media outlets are run. The structure of media markets is about the changes after media capture that make the news-making process more favorable towards government policies. After media capture, newspaper circulation rates fell, and their opponents' alternative social media presence exploded (Ataman & Çoban,

2023). The newspaper-readership relationship also lost its mass orientation as alternative media became the primary source of "independent news" (Akser & McCollum, 2019). New online and independent media outlets such as *T24*, *P24*, and *Gazeteduvar* attract millions of online readers daily, whereas the government-sponsored propagandist-style newspapers appeal to a more limited, polarised elite readership (Ataman & Çoban, 2023).

Turkey's shifting media system has witnessed the state's increasing role in using state advertising to support friendly media (Yanatma, 2021). This dimension of Hallin and Mancini's model stresses the power of the political system in shaping the structure and functioning of a media system. As the authors state, "there are considerable differences in the extent of state intervention as well as in the forms it takes" (Hallin & Mancini, 2004, p. 41). In the Turkish case, the media system shifted towards a more negative model. Hallin and Mancini (2004) use these variables to explain such a move: censorship or other types of political pressure increases, which leads to media capture; the captured/now friendly media is endowed with economic subsidies, and those who resist experience repressive regulation. Eventually, as in the Turkish case, the state becomes the main information source and attempts to become the "primary definer" of news, as in the case of the politically motivated use of the government-owned Anatolian news agency (Irak, 2016).

The state's role changed significantly after the policy changes of the AKP government's post-2011 elections. The Turkish state moved from a liberal democracy and welfare state to a more repressive/authoritarian and wild capitalist state where nearly all public services are commercialized (health, school, and even defense; Esen & Gumuscu, 2018). Increasingly, the state has interfered with the free market activity of media through media capture, coercion, and repressive regulation. This move in Turkish politics also indicates the government's attempts to control and support private media business (Sözeri, 2013; Yeşil, 2016).

Turkish media was regarded as playing an important role in the country's long and hard road to democracy. The research into journalistic attitudes points to the desire for a more consensual than a majoritarian democracy (Arat & Pamuk, 2019). AKP and President Erdoğan built a majoritarian political system, an illiberal democracy where one party dominated the policy decisions, often bypassing the parliament and opposition parties' recommendations (Esen & Gumuscu, 2021). The separation of power between legislative, executive, and legal branches of the state has now been erased through unlawful acts by President Erdoğan, such as not recognizing constitutional court orders, not implementing them, and insisting on legislating unconstitutional decrees (Samson & Güler, 2023). There is no longer polarised pluralism but pure polarisation at all times in a low consensus; the political system's legitimacy is challenged by the opposition at all times, and deep cleavages within the political landscape took firm hold election after election. The media is used to polarize the opposition parties and their public supporters through culture wars (Kulturkampf; Özçetin, 2019). The reshaping of Turkey's media through capture is indicated in Table 1.

As can be seen in Table 1, Cem Uzan Star was the first to change hands in 2007 followed later by the sale of Doğan Media in 2018. In some cases, such as *Star* and *Haberturk*, the media changes hands twice, and in each case, to government-friendly business owners. This kind of media capture does not guarantee profits. It is also risky for business owners like Erdoğan Demirören, who had to borrow a billion USD from two government banks, a loan he was unable to pay back even after six years (Akser & Baybars, 2023).

Table 1. News media outlets and media capture in Turkey.

Newspaper	TV ownership/affiliation [1]	Ownership change [1]	Ideological shift
Star	StarTV	From Cem Uzan to Doğan Media and to Doğuş	Oppositional to pro-government
Hurriyet	Kanal D	From Doğan Media Group to Demirören Media (Pitel, 2018)	Neutral to pro-government
Milliyet	CNNTürk	From Doğan Media to Demirören Media (Bucak, 2018)	Neutral to pro-government
Sabah	ATV	From Bilgin/Çukurova to Çalık to Turkuvaz Media Group	Neutral to pro-government
Habertürk	Habertürk	Ciner Group (no change)	Neutral
Yeni Safak	N/A	Albayrak Group (no change)	Pro-government
Sozcu	SözcüTV (as of 2023)	Burak Akbay (no change, post-2013 newspaper)	Oppositional
Turkiye	TGRT-Fox-FoxTV	İhlas Group (no change, but FoxTV is sold and now independent/oppositional)	Pro-government
Cumhuriyet	N/A	Cumhuriyet Foundation	Oppositional
Taraf	N/A	Alkım Yayıncılık	Pro-government until 2013, changed to oppositional (closed by government decree in 2016)
Zaman	IrmakTV/Cihan Agency	Feza Group	Pro-government until 2013, changed to oppositional (closed by government decree in 2016)

Source: [1] Bayram (2010), Yıldırım et al. (2021).

3.3. Eroding Sense of Journalistic Professionalism

As a result of media capture, the eroding sense of journalism as a profession increased in Turkey (Liazos, 2023). We have already mentioned the potential for political instrumentalization of vulnerable journalists after media capture. The development of distinct professional norms, rules, and ethical principles, as well as whether journalists view their profession as a public service, is affected negatively after such a capture (Hallin & Mancini, 2004, pp. 33–41). As a result of this capture, the Turkish media system shifted from being viewed as more of an ethics-oriented public service to a paid profession that serves certain interests for pay. The memoirs of chief editors of the top five newspapers that changed ownership illustrate that these editors and the journalists who were fired alongside them between 2007 and 2016 had a high degree of professional ethics, integrity, and idealism (see memoirs by former newspaper chief editors Çölaşan, 2007; Dündar, 2016; Sazak, 2014). They were replaced by friendly journalists who brag about being a mouthpiece for the AKP government. Examples of such journalists include Abdulkadir Selvi (a columnist installed in *Hürriyet Daily*) or Rasim Ozan Kütahyalı, who admitted to fabricating fake news to erode trust in the opposition parties ("Rasim Ozan Kütahyalı'dan," 2022). Most of these fired journalists later established new alternative media portals or left Turkey to continue their profession abroad more freely (Bulut & Ertuna, 2022). In Table 2 is the summary of the change in Turkish media after capture.

Table 2. Media Shift in Turkey.

Dimensions	Hallin and Mancini (2004) Mediterranean or polarised pluralist model	Turkeys captured and shifting media system (2024)
Newspaper/media industry	Low newspaper circulation and elite politically oriented press	Drop from high newspaper circulation to high online alternative media (Akser & McCollum, 2019) The commercial press becomes state-controlled (Yeşil, 2016) Rapid transition to broadcast and internet media (Hoyng & Es, 2017)
Political parallelism	High political parallelism, external pluralism, commentary-oriented journalism, parliamentary model of broadcast governance, and politics-over-broadcasting systems	An increase in political parallelism (Bayram, 2010) capture leads to new external and internal pluralism in the national press (İnceoğlu et al., 2020), more polarisation (Evans & Kaynak, 2015), historically oscillates between neutral commercial press and controlled/censored press (Arsan, 2013), and attempts at politics-in-broadcasting system with various degrees of autonomy and relapse into censored media (Kaya & Çakmur, 2010)
Professionalization	The instrumentalisation of journalism, once highly professionalised	Erosion of journalistic standards (Simaku, 2021) Failed attempts at institutionalized self-regulation (Liazos, 2023) Deeper instrumentalization (Ural, 2023)
Role of the state in media system	Strong state intervention, press subsidies, periods of censorship, deregulation, and strong public-service broadcasting initially	Strong state intervention but with no protection for press freedom (Farmanfarmaian et al., 2018) Press subsidies to supporters only Commercialization of broadcasting (Bulut, 2023)

As seen in Table 2, the changes in media type (from print/broadcast to digital) also coincide with the media capture in Turkey. Hence, the captured and controlled media are now legacy media, and the newly organized independent media are the more widely followed alternative media (Akser & McCollum, 2019). As political parallelism increases in the newly captured media, journalism standards go lower, and biased news leads to polarisation in the audience.

