

## INDIRECT AND DIRECT SUBSIDIES FOR MEDIA: THE EUROPEAN EXPERIENCE

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### 1. Executive summary

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This report presents four models of direct media subsidies in Europe: from Serbia, Croatia, Sweden and the European Union as well as an overview of reduced VAT rates for newspapers, digital publications and periodicals in EU countries and Serbia. In recent years, the value of direct state aid for media has been questioned, while indirect subsidies, such as tax exemptions, have been the model preferred by governments and welcomed by media owners. This is especially the case with reduced VAT rates, which have been introduced in all EU Member States and beyond.

Two cases from southeast Europe – Serbia and Croatia – present different types of direct subsidising of content that is in the public interest. In the Serbian case, national, regional and local-level entities support (or co-finance) media content production that serves the interests of the general public as well as that of underrepresented groups and upholds professional journalistic standards. While important changes related to transparency were introduced in 2015, there is still room for improvement, most importantly in order to avoid political parallelism.

In Croatia, the Electronic Media Diversity and Pluralism Incentive Fund, which was established in 2005, serves as an important tool for the creation of high-quality content, primarily on the local level. Research shows that it has been essential to the survival of local media as well as to the development of non-profit journalism. These funds, which account for 3% of total revenues from the annual broadcast licence fee, are mostly allocated to commercial radio and television on the local level, which has been a bone of contention for non-profit media actors, who benefit to a far lesser degree.

Swedish media subsidies cover areas such as innovation and development in media operations, distribution, newsgathering and local journalism as well as support to mitigate the impact of COVID-19. They have been constantly evolving since they were introduced in the early 1970s. While initially targeting print media, they have expanded over time to embrace technology-neutral outlets and are applicable to both print and digital media. A distinct feature of the Swedish media ecosystem is that, in contrast to many other European countries, the subsidies support general news reporting and commentary rather than specific public interest content with Swedish media business interests playing an important role.

The European Union allocates support for media with the aim of addressing structural challenges in the sector. External expert teams, engaged by the EACEA (the European Commission's Education and Culture Executive Agency) evaluate projects in the areas of media freedom and pluralism, collaboration and evaluation, as well as citizen engagement and the public sphere. The current financial framework covers the period from 2021 to 2027 and represents a shift in media policy at the EU level.

### 2. Introduction

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It is true to say that media markets have experienced pandemics of their own. Although it is most often linked to the rise of internet distribution channels, the transformation of the media sector arguably began with the slowdown in the economic growth of developed countries in the 1970s. However, when targeted digital marketing emerged<sup>1</sup>, it was clear that this was not a temporary crisis of media revenues, but a structural turning point. By this time, the sales figures of newspapers were already falling due to free online news content, but, on balance, the promise of the Internet as an instant distribution vessel with virtually no marginal costs was an appealing one. Efforts to compensate for lost income by cutting editorial positions led to smaller audiences accessing less content – especially given the Internet's abundance of free access – and smaller audiences meant fewer advertisers. To make matters worse, digital advertising drove prices down, and, in order

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<sup>1</sup> Google introduced the AdWords service in 2000.

to compensate for declining revenues, the next phase in the downward spiral of media and professional journalism began.

These dynamics have been well researched and documented. We find the accounts by McChesney (2013) and McChesney and Nichols (2010) the most compelling. Advertisers who asked media outlets to refrain from investigating their businesses may not have been journalism's greatest allies but, for better or for worse, advertising revenue has paid for some of the defining moments in the history of investigative journalism. Unfortunately, it would be naive to expect that such support will ever return. Instead of waiting for breaks in news reports, advertisements now follow us throughout our online journey and the businesses paying for them share little interest in funding journalism. Even if growing digital subscriptions and micropayments – combined with the benefits of digital distribution – may someday in the future make up for the loss of sales from the print era, the structural differences of digital ads mean that they are unlikely to fill existing gaps in media business models.

So, the question is this: can the support that was previously provided to professional journalism by advertising ever be replaced by state subsidies? And if so, how important are the methods and techniques for media subsidies? In other words, is way in which governments allocate subsidies as important as their size and scope?

Media organisations themselves have often portrayed state subsidies as contentious, if not overtly dangerous to the functioning of the market, to media autonomy and to freedom of speech itself. At the same time, state aid has been readily accepted – even by its detractors. For example, we will later see that recent media subsidies in Serbia are sometimes seen as a symptom of *political parallelism* (Hallin and Mancini 2004) and a vehicle for the *undue influence* of political power over journalism. This kind of setting tends to advocate in favour of *indirect* media subsidies, such as reduced VAT rates or other types of taxation. The “automatic” allocation of substantial state aid would seem to confute any dubious symbiosis between the political establishment and the media sector. If a newspaper meets some very basic technical criteria – for instance, being published daily – it receives the discounted VAT rate.

Although they clearly cater more to larger media outlets, indirect subsidies have been generally characterised as fair. Of course, newspapers in a dominant market position are also much more attractive to advertisers. Consequently, this triple privilege has led to larger publishers taking over smaller ones, thus endangering *media pluralism*. Conversely, *direct subsidies* – monetary grants or other payments made directly to an organisation – have often been aimed at supporting smaller media outlets, which otherwise risk being forced out of the market.

Given that they raise suspicions of unjustified political interference in media operations, such subsidies need to be carefully legitimised. This can be achieved through narratives highlighting the social role of their beneficiaries, or the need to compensate for the shortcomings of the media market, or both. Media scholars distinguish between “economic rationales” (saving jobs, surviving crises, alleviating financial burdens, boosting demand, innovation etc.) and “value-related rationales for media subsidies” (diversity, quality, the “watchdog” function, media literacy, fixing “news deserts” at the local level or non-profit media development) which are often intertwined (Trappel 2018). Another useful distinction in the ecology of media subsidies are (often direct) incentives for the production of a particular kind of “public interest” content – however loosely defined – as opposed to subsidies to support the work of newsrooms, regardless – at least to an extent – of what is produced.

In this report, two examples from southeast Europe, one from the Nordic countries and the EU model are presented. Southeast Europe is chosen not only because the authors are more familiar with the region but also because these countries betray the distinct characteristics of overcrowded media markets. By contrast, the Nordic markets are often regarded as (over)concentrated.

Our focus is on direct subsidies. This is motivated by the media viability crisis which has been intensified by the rise of the internet, digital technology and data markets but which has yet to be resolved either by business leaders or by effective media policies. In this context, we consider the experiences and methods of allocating selective direct media subsidies to be one viable way of funding journalism.

Commissioned for the National Media Viability and Investment Conference  
Sierra Leone, April 2022



### 3. Reduced VAT rates: the most common form of indirect media support

Since media owners often consider direct state aid to be a way of exerting political and financial influence over editorial freedoms and business choices, other policy measures have usually been met with a greater degree of enthusiasm. Prior to the challenges prompted by the Covid-19 pandemic, changes in the overall media economy related to the digital transformation have led to the launch of media policy initiatives aimed at addressing the decrease in advertising revenues in the print media industry (Nielsen and Linnebank 2011, Carlini and Bleier-Simon 2021).

One of most common remedies was reduced VAT rates for print newspapers and magazines – an approach that was later extended to digital media. In accordance with EU regulations, Member States can introduce up to two reduced VAT rates (EC 2022) and all EU countries, as well as neighbouring states such as Norway or Serbia, have readily implemented this measure. During the COVID-19 pandemic, VAT rates were often reduced further (Bleier-Simon and Nenadić 2020, EFJ 2021). This data confirms a tendency by policy-makers to adopt this type of subsidy, since it reduces the risk that they will be accused of preferential treatment towards particular outlets.

However, media owners often do not consider indirect subsidies as a type of a state aid at all, but rather as a kind of entitlement. In most cases, VAT reduction is not tied to any particular provision that media owners need to fulfil, such as safeguarding the working conditions of employees. In the case of Croatia, however, newspapers are obliged to introduce an internal regulatory act (statutes) in order to qualify for the reduced VAT rate. Overall, since this is not a targeted measure, the effects of reduced VAT rates on media pluralism, diversity, content quality and the status of journalists are debatable.

#### VAT rates for media in the EU

Country	Reduced rate (%)	Standard rate (%)
Belgium	0 and 6	21
Bulgaria	20	20
Czech Republic	10	21
Denmark	0	25
Germany	7	19
Estonia	9	20
Ireland	9	21
Greece	6	24
Spain	4	21
France	2.1	20
Croatia	5 and 13	25
Italy	4	22
Cyprus	5	19
Latvia	5	21
Lithuania	5	21
Luxembourg	3	17
Hungary	5	27
Malta	5	18

Netherlands	9	21
Austria	10	20
Poland	8 and 5	23
Portugal	6	23
Romania	5	19
Slovenia	5	22
Slovakia	10	20
Finland	10	24
Sweden	6	25
Serbia*	10	20

\*non-EU member

#### 4. Serbia: generous public support and the threat of political parallelism

Project-based co-financing of public interest content in Serbia was introduced as a result of changes to media legislation<sup>2</sup> in 2014. The idea was to “regulate a chaotic media scene and ensure media integrity in a semi-democratic society” (Barlovac 2015), with the clear aim of transforming the role of the state in the media sector. In countries that have signed accession agreements with the EU, the diversification of media ownership (primarily privatisation) is considered crucial for media pluralism and integrity. Media owned by local municipalities, and by the state in general, were regarded as biased, heavily influenced by political agendas and, generally, incapable of fulfilling their democratic role. Thus, the new legislation envisaged a process of privatising local public media. While changes in media ownership were – for the most part – regarded as positive, a number of journalists and media workers were sceptical of the outcome. They were concerned that political pressures would simply be replaced by market-related ones (Balkaninsight 2015). To offset such concerns, media subsidies were introduced. However, as reports by civil society organisations and other independent stakeholders show, political actors in Serbia still have the upper hand when it comes to allocating funds on all levels.

Over the last two decades, media systems in Southeast Europe have been in a state of transformation as a result of demands for de-regulation, i.e. limiting the influence of the state. The outcome, however, has been disappointing. A manifesto adopted by the SEE Media Observatory Conference 2016 underlines the need for “radical reform [that] calls for active involvement by the governments which are obliged to provide and protect the communication rights of people” (Bašić Hrvatinić and Petković 2016). Demands that governments play a more active role in shaping the media landscape were thus driven by perceived failures in the model favouring commercial orientation and the withdrawal of the state from media ownership (Popović 2017).

As 2011 research on Serbia’s media landscape shows, the country’s media market at the time was poorly regulated, with the media system overall failing to fulfil its democratic role (Matić 2012). With more than 2,600 media outlets recorded in the Media Registry, the Serbian media environment could be characterised as abundant and this has been the case for the past 20 years. Prior to changes related to privatisation and project co-financing of media content that were implemented in 2014, state funding of media was considered “unregulated, unmonitored and non-transparent” (Matić and Valić Nedeljković 2014). The majority of funds for media were allocated directly from public budgets on various levels (state, Vojvodina province, local authorities), while less than 10% were distributed on a project basis. It was basically “a form of state aid that facilitated the survival of media outlets in an underdeveloped and impoverished media market” (BIRN 2014).

<sup>2</sup> These included the Law on Public Information and Media, Law on Electronic Media and Law on Public Service Broadcasting.

Authors of a report on media integrity in Serbia claim that “state financial aid is allocated arbitrarily, i.e. on political grounds, and without supervision” (Matić and Valić Nedeljković 2014).

Project co-financing of media content production was re-designed to address those deficiencies, with the public interest established as an overarching goal. Public interest refers to, inter alia, media content aimed at enhancing human rights and democracy, as well as promoting professional standards in journalism and media.

According to the Law on Public Information and Media, the Serbian Ministry of Culture and Information, the Autonomous Province of Vojvodina and local governments allocate resources for projects on an annual basis. They prepare calls for proposals with application criteria that include the project purpose and grounds for eligibility<sup>3</sup>. Specific criteria include, for instance, the overall relevance of the project in terms of the public interest, as well as ethical standards. The latter refers to decisions issued by the Press Council and the Regulatory Authority for Electronic Media, whereas media which have been issued a formal warning and/or have failed to act upon it are barred from taking part in the application process.

Applicants must define which target groups are intended to benefit from the activities proposed (for example, socially deprived communities, national minorities, Serbian citizens living abroad etc.). They should also explain the financial and organisational sustainability of the project and include innovative production elements.

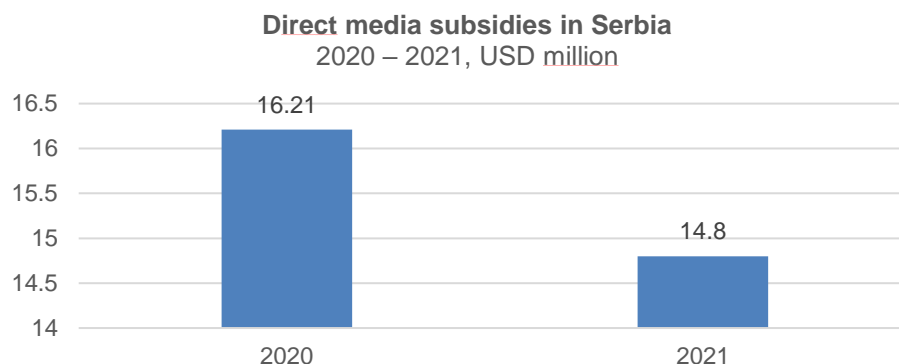
One of the most important innovations of the model is the make-up of the commissions that evaluate the applications for funding. Three to five members, appointed by the state or local authority, must be independent media experts or media workers, and have to meet specific anti-corruption criteria. The majority of commission members should be appointed on behalf of professional journalists' and media workers' associations. However, individual submissions are also welcome.