4. Conclusion

This article has attempted to describe a recent shift in Turkish media with reference to Hallin and Mancini's conceptualization of media systems and found it to result from increased political parallelism based heavily on media capture since 2011. We surveyed relevant literature and found that three of Hallin and Mancini's media systems concepts and analysis framework stand out in the Turkish media system shift: the increase in political parallelism, changes in journalistic professionalism (ethics), and an increased role of the state and

ownership concentration. Considering domestic political factors, we recognize that a climate of fear plays a role in successive Turkish government's efforts to control the media (Celik, 2020).

As a result of media capture, there is increased potential for biased news reporting and disinformation. We can increase the number of recent examples of biased coverage of news items by news media during the 2019 Istanbul Mayoral elections, the 2020–2021 Covid-19 pandemic (early news items included that the virus was too weak and that it did not affect Turkey, it being a nation with strong genes; Kalaycı, 2023). In one case, the online version of a news item showed a photoshopped İmamoğlu posing with Israeli PM Netanyahu to portray him negatively (such news items are later debunked by fact-checking portals such as teyit.com). There have been no apologies or corrections by these news outlets, even when there are court orders for them to do so. As it stands in the Turkish context, media capture leads to fake news and the winning of elections by the Erdoğan regime.

Looking at the captured media (ATV/*Sabah*, CNNTürk/Kanal D/*Hürriyet*) during election coverage since 2011, we see that these newspapers used a variety of tactics in their spreading of fake news against the oppositional candidate (Kalaycı, 2023). The erosion of journalistic standards led to the increasing use of discursive tools such as false reporting, photo-defaming, and constant hate rhetoric against political opponents of President Erdoğan. This hate rhetoric includes accusations of separatism, terrorism sympathy, Zionism, and atheism, which are used to create divisions within the electorate for political gain by these media outlets (Yilmaz & Erturk, 2023).

In concluding thoughts, we witness that the shift in the media system in Turkey is a result of media capture. The themes selected to attack AKP's political opponents, whether it is general elections (such as Kemal Kılıçdaroğlu), presidential elections (Muharrem İnce, Selahattin Demirtaş, or Meral Akşener), or municipal elections (Ekrem İmamoğlu, Mansur Yavaş, or Tunç Soyer) do not change. They are based on the creation of imaginary shadowy enemies outside who use domestic enemies on the inside. Hence, the pejoratively used, politically incorrect accusations can range from being a coup supporter, a Zionist, dönme (a Christian convert to Islam), being un-domestic/alien, and un-patriotic/traitor (Melek & Müyesseroğlu, 2023). This accusatory tone is a prominent feature of every one of Erdoğan's us vs. them tirades under the term yerli-milli, which is local-national. Such paranoid, delusional news reporting can even take farcical tones, as in a misunderstood social media commercial on the internet ("Ülker'in 1 Nisan reklamı," 2017).

In conclusion, media capture is an important element in discussing political parallelism in the Turkish case. It can lead to the erosion of journalistic values and create a biased media artificially propped up by government subsidies. Turkey's politically restrictive climate has led to the development of independent online media, which are providing alternatives with increasing potential to disrupt the shift in the Turkish media system.

Conflict of Interests

The authors declare no conflict of interests.

References

Adaklı, G. (2009). The process of neo-liberalization and the transformation of the Turkish media sector in the context of the new media architecture. In J. Harrison & B. Wessels (Eds.), *Mediating Europe: New media, mass communications* (pp. 286–318). Berghahn Books.

Akser, M. (2018). News media consolidation and censorship in Turkey: From liberal ideals to corporatist realities. *Mediterranean Quarterly*, *29*(3), 78–97.

Akser, M., & Baybars, B. (2012). Media and democracy in Turkey: Toward a model of neoliberal media autocracy. *Middle East Journal of Culture and Communication*, *5*(3), 302–321. https://doi.org/10.1163/18739865-00503011

Akser, M., & Baybars, B. (2023). Repressed media and illiberal politics in Turkey: The persistence of fear. *Southeast European and Black Sea Studies*, *23*(1), 159–177. https://doi.org/10.1080/14683857.2022.2088647

Akser, M., & McCollum, V. (Eds.). (2019). *Alternative media in contemporary Turkey: Sustainability, activism, and resistance*. Rowman & Littlefield.

Arat, Y., & Pamuk, Ş. (2019). *Turkey between democracy and authoritarianism*. Cambridge University Press.

Arcan, H. E. (2013). Interrupted social peace: Hate speech in Turkish media. *The IAFOR Journal of Media, Communication and Film*, *1*(1), 43–56. https://doi.org/10.22492/ijmcf.1.1.04

Arsan, E. (2013). Killing me softly with his words: Censorship and self-censorship from the perspective of Turkish journalists. *Turkish Studies*, *14*(3), 447–462. https://doi.org/10.1080/14683849.2013.833017

Ataman, B., & Çoban, B. (2019). Turkey: How to deal with threats to journalism? In E. Eide, K. Skare Orgeret, & N. Mutluer (Eds.), *Transnational othering, global diversities: Media, extremism, and free expression* (pp. 171–190). Nordicom.

Ataman, B., & Çoban, B. (2023). Cracks in the wall: Alternative journalism in Turkey. In B. Mutsvairo, S. Bebawi, & E. Borges-Rey (Eds.), *The Routledge companion to journalism in the Global South* (pp. 220–229). Routledge.

Barutçu, İ. (2004). *Babıali tanrıları simavi ailesi*. Destek Yayınları.

Bayram, S. (2010). Political parallelism in the Turkish press, a historical interpretation. *Turkish Studies*, *11*(4), 579–611. https://doi.org/10.1080/14683849.2010.540115

Bek, M. G. (2004). Research note: Tabloidization of news media—An analysis of television news in Turkey. *European Journal of Communication*, *19*(3), 371–386. https://doi.org/10.1177/0267323104045264

Bucak, S. (2018, May 30). Dogan Media sale to Erdogan ally is blow to press freedom. *Financial Times*. https://www.ft.com/content/3273aafc-4317-11e8-97ce-ea0c2bf34a0b

Bulut, E. (2023). Eventocracy, affective supremacy and resistance in Turkey's captured media ecology. *Middle East Journal of Culture and Communication*, *16*(2), 132–152. https://doi.org/10.1163/18739865-01602004

Bulut, E., & Ertuna, C. (2022). The pandemic shock doctrine in an authoritarian context: The economic, bodily, and political precarity of Turkey's journalists during the pandemic. *Media, Culture & Society*, *44*(5), 1003–1020. https://doi.org/10.1177/01634437221084108

Çarkoğlu, A., Baruh, L., & Yıldırım, K. (2014). Press-party parallelism and polarization of news media during an election campaign: The case of the 2011 Turkish elections. *The International Journal of Press/Politics*, *19*(3), 295–317. https://doi.org/10.1177/1940161214528994

Çarkoğlu, A., & Yavuz, G. (2010). Press–party parallelism in Turkey: An individual level interpretation. *Turkish studies*, *11*(4), 613–624. https://doi.org/10.1080/14683849.2010.540116

Celik, B. (2020). Screening for Erdoğanism: Television, post-truth and political fear. *European Journal of Communication*, *35*(4), 339–354. https://doi.org/10.1177/0267323120903680

Çölaşan, E. (2007). *Kovulduk ey halkım unutma bizi*. Bilgi.

Coşkun, G. B. (2020). Media capture strategies in new authoritarian states: The case of Turkey. *Publizistik*, *65*, 637–654. https://doi.org/10.1007/s11616-020-00600-9

De Albuquerque, A. (2011). On models and margins. In D. C. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 72–95). Cambridge University Press.

DellaVigna, S., Enikolopov, R., Mironova, V., Petrova, M., & Zhuravskaya, E. (2014). Cross-border media and nationalism: Evidence from Serbian radio in Croatia. *American Economic Journal: Applied Economics*, *6*(3), 103–132. https://doi.org/10.1257/app.6.3.103

Di Tella, R. D., & Franceschelli, I. (2011). Government advertising and media coverage of corruption scandals. *American Economic Journal: Applied Economics*, *3*(4), 119–151. https://doi.org/10.1257/app.3.4.119

Dobek-Ostrowska, B. (2011) Italianization of the Polish media system? Reality and perspective. In D. C. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 26–50). Cambridge University Press.