Each applicant is limited to one project per call, while the owners of multiple media outlets can submit one project per outlet. Up to 80% of project costs are financed but cannot exceed the maximum amount set. For instance, in 2015, the Ministry of Culture and Information set a floor of \$4,000 and a ceiling of \$40,000 for co-financing in the expectation that local authorities would introduce a similar practice. Data on resource allocation show that discrepancies in funds among local authorities are huge and depend on their fiscal capacity (as well as being subject to arbitrary decisions of local politicians). On average, local governments invested just 1% of their annual budgets for this purpose. In total, 90% of those funds have to be distributed via project co-financing, while up to 5% are dependent on an autonomous (arbitrary) decision by authorities, according to public procurement rules. The remaining 5% are intended for co-financing the organisation of and participation in various conferences as well as improving ethical and professional standards of journalism and media production.

From 2015 to 2021, a total of approximately \$93.2 million was allocated by all the entities for almost 14,000 projects, with the majority of these being financed by local government (78% of total funds, 71% of total projects).

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<sup>3</sup> Publicly owned media outlets and other entities, as well as media outlets which are not part of the Media Registry are not eligible.



Source: Center for Sustainable Communities, 2021

The Balkan Investigative Reporting Network and a coalition of civil society organisations (BIRN 2021) recently conducted an analysis of grants allocated over a three-year period (2019–2021) which showed that almost two thirds of grant recipients received regular support. These findings suggest that project-based grants are actually used to finance day-to-day media operations. Moreover, 40% of grantees received subsidies for three or more projects. Civil society organisations, professional journalists' associations and other stakeholders, such as those working in the field of democracy assistance in Serbia have followed and evaluated this model since it was introduced. In addition to the database created by BIRN, the Centre for Sustainable Communities has collected and shared data on co-financing (Centar za održive zajednice 2021).

While, in general, media professionals and experts regard the Serbian co-financing model as positive, they have raised concerns over its implementation and after-effects. Since media organisations, especially on the local level, depend heavily on this type of aid, more transparent procedures and improvements in eligibility criteria are needed. Recommendations also include a more thorough evaluation of project outcomes, an element which appears to have been missing to date.

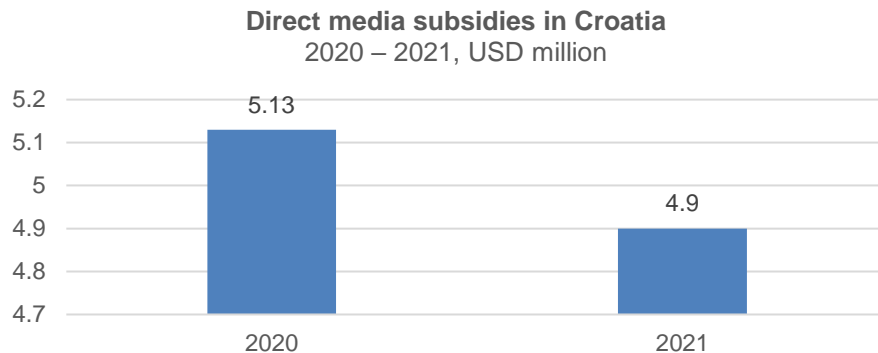
## 5. Croatia: state aid as a last resort for local media

State media subsidies in Croatia are distributed within the Electronic Media Diversity and Pluralism Incentive Fund, which operates under the aegis of the national media regulator, the Electronic Media Council, and the associated Agency for Electronic Media<sup>4</sup>, an independent regulatory body tasked with promoting the public interest in a pluralistic media environment and enhancing media diversity. Established in 2005, the Fund was a mechanism for subsidising public interest content on commercial local radio and television, while non-profit news sites became eligible much later, in 2013<sup>5</sup>. The “public interest” refers to general public information as well as content that promotes cultural diversity; develops education, sciences and the arts; improves the status of women, national minorities, disabled persons; and helps protect the environment etc. There are 16 thematic areas in total, as stated in Article 71 of Electronic Media Act and in the Fund Rule Book (AEM 2017). Besides content production, funds can be used for creating employment opportunities for media workers. Both annual and multiannual applications are envisaged.

<sup>4</sup> The Agency for Electronic Media is governed by the Electronic Media Council. Seven members of the Council are appointed by the Croatian Parliament.

<sup>5</sup> While, across the European Union, it is predominantly non-profit media producers who receive this type of support, in Croatia, local and regional commercial television and radio outlets have been eligible to apply for funding since the Fund was established. This remains a matter of concern for non-profit media workers and media experts alike.

The public broadcasting licence fee is the primary source of funding – 3% of the total monthly income from the fee is allocated to the Fund. This amounted to approximately \$4.9 million in 2021. In 2020, \$5.13 million was disbursed (AEM 2021).



Source: Agency for Electronic Media and author's calculations.

From the perspective of the European Union, the Fund allocates two types of subsidies. The first is *de minimis* aid (EC 2013) which are essentially European micro-grants. While the scheme does not require approval from the EU's market competition authority, these grants are limited to \$217,000 per applicant over a three-year period. This line of financing is considered to be a primary source of support for non-profit media, especially for online media outlets and media content producers<sup>6</sup>. In this category, projects can be funded in full. In the 2021 budget, a total of approximately \$380,000 was allocated to 61 projects submitted by non-commercial media producers. However, funds received by single applicants were significantly lower than expected. This could pose a challenge for producers and have a negative impact on the end results.

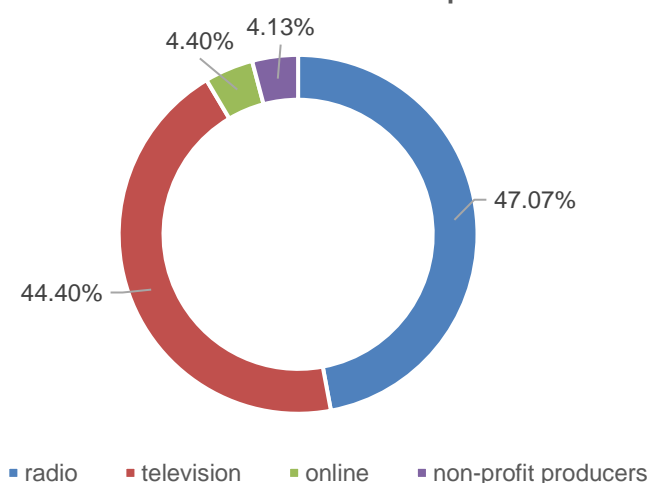
The second type of subsidy is – in the vocabulary of European competition rules – state aid. This means it cannot distort the market and must be in line with the regulations of the Competition Agency. Funds are intended for television and radio content production, both commercial and non-profit. Since the regulation on state aid is applied, only up to 50% of the estimated costs can be funded. This percentage can be increased by up to 30%, based on a set of criteria that include target groups (disabled, victims of gender-based violence, refugees etc.), content (art and culture, heritage), and content in national minority languages.