Dündar, C. (2016). *We are arrested: A journalist's notes from a Turkish prison*. Biteback Publishing.

Durante, R., & Knight, B. (2012). Partisan control, media bias, and viewer responses: Evidence from Berlusconi's Italy. *Journal of the European Economic Association*, *10*(3), 451–481. https://doi.org/10.1111/j.1542-4774.2011.01060.x

Eldem, T. (2017). The transformation of the media sector from above: Implications for the freedom of the media in Turkey. In S. F. Krishna-Hensel (Ed.), *Authoritarian and populist influences in the new media* (pp. 83–115). Routledge.

Enikolopov, R., & Petrova, M. (2015). Media capture: Empirical evidence. In S. P. Anderson, J. Waldfogel, & D. Stromberg (Eds.), *Handbook of media economics* (Vol. 1A, pp. 687–700). North-Holland. https://doi.org/10.1016/B978-0-444-63685-0.00017-6

Esen, B., & Gumuscu, S. (2018). Building a competitive authoritarian regime: State–business relations in the AKP's Turkey. *Journal of Balkan and Near Eastern Studies*, *20*(4), 349–372. https://doi.org/10.1080/19448953.2018.1385924

Esen, B., & Gumuscu, S. (2021). Why did Turkish democracy collapse? A political economy account of AKP's authoritarianism. *Party Politics*, *27*(6), 1075–1091. https://doi.org/10.1177/1354068820923722

Evans, M., & Kaynak, M. S. (2015). Media framing in religious–secular conflict in Turkey and Israel. *International Political Science Review*, *36*(2), 139–152. https://doi.org/10.1177/0192512113512147

Ezikoğlu, Ç. (2023). CIMER in Turkey: A revolutionary platform for political participation or a tool for authoritarianism? *International Social Science Journal*. Advance online publication. https://doi.org/10.1111/issj.12485

Faris, J., Maeseele, P., Badran, Y., & Smets, K. (2023). Regulatory capture in a transitional democracy: Media laws in the Kurdistan Region of Iraq. *Communication Law and Policy*. Advance online publication. https://doi.org/10.1080/10811680.2023.2241449

Farmanfarmaian, R., Sonay, A., & Akser, M. (2018). The Turkish media structure in judicial and political context: An illustration of values and status negotiation. *Middle East Critique*, *27*(2), 111–125. https://doi.org/10.1080/19436149.2018.1447773

Goban-Klas, T. (1997). Politics versus media in Poland: A game without the rules. In P. O'Neil (Ed.), *Post-communism and the media in Eastern Europe* (pp. 24–41). Frank Cass.

Guerrero, M., & Márquez-Ramírez, M. (Eds.). (2014). *Media systems and communication policies in Latin America*. Springer.

Hallin, D. C., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (Eds.). (2012). *Comparing media systems beyond the Western World*. Cambridge University Press.

Hallin, D. C., & Mancini, P. (2013). Comparing media systems between Eastern and Western Europe. In P. Gross & K. Jakubowicz (Eds.), *Media transformations in the post-communist world: Eastern Europe's tortured path to change* (pp. 15–32). Lexington Press.

Herrero, L. C., Humprecht, E., Engesser, S., Brüggemann, M. L., & Büchel, F. (2017). Rethinking Hallin and Mancini beyond the West: An analysis of media systems in Central and Eastern Europe. *International Journal of Communication*, *11*, 4797–4823.

Hoyng, R., & Es, M. (2017). Conspiratorial webs: Media ecology and parallel realities in Turkey. *International Journal of Communication*, *11*, 4219–4238.

İnceoğlu, Y., Sozeri, C., & Erbaysal Filibeli, T. (2020). *Monitoring media pluralism in the digital era: Application of the media pluralism monitor 2020 in the European Union, Albania and Turkey in the years 2018–2019*. European University Institute. https://cadmus.eui.eu/bitstream/handle/1814/67821/turkey_results_mpm_2020_cmpf.pdf

Irak, D. (2016). A close-knit bunch: Political concentration in Turkey's anadolu agency through twitter interactions. *Turkish Studies*, *17*(2), 336–360. https://doi.org/10.1080/14683849.2016.1138287

Jakubowicz, K. (2008). Riviera on the Baltic? Public service broadcasting in post-communist countries. In B. Dobek-Ostrowska & M. Głowacki (Eds.), *Comparing media systems in Central Europe: Between commercialization and politicization* (pp. 41–54). University of Wroclaw Press.

Kalaycı, H. (2023). When fake news and personal experience contradict: Limits to post-truth in Turkey. *Southeast European and Black Sea Studies*, *23*(3), 589–605. https://doi.org/10.1080/14683857.2022.2115698

Karlıdağ, S., & Bulut, S. (2021). Turkish media and the root of the problems. *Global Media Journal: Turkish Edition*, *11*(22), 20–35.

Kaya, R., & Çakmur, B. (2010). Politics and the mass media in Turkey. *Turkish Studies*, *11*(4), 521–537. https://doi.org/10.1080/14683849.2010.540112

Kaymas, S. A. (2011). Media policy paradigm shift in Turkey: Rethinking neo-authoritarian media systems in the age of neo liberalism. *Acta Universitatis Danubius. Communicatio*, *5*(1), 40–69. https://www.researchgate.net/publication/265480685_Media_Policy_Paradigm_Shift_in_Turkey_Rethinking_Neo-_Authoritarian_Media_Systems_in_the_Age_of_Neo_Liberalism

Liazos, N. (2023). Media in Turkey during the period of the Justice and Development Party's (AKP) takeover of power. *Envisioning the Future of Communication*, *1*(1), 113–122. https://doi.org/10.12681/efoc.5338

Mancini, P. (2012). Instrumentalization of the media vs. political parallelism. *Chinese Journal of Communication*, *5*(3), 262–280. https://doi.org/10.1080/17544750.2012.701415

Melek, G., & Müyesseroğlu, E. (2023). Political storytelling of Ekrem İmamoğlu on Instagram during 2019 Istanbul mayoral elections in Turkey. *Visual Studies*, *38*(5), 894–910. https://doi.org/10.1080/1472586X.2021.1975501

Öncü, A. (2010). Rapid commercialisation and continued control: The Turkish media in the 1990s. In C. Kerslake, K. Öktem, & P. Robins (Eds.), *Turkey's engagement with modernity* (pp. 388–402). Palgrave Macmillan.

Özçetin, B. (2019). "The show of the people" against the cultural elites: Populism, media and popular culture in Turkey. *European Journal of Cultural Studies*, *22*(5/6), 942–957. https://doi.org/10.1177/1367549418821841

Panayırcı, U. C., İşeri, E., & Şekercioğlu, E. (2016). Political agency of news outlets in a polarized media system: Framing the corruption probe in Turkey. *European Journal of Communication*, *31*(5), 551–567. https://doi.org/10.1177/0267323116669455

Petrova, M. (2008). Inequality and media capture. *Journal of Public Economics*, *92*(1/2), 183–212. https://doi.org/10.1016/j.jpubeco.2007.04.004

Pitel, L. (2018, March 21). Turkish press baron agrees to sell media arm to Erdogan ally. *Financial Times*. https://www.ft.com/content/c4d3c3f0-2d2d-11e8-a34a-7e7563b0b0f4

Polat, V., Arcan, H. E., & Gezgin, S. (2018). *Türkiye sözlü basın tarihi cilt III*. Bankasi Kültür Yayınları.

Prat, A. (2015). Media capture and media power. In S. P. Anderson, D. Strömberg, & J. Waldfogel (Eds.), *Handbook of media economics volume* (Vol. 1A, pp. 669–686). North-Holland.

Qin, B., Strömberg, D., & Wu, Y. (2018). Media bias in China. *American Economic Review*, *108*(9), 2442–2476. https://doi.org/10.1257/aer.20170947

Rasim Ozan Kütahyalı'dan cüneyt özdemir'e: Kudret Köseoğlu karakterini ben yarattım, tüm mesuliyet benim, hedefim özkök'tü. (2022, October 21). *T24*. https://t24.com.tr/haber/rasim-ozan-kutahyali-dan-cuneyt-ozdemir-e-kudret-koseoglu-karakterini-ben-yarattim-tum-mesuliyet-benim-hedefim-ozkok-tu,1067198

Reporters Without Borders. (2016). *2016 World Press Freedom index—Leaders paranoid about journalists*. https://rsf.org/en/2016-world-press-freedom-index-leaders-paranoid-about-journalists

Saka, E. (2018). Social media in Turkey as a space for political battles: AKTrolls and other politically motivated trolling. *Middle East Critique*, *27*(2), 161–177. https://doi.org/10.1080/19436149.2018.1439271

Samson, A., & Güler, F. (2023, November 10). Erdoğan hits out at constitutional court as Turkey's judicial crisis deepens. *Financial Times*. https://www.ft.com/content/bafda53b-87bb-4480-8074-0cc91d4cab52

Sazak, D. (2014). *Batsın böyle gazetecilik*. Boyut.

Simaku, X. (2021). A comparative research between Italian and Turkish journalists: Professionalism, autonomy, clientelism, and ethic. *SAGE Open*, *11*(2), 1–10. https://doi.org/10.1177/21582440211010173

Sözeri, C. (2013). The political economy of the media and its impact on freedom of expression in Turkey. A. Avalos, H. Yilmaz, & A. I. Planet (Eds.), *Turkey's democratization process* (pp. 391–404). Routledge.

Stanig, P. (2015). Regulation of speech and media coverage of corruption: An empirical analysis of the Mexican Press. *American Journal of Political Science*, *59*(1), 175–193. https://doi.org/10.1111/ajps.12110

Starr, P. (2004). *The creation of the media: Political origins of modern communications*. Basic Books.

Topak, O. (2017). The making of a totalitarian surveillance machine: Surveillance in Turkey under AKP rule. *Surveillance & Society*, *15*(3/4), 535–542. https://doi.org/10.24908/ss.v15i3/4.6614

Topuz, H. (2003). *II. Mahmut'tan holdinglere Türk basın tarihi*. Remzi.

Uce, V., & De Swert, K. (2010). Introducing Turkey to the three media system models: The content of TV news in eleven countries. In D. Dobek-Ostrowska (Ed.), *Comparative media systems: European and global perspectives* (pp. 63–76). Central European University Press.

Ülker'in 1 Nisan reklamı: Hesaplaşma zamanı. (2017, April 1). *Sputnik Turkiye*. https://anlatilaninotesi.com.tr/20170401/ulkerin-1-nisan-reklami-tartisma-yaratti-1027894369.html

Ural, H. (2023). Affective intensities of polarization: The making of the Islamist/secularist divide through articulations of news media in Turkey. *Critical Discourse Studies*, *20*(6), 700–716. https://doi.org/10.1080/17405904.2022.2087703

VonDoepp, P., & Young, D. J. (2013). Assaults on the fourth estate: Explaining media harassment in Africa. *The Journal of Politics*, *75*(1), 36–51. https://doi.org/10.1017/S0022381612000850

Yanardağoğlu, E. (2021). *Transformation of the media system in Turkey*. Palgrave Macmillan.

Yanatma, S. (2021). Advertising and media capture in Turkey: How does the state emerge as the largest advertiser with the rise of competitive authoritarianism? *The International Journal of Press/Politics*, *26*(4), 797–821. https://doi.org/10.1177/19401612211018610

Yeşil, B. (2014). Press censorship in Turkey: Networks of state power, commercial pressures, and self-censorship. *Communication, Culture & Critique, 7*(2), 154–173. https://doi.org/10.1111/cccr.12049

Yeşil, B. (2016). *Media in new Turkey: The origins of an authoritarian neoliberal state*. University of Illinois Press.

Yeşil, B. (2018). Authoritarian turn or continuity? Governance of media through capture and discipline in the AKP era. *South European Society and Politics*, *23*(2), 239–257. https://doi.org/10.1080/13608746.2018.1487137

Yıldırım, K., Baruh, L., & Çarkoğlu, A. (2021). Dynamics of campaign reporting and press-party parallelism: Rise of competitive authoritarianism and the media system in Turkey. *Political Communication, 38*(3), 326–349. https://doi.org/10.1080/10584609.2020.1765913

Yilmaz, I., & Erturk, O. (2023). *Populism, authoritarianism and necropolitics: Instrumentalization of martyrdom narratives in AKP's Turkey*. Springer Nature.

About the Authors

Murat Akser (PhD) is a senior lecturer in the School of Communication and Media, Ulster University. He received his MA in cinema and media studies and PhD in communication and culture from York University, Canada. Murat's research focuses on the political economy of media, comparative media systems, media capture, alternative media journalism, and disinformation. His most recent book is titled *Alternative Media in Contemporary Turkey: Sustainability, Activism, and Resistance* (Rowman and Littlefield).

Banu Baybars is a professor of public relations at the faculty of communication at Kadir Has University, Turkey. She received her PhD from the University of Tennessee, USA, in 2002. Her research interests include the political economy of media and terrorism. Her research has appeared in numerous journals, including the *Middle East Journal of Culture and Communication*. She is also the author of *Freedom's Razored Edge* (2010) and has edited several volumes such as *New Media Politics* (2015), *Discourses and Practices of Othering* (2022), among others.

South African Media and Politics: Is the Three Models Approach Still Valid After Two Decades?

Bernadine Jones and **Adrian Hadland**

Department of Communications, Media, and Culture, University of Stirling, UK

Correspondence: Bernadine Jones (b.l.jones@stir.ac.uk)

Abstract

When Hallin and Mancini (2004) produced their watershed three models theory, South Africa was a new democracy barely a decade old. Even then, along with other countries of the Global South, the experience of a young democracy posed certain critical challenges to Hallin and Mancini's understanding of the way that media and politics interrelate. Two decades later, South Africa has continued to change. There has been increased diversity in media ownership, rapid growth in community and social media, digital disruption, and significant challenges to media freedom. How does the three models theory stack up now? This article reviews scholarly critiques of Hallin and Mancini's model, including their follow-up work, *Comparing Media Systems Beyond the Western World* (2012), and assesses to what extent the three models is still a valid approach to understanding the connection between media and politics in the Global South. The article concludes by evaluating Hadland's (2012) Africanisation of the model in light of the complex postcolonial trajectories of South Africa, suggesting that this, along with Hallin et al.'s (2021) expanded hybridisation model, still offers a better set of variables with which to understand how the media and political systems intertwine in the postcolony.

Keywords

comparative media systems; democracy; Global South; South Africa; three models

1. Introduction

Hallin and Mancini's (2004) thesis, the three models of media and politics, is a watershed moment for media theory. Their model highlights how media systems are shaped by broader social, economic, and political factors and how this impacts the democratic processes of a society. Yet it was their follow-up 2012 work,

Comparing Media Systems Beyond the Western World, that showed how these three models could (or could not) be transposed to non-Western societies. Hadland (2012) responded that there is a need to "Africanise" the model, observing the challenges facing media systems in South Africa specifically. While Hadland gave a framework for this postcolonial African model (including the preponderance of a dominant single party, the growing gulf between rural and urban, and serious obstacles to democratisation), much has changed in the country and globally since this response was published.