Overall, 46.5% of the Fund's annual budget is intended for non-profit and commercial audiovisual outlets and producers (local and regional commercial television and non-profit television), with the same percentage for local and regional commercial radio and non-profit radio. Non-profit electronic publishers (online) can count on 5% of funds. The remaining 2% goes to non-profit producers of audiovisual and radio content exclusively.

<sup>6</sup> General legislative term for online media in Croatia is electronic publications.



**Distribution of the Croatian media pluralism fund**



Source: AEM 2021

Commercial radio and television stations on the local and regional level, as well as non-profit television and radio outlets can submit up to five different programmes, while only one application covering up to five thematic areas can be submitted by non-profit online media content producers<sup>7</sup>.

Programmes are evaluated according to four main criteria:

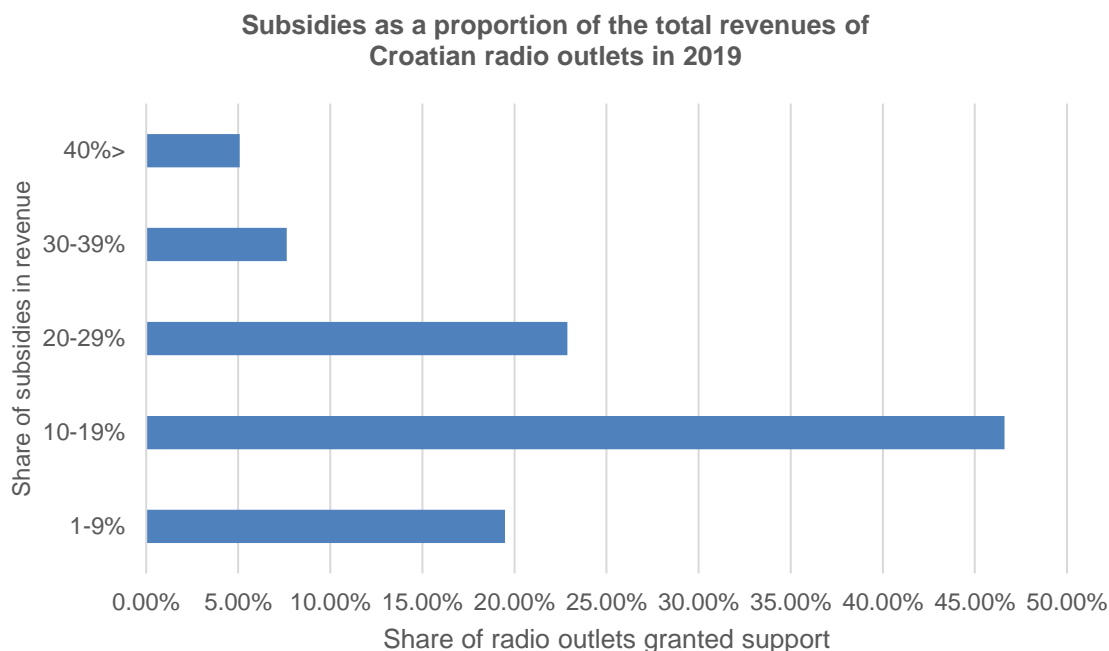
- The significance of the programme for public interest and other goals (16 thematic areas);
- Quality and innovation in content creation;
- Interest for general and local cultural development;
- Accessibility of the content to persons with disabilities.

Each programme can score up to 100 points for each of these criteria. Additional criteria can be set in a specific call for proposals, where a threshold (minimum points) for receiving a grant is also established (AEM 2017).

Media producers or outlets eligible to be funded have to meet a catalogue of criteria, starting with general compliance with the Electronic Media Act. Furthermore, they are expected to enact internal regulations (akin to newsroom statutes) that uphold professional and ethical standards. They must also have no history of misusing public funds. Producers are obliged to meet administrative and financial provisions that reflect their capability to achieve the overall goals of the project. Failure to follow any of these requirements results in ineligibility to participate in the competition procedure. Members of the Council for Electronic Media are tasked with grading the applications, although expert panels (commissions) with a minimum of three members can be appointed as well.

Although conceived as a supplement, recently published research on the societal impact of the Fund from 2016 to 2019 (Šalinović et al. 2021) showed that local commercial radios and televisions heavily depend on its subsidies. For almost half of the radio outlets which received funding in 2019 and for which this type of analysis was carried out, the subsidies accounted for between 10 and 20% of total revenue, while for another third, this proportion was as high as 40%. Over a four-year timeframe (2016- 2019), general public information formed the largest portion of subsidised content (34,07%). The largest share of subsidies for local commercial televisions was in the same thematic area (30,58%).

<sup>7</sup> A programme or content unit refers to an article or a podcast, for example.



Source: Šalinović et. al (2021)

From the outset, creators of this system of subsidies had envisaged that income from the advertising market would be sufficient to cover the news production costs of radio and television outlets while the Media Pluralism Fund would provide an extra financial boost. However, as the data shows, many radio and television outlets on the local level would simply cease to exist without the Fund, or, at least, would not be able to perform their public service role, thus in all likelihood violating the terms and conditions of their respective grant contracts. This is in line with findings that the proportion of radio stations' revenues that was represented by grants increased from 5 to 12% over the period from 2007 to 2012. State aid for local televisions is even more critical: in 2007, grants accounted only for 2% of revenues, while by 2012 this proportion had increased to 19%. In this sense, the importance of state media subsidies is self-evident – the local media market in Croatia would not be able to exist without them.

## 6. Swedish media subsidies: public support for general news

There are five types of direct subsidies for Swedish media, which amounted to \$159.73 million in 2020 (MPRT 2021, Facht and Ohlsson 2021: 20 – 23).<sup>8</sup> Two of those – approximately half of the budget – are traditional subsidies available only for the production and distribution of “regular news services or political opinion” (SFS 1990: 524) in written and printed form<sup>9</sup>.