This article assesses to what extent the three models and Hadland's Africanised model are still valid approaches to understanding the connection between media and politics in the Global South. It does so by considering the dimensions of the original model and Hadland's response but adds new data and context by evaluating the rapid changes in South Africa's media/politics system over the last decade. This enables a more rigorous appraisal of the significance of these changes and their subsequent impact on the validity of the Hallin and Mancini thesis. The article suggests that a hybrid model of media systems is more appropriate and applicable to the postcolonial location. It argues that Hallin and Mancini's model is, as Hadland (2012) and others have argued (Fourie, 2011; Rodny-Gumede, 2015a, 2015b, 2020), a useful set of variables but cannot and should not be the Procrustean Bed of media system analysis.

From the perspective of Hallin and Mancini's model, Hadland (2012) argues that South Africa's media landscape reflects a mix of the democratic corporatist and polarised pluralist models. The country's media ownership is concentrated in the hands of a few powerful players and there are continuing concerns about the media's independence and impartiality. At the same time, however, there is a strong tradition of investigative journalism and a relatively high degree of media freedom. And so, despite South Africa appearing to fit somewhat into these models, Hadland argues that an "Africanised" model of media and politics should prioritise issues such as media ownership, media freedom, and the role of traditional media in a digital age as these often come with unique challenges in the African context. South Africa, he suggests, has strong features of political parallelism in that there is a direct link between journalists and politicians or businesspeople. Hadland cites the removal of South Africa's second democratically elected President Thabo Mbeki from office in 2008 as a key identifier of the centralisation of power in the country. Professionalism in media is generally low too, while there is a fourth estate tension and journalistic autonomy that is increasingly at stake due to heavy-handed state intervention with a dominant party that often overwhelms media agendas, narratives, and debates.

Further "Africanisation" of the three models (Hadland, 2012) occurs because of South Africa's postcolonial context. A dominant single-party state, state-sponsored initiatives to deracialise civil society, exacerbation of interethnic tensions, attempts to detribalise local government, the economic development within the context of unequal international relations, the rise of clientelism, the rural and urban divide, and serious obstacles to democratisation are all features of the uniquely (South) African media and political systems.

The Hallin and Mancini model does not cope very well with rapid, dramatic systemic change or divergent models of democracy, and expects too much of homogenisation, particularly in emerging democracies (Hadland, 2012). It is this focus on Western/Global North media systems and societies that disrupts the three models, and this is Hadland's ultimate aim—suggesting a broader focus on the tensions inherent in non-Western societies between media systems and politics. This article aims to update both Hallin and Mancini's and Hadland's initial responses by accounting for a further decade of media systems change and challenges in the country and globally.

2. Literature

To populate their original thesis, Hallin and Mancini (2004) decided to focus on gathering data from 18 nations, all drawn from Western Europe or North America and all with similar histories as advanced capitalist democracies. This, they explained in their follow-up volume (Hallin & Mancini, 2012), was deliberately done to seek empirical commonalities within a relatively homogenous group and to avoid the temptation encountered by previous studies to universalise findings from narrow data "producing superficial analyses" (Hallin & Mancini, 2012, p. 1). The authors were quick to acknowledge, however, that in selecting a cohort of Western systems, "systems we simply knew best" (Hallin & Mancini, 2012, p. 1), this would prompt scholars from around the globe to ask: "How does my country fit into your model?" (Hallin & Mancini, 2012, p. 1). Certainly, those scholars who did grapple with this question began to identify aspects of the model that didn't correlate with their own experience of their national media systems. Hallin and Mancini's (2012) follow-up volume sought to expand the cohort of countries and the spectrum of critique by inviting a range of global scholars to consider the validity of the variables used in the original study and to reflect on the scope of its assumptions and methodology.

The result was a reconsideration of many of the components of Hallin and Mancini's three models thesis. Among these was a "reconceptualisation" of variables used in the models such as political parallelism, which the authors agreed meant something different in Chinese or African systems compared to European party environments. Relevant to this article, Hallin and Mancini (2012, p. 294) conceded: "As Hadland shows, South Africa would be an example of a one party dominant system...such a case clearly requires a different conceptualisation of the relation of media and politics than anything we develop in comparing media systems." Further challenges were mounted within the 2012 volume to the conceptual and theoretical foundations of the Hallin and Mancini thesis. The three ideal types proposed in the original work, the polarised pluralist, liberal, and democratic corporatist models, were shown to be demonstrably more porous and hybrid beyond the Western world. The inevitable convergence of media systems toward a commercialised, politically unaligned sector, argued by Hallin and Mancini in the original work, was subsequently contested by scholars from the Global South. Media partisanship, an important media system characteristic in the original model, looked to have a different value in a political system where there was only one dominant party. Journalistic professionalism was a further concept that had a diverse range of meanings within different national contexts, from China to Brazil.

Hallin and Mancini embraced many of these revisions. In spite of the contestations and reconceptualisations, most scholars agree on the profound importance and utility of the Hallin and Mancini paradigm and the validity of its empirical, rather than normative, approach to media systems analysis. Hallin and Mancini themselves warned against any expectation that their work would result in a single conceptual framework but rather the nurturing of a "broad and deep tradition of comparative analysis" (Hallin & Mancini, 2012, p. 304) that would inevitably embrace an increasingly global and diverse frame of reference. This is an aim to which this article wholeheartedly subscribes.

South Africa as a case study poses a number of critical questions which initially emerged with Hadland's (2012) response but have since been expanded and diversified by other scholars in the light of more recent historical, technological, and theoretical developments. In his original response, for instance, Hadland (2012) argues that the model should consider a more participatory approach to journalism and should emphasise

the importance of community-based media initiatives. In this context, some positive changes have taken place since 2012. The increase in media diversity and ownership by Black South Africans started in the late 1990s with New Africa Investment Limited, or Nail, and Johnnic Holdings bringing some of the biggest newspaper titles under Black ownership, while Sekunjalo, a Black-owned private equity firm, took over the Independent Group in 2013. This process has not been without its problems, however, as transformation efforts have had mixed success (Wasserman, 2020). Additionally, the growth of community media and the digital disruption have helped to promote greater participation and representation. More scholars have also revisited the Africanisation debate from the perspective of broadening media systems in South Africa.

It would be remiss to start revisiting the three models and Africanisation theses without first mentioning Hallin et al.'s (2021) article about hybridity in journalism studies. While there have been multiple responses to the three models, this article outlines how journalism studies have evolved over the decade since the original concept was published. Hybridity, the authors suggest, has always existed and was, they argue, at the heart of the three models concept but not stated so overtly. Indeed, the polarised pluralist model, with which Hadland (2012) states South Africa most aligns, is characterised by blurred boundaries between politics and media and a lack of consensus on professional norms. Even the democratic corporatist model, which Hadland suggests is where South Africa straddles alongside political parallelism, is defined by the coexistence of commercial and party press, a blurring of the political and the commercial as it were. This "hybridity," the networked characteristics built on the legacy professionalism of modern media, stems from postcolonial studies where the interplay of global and local cultures creates a mixture of a third type. "Central to the hybridisation of culture perspective is the idea that people actively appropriate global cultural forms and combine them with their own, pre-existing forms to create new ones" (Hallin et al., 2021, p. 224). The "blurring" of media systems and political boundaries appears to be the updated feature of the three models concept. Although Hallin et al. (2021) argue hybridity has always been at the heart of their thesis, Hadland and others have failed to see that in such clarity.

Indeed, Rodny-Gumede (2020) has dedicated much time to analysing how South Africa's media systems blur with political structures, particularly in the last decade, and determinedly states that comparative media systems have failed to address the postcolonial context in any meaningful manner. She acknowledges that South Africa is commonly analysed purely on its own terms without comparison, but also that Hallin and Mancini's thesis is less of a model and more of a set of variables to consider during the analysis of such systems. Rodny-Gumede also points out that the changes and challenges of South Africa's modern media system over the last decade serve to significantly update Hadland's Africanised model and thus by extension the original three models thesis. Concepts of professionalism and the move against normative liberal journalistic values (Rodny-Gumede, 2015b) in South Africa form the ideal of "Ubuntu journalism" (Rodny-Gumede, 2015a). "Ubuntu" is a sub-Saharan public service ethos where communal values and harmonious relations are at its heart. Meanwhile, Wasserman (2020) outlines the extensive changes to South Africa's media landscape over the past two decades, from the inception of the Media Development and Diversity Agency in 2003 to the media ethics and regulation enquiry of the South African National Editors Forum in 2019. Wasserman (2020) agrees that the normative frameworks and regulatory processes of South Africa's media are still contested and debated, while tensions between the media, government, and corporate interests continue to significantly affect journalistic practice.