Introduced in 1970 and 1971, newspapers subsidies have evolved over time, but have always been based on two premises. The first is that leading newspapers – measured in terms of national or local markets – are capable of selling enough copies and adverts to fund journalism on their own, while smaller outlets need state support to survive and maintain the desired level of pluralism of information and ideas. The second assumption is that any media policy tool is most effective when it maintains neutrality in relation to the political agenda of those who implement the policy. So the preferences of the 14 members of the government-appointed Media

<sup>8</sup> To this \$16.29 million of special Covid-19 assistance should be added (Facht and Ohlsson 2021: 20 – 23).

<sup>9</sup> The Press Subsidies Statute excludes specialised newspapers, i. e. those “mainly focused on special areas of interest or parts of society, such as trade and industry, business, consumer politics, environmental issues, sport, outdoor activities or matters related to the church and religion” (SFS 1990: 524).

Subsidies Board and their views of specific newspapers are irrelevant – if certain criteria are met, these press subsidies are awarded automatically.

A small subsidy for distribution, amounting to \$5.47 million in 2020 (MPRT 2021), is allocated to all newspapers sold for a price that does not diverge significantly (i.e. more than 25 percent) from that of the competition and that is distributed by the postal service or a joint newspaper carrier (it is important that publishers do not distribute their newspapers alone, but in cooperation with at least one other publisher). The value of the distribution subsidy had been higher for lower circulation titles but it has been fixed at \$0.02 per subscribed copy since 2020 (SFS 1990: 524). Historically, this subsidy had played an important role since home delivery is an essential form of distribution in Sweden where there are very few newsstands. Some high-profile national dailies still receive around \$300,000 annually from this source (MPRT 2021).

The most generous of all the Swedish media subsidies, amounting to \$67.3 million in 2020 and \$79.95 million in 2021, is the operational subsidy for newspapers (MPRT 2021). The basic rules are that:

- The newspaper must be published at least once a week;
- Its share may not exceed 30 percent of the given market, although it must have at least 1,500 subscribers (SFS, 1990: 524);<sup>10</sup>
- At least 55 percent of its content must be original (MPRTFS, 2016:1).

For medium and high periodicity newspapers – published three to seven times a week – an additional requirement is stipulated: their position in the advertising market may not contradict the published circulation figures. At the other end of the spectrum, hyperlocal newspapers that come out once or twice a week need to publish at least 1,000 metres of columns<sup>11</sup> of journalistic text per year, while paid adverts may not exceed 50 percent of the available space (SFS, 1990: 524).

If all conditions are met, the value of the subsidy depends on the circulation and the prescribed algorithm. Better sales figures are multiplied by lower rates stipulated by the Press Subsidies Statute, and vice versa, with maximum grant ceilings set for each bracket. For example, a daily newspaper that sells, on average, 50,000 copies seven times a week would fall into the bracket for highest weekly circulation – of 251,000 copies and above – which, multiplied by the rate of 27,500 kronor for that bracket, makes for a grant of 9.625 million per year (equivalent to \$1.1 million). The largest grant may not exceed 14.238 million kronor. The next bracket down, for a weekly circulation of between 71,000 and 251,000 copies, has a higher rate of 33,000 kronor and the highest grant is capped at 5.94 million kronor, etc. The smallest hyperlocal weeklies, which sell at least 1,500 copies (or 750 if they are mainly published in minority languages), receive an annual grant of 1.763 million kronor, which is around \$210,000 (SFS 1990: 524).

The Press Subsidies Statute was set to expire in 2017 (Ots 2011, p. 311). However, economic, technological and workplace dynamics – especially the rise of the Internet as a primary news distribution channel and the dramatic fall in newspaper advertising revenues – persuaded Sweden's media policymakers to rethink the direct subsidy model. As market income declined, newspapers had grown even more dependent on subsidies. Far more than just an allowance to employ a few journalists or an extra fact-checker to gain a competitive advantage, the operational subsidy had become the main means of survival for many newsrooms across the country. However, since the level of the subsidy was “pegged” to circulation figures, certain adjustments were necessary. Some publications, which previously covered more than 30 percent of targeted households and which were thus unsupported, fell below the threshold and, therefore, became entitled to a subsidy. Some newspapers started to sell subscriptions for their digital platforms and, eventually, chose to limit their operations to online only.

For national or larger regional dailies, the impact of lost revenue on staffing levels, working conditions and professional standards may have been manageable but, for smaller media in many local communities, it represented an existential threat. National media, which were unable to cover an event in the capital, could

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<sup>10</sup> If a newspaper's original content is mainly in the languages of the Sami or Meänkieli ethnic minorities, a subscribed circulation of at least 750 copies is acceptable (SFS 1990: 524).

<sup>11</sup> A column is, according to the Swedish media regulator, 45 millimetres wide (MPRTFS, 2016:1).

always rely on duty reporters to source the necessary information from the internet, press releases or other media but, at the local level, a newsroom may be the only source of information and financial pressures mean that important local events can simply fall off the news agenda.

These issues were addressed by Swedish policy-makers in “A media policy for the future”, which was launched by the Ministry of Culture and Democracy in 2015. Media subsidies were discussed, together with the role of public broadcasting and the media system as a whole. A series of studies, public consultations and reports proposed the idea of “platform-neutral media subsidies” and, consequently, as reported by Nordicom<sup>12</sup>, the government’s media inquiry recommended that “Swedish press subsidies should be replaced with a broader media subsidy. In addition to printed newspapers, the digital media, free media, and news agencies would also be able to receive financial support for news production” (Nordicom 2016, SOU 2016: 80).

Now, the operators of a generalist news website in Sweden can apply for three types of direct state subsidies: (1) innovation and development; (2) local journalism; and (3) newsroom operation. These media subsidies are technology-neutral (Facht and Ohlsson 2021), i.e. available regardless of the format or platform for production and distribution (written, radio, television). The only condition is that content must qualify as general news. A “general news medium” is defined by the Media Subsidies Statute as “a medium whose primary task is to conduct news coverage and which has an editorial<sup>13</sup> content, consisting of regular and comprehensive news that covers a wide range of topics and perspectives while scrutinising events important for democracy” (SFS 2018: 2053).

But which conditions need to be fulfilled? A certain proportion of original content was already part of the methodological repertoire for newspaper subsidies, albeit only for “low-frequency” editions, published once or twice a week.<sup>14</sup> Now it has been extended and recalibrated to all media in order to encompass “editorial content that makes for at least 50 percent of the entire content”. Furthermore, 20 percent of the entire media space/time should be allocated to originally produced “news coverage and commentary”. Other general criteria for platform-neutral support in Sweden are that:

- Content is publicly available;
- The outlet its own publisher, title and independent newsroom;
- Journalists follow good professional practice
- Content endeavours to be accessible to persons with disabilities;
- The outlet targets audiences in Sweden;
- Content is published/broadcast at least 45 times per year and has at least 1,500 regular users (SFS 2018: 2053).

The Swedish Press and Broadcasting Authority, the regulatory agency that hosts the Media Subsidies Board, has put in place a set of precise regulations to be followed during the preparation and assessment of applications for media subsidies, as well as for reporting on the use of grants (MPRTFS 2021:2, MPRT 2022, MPRT 2022a).<sup>15</sup>

Furthermore, a more significant change for the transition to a technology-neutral era is that Swedish media subsidies are no longer awarded “automatically” by algorithm. They are instead subject to the availability of funds (SFS 2018: 2053) and allocated according to an informed decision-making process. The Media Subsidies Board no longer simply checks that all technical requirements are met or limits its activities to overseeing the process.

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<sup>12</sup> An institute for media studies with the mandate to “collect, synthesise, and disseminate knowledge about media development in the Nordic region” associated with the University of Gothenburg and funded also by the Nordic Council of Ministers and the Swedish Ministry of Culture.

<sup>13</sup> “Editorial content” means all media content excluding ads (SFS 1990: 524).

<sup>14</sup> See supra.

<sup>15</sup> For instance, news content needs to include at least 1,000 metres of text columns (45 millimetres wide), or 2.25 million text characters per year, or 2,700 minutes of broadcast, thus making for at least 50 percent of the entire content. Measuring that as well as other requirements may be provided by a private media audit firm (Kantar Sifo), or by third-party traffic measurement tools (such as Google Analytics) certified by a public auditor (MPRT 2021a).

Instead, the Board has to “pay particular attention to the extent to which planned interventions ... can be expected to contribute to the fulfilment of the purpose of media support [which is] to strengthen democracy by promoting public access to independent news coverage throughout the country through a variety of general news media with high-quality editorial content. Prioritisation is done through an overall assessment. Special consideration shall be given to... journalistic coverage in areas that are completely devoid of journalistic coverage ... The Media Subsidies Board uses evaluation criteria for respective forms of support” (MPRT, 2021a).

These criteria for newsroom subsidy are (1) the applicant’s contribution to the diversity of news content, (2) accessibility, and (3) long-term sustainability (MPRT 2021a). A total of \$10.6 million was granted in 2021 to 108 newsrooms and was used to cover the salaries and benefits of employees and freelancers; office rent and supplies; and the depreciation of equipment as well as internet access, telephone and other costs associated with the daily newsroom operation and journalistic production (MPRT 2022b).

An innovation and development subsidy had already been introduced in 2016.<sup>16</sup> It was intended for the development of digital distribution channels, related original content and associated business models (SFS 2018: 2053) and amounted to \$2 million in 2021. When prioritising applications, the Board assesses (1) the nature and degree of innovation, (2) feasibility, and (3) the perceived contribution to the long-term development of the newsroom. If the applicant has previously received a grant for a similar project, other applications may have priority (MPRT 2021a). A total of 35 applications were approved in 2021.

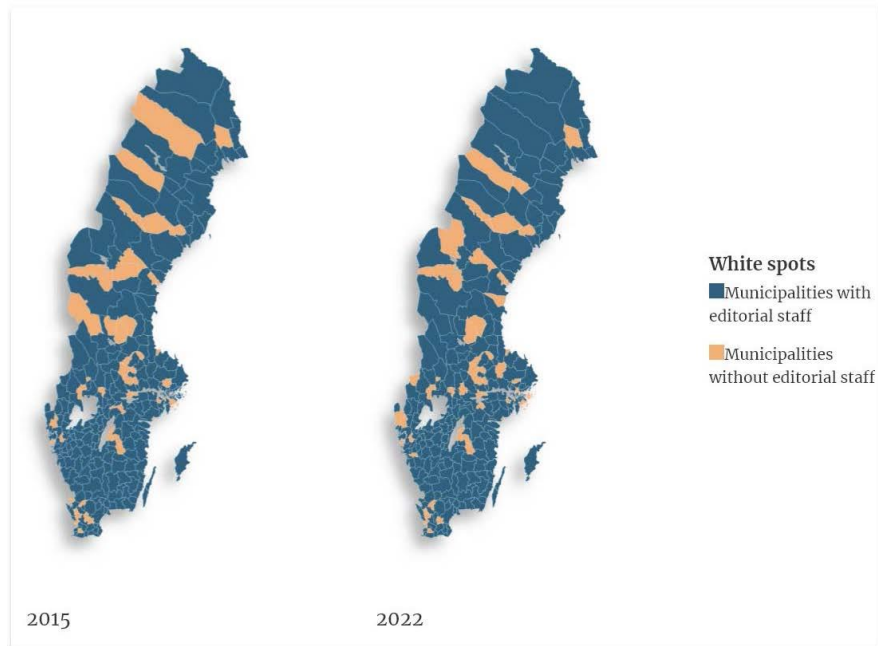
In Sweden’s media policy ecosystem, regular collection and analysis of information on media and its audiences plays a prominent role. Besides the aforementioned and internationally renowned Nordicom Institute in Gothenburg, the Institute for Media Studies based in Stockholm, maintains a database tracking the “survival” of news media in local communities. Since 2015, when the Institute started its monitoring work, “newsroom presence” in Sweden’s municipalities was shown to have decreased by 14% (Mediestudier 2022).<sup>17</sup>

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<sup>16</sup> Before 2019, the *utvecklingsstöd* was available only to newspaper companies.

<sup>17</sup> “There are 525 editorial offices ... which produce content for 395 different media”, according to the Institute for Media Studies website. “The newsrooms are currently located in 228 municipalities, which means that 62 municipalities do not have an editorial office, compared with 54 when we started measuring (Mediestudier 2022).”