Along with the rest of the globalised world, South Africa has undergone immense technological and societal changes since Hallin and Mancini's (2004) thesis and Hadland's (2012) response. The last decade has seen

the rise of social media and its role in democracy, the entrenching problems of media freedom and the (as yet unsigned) Protection of State Information Bill, and a senior executive manager of the South African Broadcasting Corporation (SABC) essentially censoring news during a period of heavy protest action in the country. One of the most horrifying attacks on the media structure in South Africa occurred between the years of 2014 and 2017 when UK-based PR company Bell Pottinger ran multiple campaigns to discredit journalists and destabilise the political system of the country (Al Jazeera Investigative Unit, 2023; Jones, 2021; Wasserman, 2020). They did so at the behest of the Guptas, a rich Indian family with strong and corrupt ties to the President at the time Jacob Zuma, with their campaigns designed to deflect attention and undermine investigative journalism in the country.

The destabilising of the South African mainstream media—initially through corporate acquisition and then by political subordination—was accompanied by a simultaneous, rapid accumulation of influence in all other spheres of the economy and government. This wave of acquisitive cronyism underpinned by racial tropes became known as "state capture" which, in turn, led to a catastrophic setback in race relations in South Africa. The capture of South Africa's state and some of its media was so complete that, in under three years, the family had wreaked enough havoc in the social coherence built up after the advent of democracy in 1994 to set it back by decades (Jones, 2021, p. 73; Wasserman, 2020). The event reads like a parable, but it is, unbelievably and painfully, true. In the midst of this chaos, South Africa has seen two (and a half) presidents, countless political scandals, one pandemic, and digital disruption so severe it received its own title of the "Fourth Industrial Revolution" (Schwab, 2016). These changes have affected the tension between media and politics in ways that highlight the faults in Hallin and Mancini's (2004, 2012; see also Hallin et al., 2021) models and call into question the applicability of the models entirely in such a context. Given the literature on South African events over the last decade, the following sections discuss four areas of Hallin and Mancini's original thesis and evaluate the applicability of the three models and updated hybridity response as well as Hadland's Africanisation framework.

3. The Structure of the Media Markets

The original three types outlined in Hallin and Mancini's original work, the polarised pluralist, liberal, and democratic corporatist models, are arguably more porous and hybrid in countries once called the Global South or the non-West. While Hallin et al. (2021) argue that media convergence is commercial and politically unaligned, this is simply not the case in countries beyond the Western world. Media and politics are invariably linked and intertwined, to varying degrees, in post-colonial countries such as South Africa. One such glaring case exists in the national broadcaster of South Africa, the SABC. In 2011, Hlaudi Motsoeneng took over operations at the SABC, the country's biggest supplier of news, and the already beleaguered media provider nosedived. Then, in 2016, Motsoeneng, in a catastrophic misunderstanding of media effects theory, banned images of protest action on the news when property was damaged (that is, almost all of the time). This act effectively censored news about protests in South Africa during a time when protests were widespread against the ruling African National Congress (ANC) government and, in particular, the then-President Jacob Zuma. Motsoeneng's censorship of South Africa's largest broadcast news provider prevented many from seeing how widespread these protests had actually become and at times how desperate and violent. SABC's spokesperson Kaizer Kgangyago attempted to explain: "We are not going to show footage of people who are destroying property but we are still going to explain everything and tell people what has happened, and if that is censorship then I don't understand" (Heiberg & Motsoeneng, 2016).

Despite the Independent Communications Authority of South Africa ordering a reversal of the policy, the SABC continued to promote "70% positive news" (Heiberg & Motsoeneng, 2016) on its bulletins and removing talk shows and news items that discussed the Guptas, a rich Indian business family with close ties to former President Zuma. The "Guptagate" scandal ran long and deep in the history of modern South Africa, and the investigations from the subsequent Zondo Inquiry ran into the thousands of pages. Deputy Chief Justice of South Africa Raymond Zondo, who chaired the Commission, found multiple government ministers, senior ANC members, former and current heads of state, media and parastatal enterprise owners and directors, and law enforcement had engaged in corrupt acts in support of the Gupta family (Jones, 2021, pp. 73–77, 101).

These scandals are by no means the only corruption events to run through South Africa's modern media history, but they are probably the most important. Motsoeneng's placement as chief operating officer of the SABC and the Guptas' capture of the state and media effectively tied independent journalism in the country to a stake. The deteriorating relationship between government and the media markets is never more obvious than during elections, where the national broadcaster often engages in acrobatics to avoid government scandals and corruption stories while attempting to report in a Westernised, liberal, "fourth-estate" manner. It is here where Fourie (2011) and Rodny-Gumede (2015a, 2015b, 2020) argue that South Africa's journalism system does not fit neatly into the liberal, Western conception of news.

Rodny-Gumede (2020, p. 618) also argues that the analysis of South African media markets needs to be seen in light of growing social media infiltration, primarily because these platforms provide easier access for a broader layer of population and impact the social activism of politics. Despite enhanced democratisation of the media thanks to social media (Twitter or X, Facebook, and WhatsApp being the most used platforms for much of the preceding decade in South Africa), there are limits to this role thanks to the country's postcolonial and African location. Twitter, in particular, has had a levelling effect on modern politics (Ahmed et al., 2017; Yang & Kim, 2017) whereby social media can help overcome resource inequality in campaigning and mobilisation, but the data with which to use the app is expensive in all but the most urban areas of South Africa. Smartphones and the related internet costs are out of reach for many rural and impoverished South Africans and, until recently, bandwidth and data were the most expensive in the world (Newman et al., 2020, p. 106). These high costs prohibit a plurality of streaming news sites from reaching the rural enclaves (see Jones, 2021, pp. 94–99; Wasserman, 2020), and most South Africans rely on the SABC in both radio and television or print news, a fast dying out information medium across the world. Digital diversification of the media landscape is happening, but some South Africans are simply left behind as others steam ahead with the Fourth Industrial Revolution.

Despite the diversification of the news landscape in recent years (from print news across the language spectrum to television news networks globally sourced and locally presented), South African media systems have slipped steadily further into the polarised pluralist model and away from the liberal model, entrenching the trends Hadland (2012, p. 100) noted. The closeness of political actors to the media now blurs the line between the Westernised ideal of journalism and the so-called "developmental" journalism style so prevalent in postcolonial nations. The blurring of these lines is characteristic of Hallin et al.'s (2021) updated "hybridity" response, yet also corroborates Rodny-Gumede's (2020) argument that post-colonial news and journalism practice does not fit exactly into these Western models.

4. Political Parallelism

In 2012, Hadland noticed that the closeness of political actors to the media systems in South Africa showed signs of slipping further from the liberal model and into the polarised pluralism realm. Civic society structures were diminishing, including media literacy and unequal access to media, while the media that was available exhibited clientelism. Despite this and the apparent slippage into political parallelism, some areas of South Africa's journalistic profession are still fiercely independent with a strong civic activist slant. These overlapping issues show that South Africa was, in Hadland's view, a poor example of the Hallin and Mancini media markets model in that the country has elements of everything.