## News Deserts in Sweden: 2015 – 2020

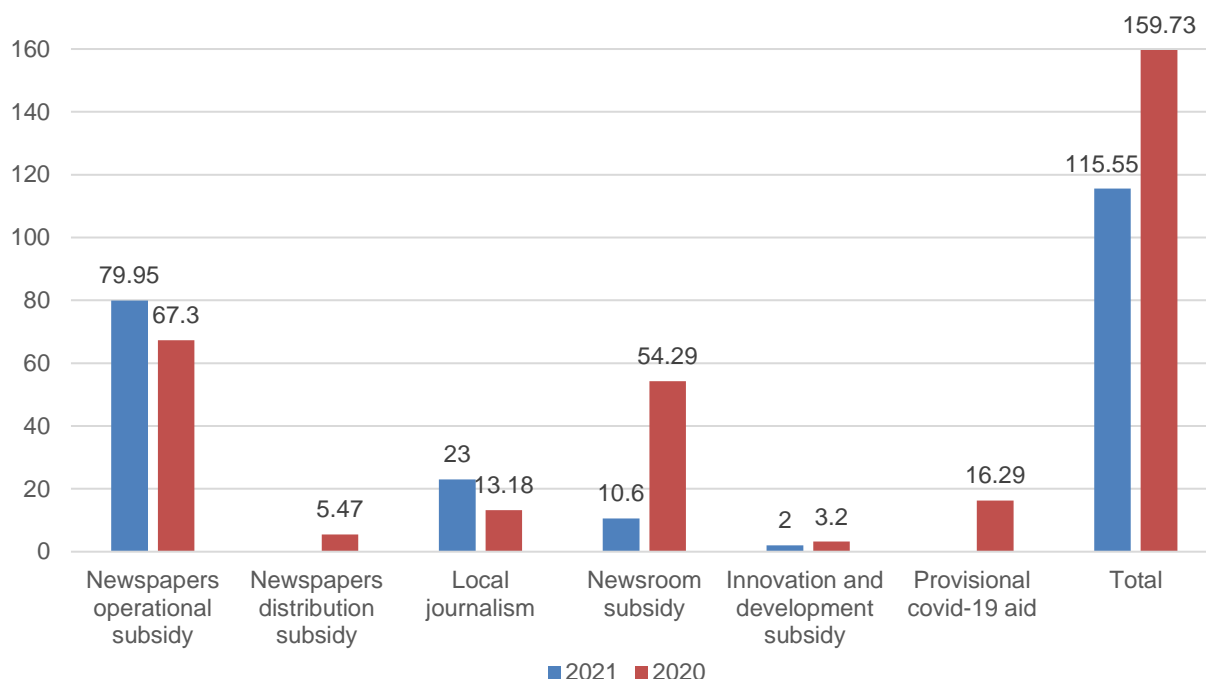


Source: *Mediastudier.se*

These news media “blind spots” are the focus of the local journalism subsidy. The Media Subsidies Board’s evaluation criteria for its allocation to a new media operation – or to an existing newsroom’s expansion – are (1) the outlet’s contribution to journalistic coverage of communities without media; (2) the outlet’s long-term sustainability; (3) the scope of journalistic coverage in the target area; and (4) the geographical distribution of the subsidy (MPRT 2021a). In 2021, around 200 newsrooms received subsidies and nearly 100 three-year grants were awarded, amounting to \$23 million.

Together with provisional support related to Covid-19, direct subsidies to news media in Sweden amounted to the value of \$159.73 million in 2020, and \$115.55 million in 2021, which makes for one of the most substantial systems for public support for media in the world (Ots 2011), even without including indirect subsidies – discounted VAT rates etc – and funding for the public service broadcaster. Furthermore, the subsidies are overtly awarded to support everyday newsroom operations, i.e. journalistic work. This means that, in this context, content does not need to have a demonstrable public service focus (e.g. related to human rights, environmental issues or the arts), or be in any way “special” in order to qualify for public support.

### Media subsidies in Sweden 2020 - 2021, USD million



Source: Myndigheten for radio press och TV; authors' calculation

On the contrary, it is general news reporting and commentary which are considered to be in the public interest and, therefore, deserving of subsidies which insulate them against the vagaries of the market and changes in technology.

Another important aspect of the system – at least at the present time, if not overtly at the beginning – is a generally cordial approach to the Swedish media business. For decades, the newspaper market has been heavily concentrated (Ohlsson 2021). This means that a few big publishers (such as Bonnier AB or Stampen Lokala Medier AB) own a large number of subsidised local newspapers (thus making the case for regulations on the proportion of news content or locally produced content and on the ceiling of 40 million kronor for subsidies). In a platform-neutral environment, pluralism is probably more pronounced, but, as the director of Nordicom concluded, “The ten largest newspaper companies in the Nordic region ... control some 400 newspaper titles, including subscription newspapers, single-copy sale newspapers and freesheets – distributed in print and/or online” (Ohlsson 2021). It can be argued that several “sustainability” and “visibility” requirements featured in the regulations – which clearly do not favour non-profit start-ups – owe their prominence to the “neoliberal policy shift”. This diagnosis sees “the role of the state ... reduced to ensuring that a functioning market existed, while cultural goals of diversity and pluralism were sidelined” (Jakobson et al. 2021).

On the other hand, since the Swedish system prohibits the share of total grants received from surpassing 75% of the annual operating cost of a newsroom, the balance sheet must be presented to the Media Subsidies Board (SFS 2018: 2053). This can work as a safeguard against providing subsidies which simply increase profit margins. In any case, the influence of business actors is, at least, part of the reason why the system of direct subsidies was designed as a counterpoint to the automated system of indirect subsidies. Due to technological change, however, this approach needs to be abandoned in favour of a certain level of prioritisation among applicants on the basis of evaluation criteria. The Media Subsidies Board has developed an extensive set of formal requirements and rules that represent an effort to narrow the ambiguous space that



exists in the evaluations of the government-appointed Media Subsidies Board as far as possible. However, tensions persist.<sup>18</sup>

## **7. European Union: the EACEA's commitment to transparency and details**

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While members of the Swedish Media Subsidies Board assess applications in a holistic manner, the European Commission's Education and Culture Executive Agency (EACEA) adopts a very different approach to the evaluation of project proposals in the framework of the Creative Europe programme. This is a "systematic", tightly structured evaluation procedure. Criteria are divided into sub-criteria, corresponding to the themes and priorities of the specific programme on one hand, and the exact number of points that may be awarded in each category on the other.

Two independent expert evaluators, appointed by the EACEA after a public call, analyse the project's documentation and award points according to the scorecard, providing a detailed written account of the decision-making process. Peer review of Sweden's Media Subsidies Board considers the overall impression given by the media operation or the project proposal. Under the "holistic" approach, the evaluation may be greater than the sum of its parts but it is the details that matter most in the European Commission's methodology. A web application simply tots up the points awarded by the EACEA's peer reviewers and presents the winning bids.

Following the first call for proposals for the grant programme entitled "Journalism Partnerships", that was launched in 2021, seven consortia of news media organisations shared €8 million (EC 2022a)<sup>19</sup>. This forms part of wider EU support to the news media sector, introduced at the beginning of the decade. After a long period of reluctance to award direct grants to news media<sup>20</sup>, the EU's media programme now totals more than €100 million for the financial period 2021–2027. With the goal of addressing "structural challenges", the Commission has allocated €12 million for media freedom and pluralism, €44 million for collaboration and evaluation and €46 million for citizen engagement and the public sphere (EC 2022b).