Characterising the state and support for the state is important in understanding the media markets, because of South Africa's unique history of apartheid. Often, support for state intervention in media markets is legitimately built through a combination of development journalism and the liberation history of the ruling party, the ANC. The ruling party still dominates media coverage (Jones, 2021, p. 30) and has a stronger role in the beleaguered public broadcaster than in other, more independent media. During Zuma's rule between 2007 and 2019, political parallelism was at its height. The intervention of Zuma's cabinet in the SABC is widely recognised (Wasserman, 2020), turning the once-reformed SABC into an ugly monster (Malala, 2015), reminiscent of the apartheid-era mouthpiece of the government. These recent issues of state intervention show a clearer link to Hallin and Mancini's political parallelism than in Hadland's original thesis, in that additional constituents are now visible: an emphasis on commentary rather than neutral news (Jones, 2021, p. 7), the activist role of newspapers in mobilising for politics (Arant et al., 2023), party-politicised public broadcaster (Jones, 2021, pp. 91–95; Wasserman, 2020), and strong ties between political figures and journalists (Rodny-Gumede, 2015a). Clientelism amongst the broad spectrum of government is heightened, seeping into media markets too (Wasserman, 2020). South Africa now seems to be a stronger fit for political parallelism than in Hadland's article a decade ago. While this intervention of the state is visible primarily in the public broadcaster, it is the SABC that controls most of the airwaves for the majority of the South African populous.

However, as Hadland (2010, p. 90) notes, the "dynamics of power is an under-represented concept within the three models paradigm" and this remains true. In emerging democracies and transitional societies, the structures between media and politics tend to interlock and overlap because of the tension between the structure itself and the agency (Roudakova, 2012; Voltmer, 2011). It therefore stands to reason that South Africa is a difficult at best fit to the original models. Hallin et al.'s (2021) updated response also fails to take into account the dynamics of power between state and media to the extent that the "hybridity" model focuses predominantly on blurring cultural forms and norms, rather than tensions between cultural and political norms stemming from post-colonial histories.

5. Professionalism

The indicators of professional journalism, in Hallin and Mancini's original model, include autonomy, distinct professional norms, and public service orientation. Hadland makes the point that public service orientation has different meanings in South Africa, in that state-funded initiatives to provide information and content are frequent and widespread, especially on the public broadcaster. These professional norms have only increased over time: For example, during the early days of the pandemic, the satellite subscription service

DSTV provided free-to-air access to international and local television news channels ("SABC: Informing, educating, and entertaining," 2020). The SABC TV channels provided educational content during the lockdowns in 2020 and 2021, such as the *Covid-19 Learner Support*, designed to prevent disruptions to students' education. While the public service orientation had come under criticism about media freedom during the pandemic (the Public Media Alliance highlighted concerns about the battle with disinformation and the public broadcaster), the attempt to enhance and expand the public services shows that professionalism is still strong in some areas of the country.

The second meaning of public service broadcasting, Hadland outlines, is developmental media generating responsible coverage of emerging democratic states. Here, Rodny-Gumede (2020) argues that transitional societies often undergo a "re-politicisation" of media. In South Africa, the Media Appeals Tribunal—which remains unsigned at the time of writing—includes a Protection of State Information Bill, otherwise known as the Secrecy Bill. South Africa's independent media and the social media revolution have so far resisted attempts at state coercion and have kept up the pressure by reporting on corruption and limits to media freedom, but this activistic trend is under constant tension in the country. The tension between processes of a global liberal ethos compared to the legacies of autocracy in postcolonial societies (Rodny-Gumede, 2020, p. 620) highlights how South African journalists conceptualise their own role in democratisation. Constant pressures of the public versus national interest (threatened by the Secrecy Bill), development ideals, and nation-building on the side of government versus a more fourth estate conception of journalism, pull at the professional efforts in South African newsrooms. Indeed, there is constant tension and declining professional norms in newsrooms globally, with Curran's (2019) triple crises of journalism a reminder that global pressures can and do affect non-Western journalistic practice, albeit with slightly different foci. Despite Hallin and Mancini's neatly delineated models, Hadland and Rodny-Gumede argue that South Africa's professional journalism systems do not fit exactly into any model or framework. Rodny-Gumede (2020, p. 621) raises the question: The role of journalism in South Africa and elsewhere need not be polarised as being either a watchdog of power *or* serving the government's agenda. It could be all things. Fourie (2011) and Rodny-Gumede (2015a, p. 2020) suggest that South African journalists, while ascribing to the liberal model of objectivity and autonomy, acting as overseers, do not enforce nor desire these normative ideals. Hence, Hallin and Mancini's model is, as Hadland originally argues, a useful set of variables but cannot and should not be the Procrustean bed of media system analysis.

The recent "hybridity" model update accounts for some of these blurred lines but does not consider the postcolonial trappings of South African professional journalistic practice aside from the need to move away from what is or is not journalism, media, or politics. Hermida's (2013) "ambient journalism" accounts for the blurring of lines between actors, practices, and genres, while Mellado et al. (2017) show that journalism professionalism does not have to be an either/or equation and can in fact exist within multi-layered hybrid cultures. The added level of hybridity should account for the postcolonial tension between media and state, particularly where the state has a complicated history of capture by business, disruption, and antagonism of the freedom of the press, and increasing blurred lines between state, political, and journalistic actors.

6. Role of the State

There is well-documented hostility of the ruling ANC government towards the media in South Africa. From the second President Thabo Mbeki, through the disruptive and damaging Jacob Zuma years, to the current

President Cyril Ramaphosa, the state's policy towards the free media of South Africa has been to snub, at best and, at worst, to attack. The ANC has had a rough relationship with the media that increasingly attempts to hold the party to account for its actions since taking power in 1994. Yet, the party fails to see this as a liberal fourth-estate action of global journalism and more as a personal, vindictive, and often racist attack on them as self-designed liberators of South Africa. This antagonism stems from a tension between the liberal normative understanding of journalism, the freedom of the press and its role in democratisation, and the African values of a development media with an acquisitive state (Hadland, 2010).

Over the last decade, the ANC government has had various interventions in the media that further blur the line between state actors and media systems. These interventions have been legislative, such as the Media Appeals Tribunal in 2008 (Wasserman, 2020); legal, such as the libel cases between Jacob Zuma and the political cartoonist Zapiro (Jones, 2021, p. 64); as well as limiting access to statistics and information from the government, as in the Arms Deal (Jones, 2021, p. 71) and the HIV/AIDS debate under Mbeki (Jones, 2021, p. 59). Liberation movements such as the ANC have a poor reputation once in government as they tend to, as Southall (2013, p. 332) says, grow old disgracefully. Once in power, they turn their new democracies into one-party states where the distinction between government and state is blurred. Rodny-Gumede (2020, p. 617) makes important points here: The new elite in South Africa have clear links and close ties to politics, and this is different from the democratic corporatist model from Eastern Europe. These elites are empowered in not dissimilar ways to the old National Party under apartheid, where white elite businessmen forged close ties with the Afrikaner capital (see Jones, 2021, p. 84). Hadland (2012) also notes that South Africa has unorthodox modes of intervention, where both silent and overt censorship are used routinely through corporal punishment, the use of state-owned media to discredit opposing voices, and by-passing laws making insult and libel punishable in courts. There is a disconnect between South Africa's constitutional rights and practice and this has been a growing divide over the last decade.

Hallin and Mancini (2012) do acknowledge that the shaping of postcolonial markets is determined through the use of access—both in terms of economic, literacy, and digital inequality but also in the hybridisation of local and global influences, such as China's influence across Africa (Rodny-Gumede, 2020). The problem is that South Africa's unique and complicated history of apartheid, liberation, state capture, and geography means that the country does not fit neatly or at all into these media system structures. The hybridity that Hallin et al. (2021) speak of is often limited to the kinds of media targeted to distinct audiences, legacy and digital media, and the unbundling of media outlets, while in South Africa the fragmented media markets are tied to political interventions. Hybridisation in South Africa affects the local and global influences, "pertinently shown through the presence of Chinese media on the continent and how this is changing ownership patterns and media practise" (Rodny-Gumede, 2020, p. 618). This raises the question of media freedom, the role of the state, and the democratisation role of the media.

7. Conclusion: The Africanisation of the Model

Hadland (2012) set out the strong characteristics of the three models' failure in the application to a postcolonial, post-apartheid country such as South Africa. The original models do not cope very well with rapid, dramatic systemic change or divergent models of democracy. These models tend to expect too much of homogeneous markets, even in new democracies or the postcolony. Hadland also notes that the original models miss how commercialisation can actually enhance the process of political parallelism and state

intervention, rather than diminish them. Hence, Hadland sets out an "Africanisation" of the model, whereby there is a preponderance of a dominant single party, state-sponsored initiatives to deracialise civil society, the rise of clientelism, and the growing gulf between the rural and urban societies. These are recommended additions to Hallin and Mancini's thesis and they still ring true. The last decade has shown a further slip into polarised pluralism. New elites created in the post-apartheid era have close and clear ties to politics and the political influence of the nation's media has strengthened to the point where soft and outright censorship now controls much of the state's public service broadcasting ability.

Although Hadland noted that South Africa had more in common with the liberal model than the polarised pluralist model, it now seems that none of these models is adequate enough to describe and analyse the media and political systems in the country. The updated hybridisation model (Hallin et al., 2021) helps to understand the media markets in terms of fragmentation but does not go far enough to explore and evaluate the influence of global and local politics in the media markets, particularly in the postcolony. Additional characteristics that affect the postcolony, particularly in the Global South and especially in Africa, should better outline ethics of media practice (Rodny-Gumede, 2015a), the continued political interventions on journalistic integrity and professionalism, and the unique specifics of digital, language, and geographical access. Blanket models that are developed for and by Western theorists have a difficult application to Global South systems, even if some aspects fit with a squeeze. The Hallin and Mancini (2004, 2012; see also Hallin et al., 2021) models are important and illuminating, but none fit exactly the media systems of a country such as South Africa. The hybrid model is more appropriate and applicable, but even here the application is mixed. These models are a useful set of variables with which to understand how the media and political systems intertwine, but trying to ruthlessly force this system to fit into the blanket models would be best left for Procrustes, not communication theory. In this article, we have argued that it may be time to create a new, non-Western-centric typology of media markets that considers the intricate histories of postcolonialism, struggles of democracy, and a Fourth Industrial Revolution that steamrolls over some and yet simply leaves others behind.

Conflict of Interests

The authors declare no conflict of interests.

References

Ahmed, S., Cho, J., & Jaidka, K. (2017). Leveling the playing field: The use of Twitter by politicians during the 2014 Indian general election campaign. *Telematics and Informatics*, *34*, 1377–1386.

Al Jazeera Investigative Unit. (2023, April 14). Gold mafia helped Gupta brothers in South Africa state capture. *Al Jazeera*. https://www.aljazeera.com/news/2023/4/14/gold-mafia-helped-gupta-brothers-in-south-africa-state-capture

Arant, R., Hanke, K., Mittelstädt, A., Pennington, R., Umel, A., & Odag, Ö. (2023). The role of media use in political mobilization: A comparison of free and restrictive countries. *International Journal of Communication*, *17*, 1530–1550.

Curran, J. (2019). The triple crises of journalism. *Journalism*, *20*(1), 190–193.

Fourie, P. (2011). Normative media theory in a changed media landscape and globalized society. In N. Hyde-Clarke (Ed.), *Communication and media ethics in South Africa* (pp. 25–45). Juta.

Hadland, A. (2010). Perspective from the South: Triggers and signs of change. In B. Dobek-Ostrowska, M. Glowacki, K. Jakubowicz, & M. Sükösd (Eds.), *Comparative media systems, European and global perspectives* (pp. 77–96). CEU Press.

Hadland, A. (2012). Africanizing three models of media and politics: The South African experience. In D. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 96–118). Cambridge University Press.

Hallin, D., & Mancini, P. (2004). *Comparing media systems: Three models of media and politics*. Cambridge University Press.

Hallin, D., & Mancini, P. (2012). *Comparing media systems beyond the Western world*. Cambridge University Press.

Hallin, D., Mellado, C., & Mancini, P. (2021). The concept of hybridity in journalism studies. *The International Journal of Press/Politics*, *28*(1), 219–237.

Heiberg, T., & Motsoeneng, T. (2016, July 20). South African broadcaster in censorship storm before local vote. *Reuters*. https://www.reuters.com/article/safrica-politics-sabc-idINKCN1000E9

Hermida, A. (2013). #Journalism: Reconfiguring journalism research about Twitter, one tweet at a time. *Digital Journalism*, *1*(3), 295–313.

Jones, B. (2021). *Desperately seeking depth: Elections and TV news in South Africa*. Routledge.

Malala, J. (2015). *We have now begun our descent: How to stop South Africa losing its way*. Jonathan Ball.

Mellado, C., Hellmueller, L., Márquez-Ramírez, M., Humanes, M. L., Sparks, C., Stępińska, A., & Wang, H. (2017). The hybridization of journalistic cultures: A comparative study of journalistic role performance. *Journal of Communication*, *67*(6), 944–967.

Newman, N., Fletcher, R., Schulz, A., Andı, S., & Kleis Nielsen, R. (2020). *Reuters Institute digital news report 2020*. Reuters Institute for the Study of Journalism. https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf

Rodny-Gumede, Y. (2015a). An assessment of the public interest and ideas of the public in South Africa and the adoption of Ubuntu journalism. *Journal of Mass Media Ethics*, *30*(2), 109–124.

Rodny-Gumede, Y. (2015b). Re-conceptualizing the analysis of media development and trajectories hereof in post-colonial societies. *Global Media and Communication*, *11*(2), 131–146.

Rodny-Gumede, Y. (2020). Expanding comparative media systems analysis from transitional to postcolonial societies. *International Communication Gazette*, *82*(7), 611–627.

Roudakova, N. (2012). Comparing processes: Media, "transitions," and historical change. In D. Hallin & P. Mancini (Eds.), *Comparing media systems before the Western World* (pp. 246–277). Cambridge University Press.

SABC: Informing, educating, and entertaining the South African public at a time of crisis. (2020, April 27). *Public Media Alliance*. https://www.publicmediaalliance.org/sabc-informing-educating-and-entertaining-the-south-african-public-at-a-time-of-crisis

Schwab, K. (2016, January 14). The Fourth Industrial Revolution: What it means, how to respond. *World Economic Forum*. https://www.weforum.org/agenda/2016/01/the-fourth-industrial-revolution-what-it-means-and-how-to-respond

Southall, R. (2013). *Liberation movements in power: Party and state in South Africa*. James Currey.

Voltmer, K. (2011). How far can media systems travel?: Applying Hallin and Mancini's comparative framework outside the Western world. In D. Hallin & P. Mancini (Eds.), *Comparing media systems beyond the Western world* (pp. 224–245). Cambridge University Press.

Wasserman, H. (2020). The state of South African media: A space to contest democracy. *Publizistik*, *65*, 451–465.

Yang, J., & Kim, Y. M. (2017). Equalization or normalization? Voter–candidate engagement on Twitter in the 2010 U.S. midterm elections. *Journal of Information Technology & Politics*, *14*(3), 232–247.

About the Authors

Bernadine Jones is a lecturer in journalism at the University of Stirling. As co-founder of the Visual Rhetoric/Media Semiotics research group, her interests lie in social semiotics, visual analysis, multimodal discourse methodology, and television news. Her research converges at the intersection of media, politics, and representation. She has written on the visual and social semiotics of television news election coverage, governmental Covid-19 visual communication, and the profession of journalism in Africa.

Adrian Hadland is a professor of journalism and media studies at the University of Stirling, where he is the undergraduate programme director for journalism, and a visiting professor at Nanjing Normal University, China. Hadland worked as a political journalist in South Africa for 15 years and then in policy research before switching to an academic career. He has published 20 books and a wide range of scholarly articles.

Media and Communication is an international, peer-reviewed open access journal dedicated to a wide variety of basic and applied research in communication and its related fields. It aims at providing a research forum on the social and cultural relevance of media and communication processes.

The journal is concerned with the social development and contemporary transformation of media and communication and critically reflects on their interdependence with global, individual, media, digital, economic and visual processes of change and innovation.

cogitatio