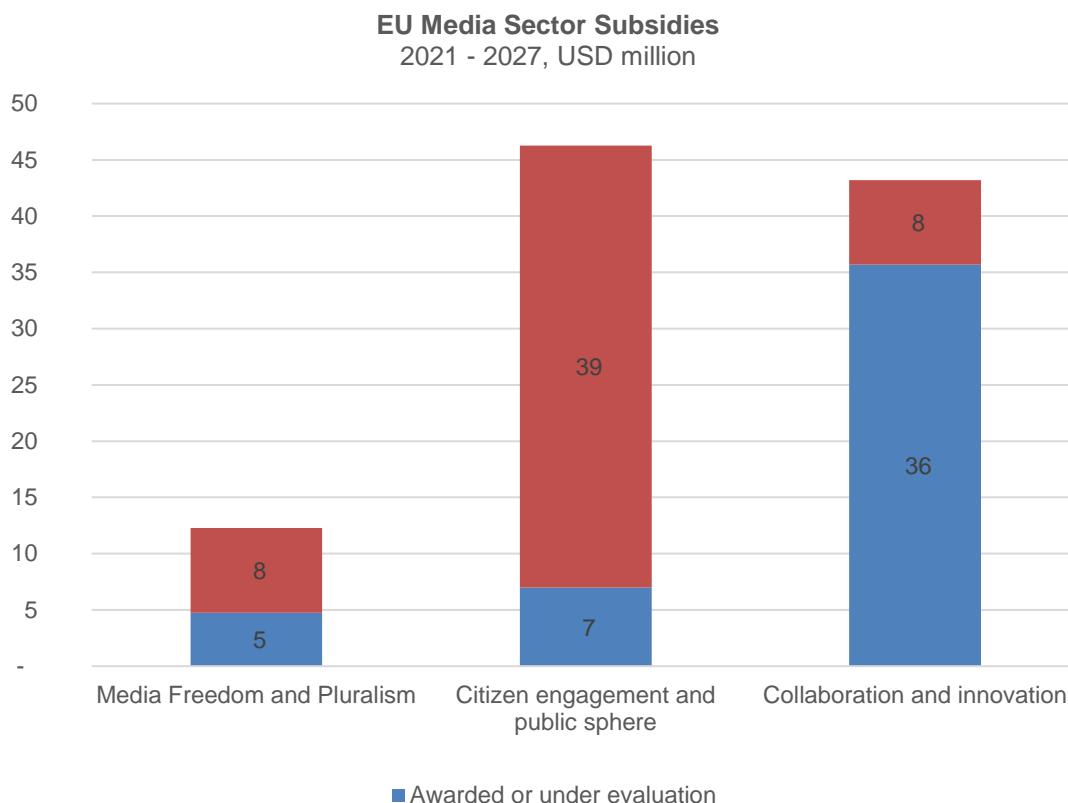
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<sup>18</sup> For instance, one distinguished member of the Board resigned in 2022, stating dissatisfaction with awarding a subsidy to the right-wing news site Bulletin, and arguing that the information on the applicants is generally insufficient to be able to make an informed decision (Nesser 2022).

<sup>19</sup> Approximately the same amount in US dollars.

<sup>20</sup> The European Commission's media strand of Creative Europe funding traditionally focused on support for film, television and the gaming industry.





*Source: European Commission*

In order to assess the criteria set and to determine whether or not the evaluation and scoring technology really works, we will examine the €8-million “Journalism Partnerships” grant scheme. For project proposals that have fulfilled all the formal requirements, four groups of criteria are applied, each carrying 20 or 30 points:

- (1) Relevance (maximum score of 30 points)
- (2) Quality of content and activities (30)
- (3) Project management (20)
- (4) Dissemination (20)

Each of these groups has two or three sub-criteria, carrying 5, 10 or 15 points of the maximum of 100. For example, 15 points are the maximum awarded for “the relevance of the project vis-à-vis the objectives of the Call for Proposals, including its European dimension, the number of countries and languages covered, and the diversity of countries/regions involved, taking into account their media capabilities as well as benefits for regional, local or community media”. This is followed by 10 points for “the relevance and innovation of the proposed activities vis-à-vis the needs of the chosen (sub)sector and target countries/regions substantiated by a needs analysis and analysis of already existing initiatives”.

In another words, the evaluators consider what is being offered; what is needed; and what is already in place. The final criterion in the “relevance” bracket carries five possible points for gender balance, diversity and inclusion. The “quality” criterion breaks down as follows: how the project will be implemented (10 points); collaboration, diversity, impartiality and editorial independence (10), cost-efficiency (10) etc. (EACEA 202, p. 16).

The web application invites the evaluators to provide comments (up to 5,000 characters) on how the points were awarded for each sub-criterion. The EACEA hosts consultations among staff and evaluators to resolve all

dilemmas and align the yardsticks that are used.<sup>21</sup> Experts working for the EU are reasonably well paid for their services. Their names are published (although often “buried”) on the Commission’s website, however, the identities of the evaluators for any specific project are not revealed. Explanatory comments (such as “why did my proposal score only one point for the experience of the project team?”) are available. Proposals that are awarded more than 70 points “will be considered for funding – within the limits of available budget” and the applicants are notified that they have progressed into the grant preparation phase. This involves negotiation with the EACEA, primarily to “fine-tune technical or financial aspects” and “address the recommendations of the evaluation committee” (EACEA 2021, p. 15).

The methodology of Swedish media subsidies suggests that there is some room for interpreting the criteria. However, even in platform-neutral strands, grants are precisely calculated in relation to actual newsroom expenses.<sup>22</sup> Conversely, while working towards an impression of “objective” evaluation, European Union schemes provide opportunities for reasonable adjustments of the scale, focus and the implementation strategy of the media supported. We may be tempted to interpret these differences in the light of different political settings and practices. However, European Commission schemes were developed within the realm of new public management and associated ideals of efficiency “imported” from the business arena. Although it may have been steered towards a similar set of values during recent decades (Jakobson et al. 2021), the Swedish system was inaugurated during the Fordist era which was marked by welfarism, public service ethos and corresponding notions of justice.

## 8. Conclusions

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Direct subsidies are a mechanism for both supporting the production of public interest content and for investing in high-quality journalism in general. In that sense, they are more targeted and goal-oriented than indirect subsidies, such as VAT reduction. While this type of subsidy is widespread in Europe, its impact on the advancement of working conditions in the media, the production of high-quality content and overall accessibility has yet to be assessed.

The choice between subsidising routine journalistic work and distinctive “public interest” content may offer yet another interpretative framework. It surely represents a different set of policy challenges to preserve the everyday operation of public service journalism or to present a vivid modernising agenda. Be this as it may, instead of quick and easy recipes for a “good” methodology for subsidising news, we would like to suggest that supporting everyday journalistic work is, in fact, a far more modern and progressive approach.

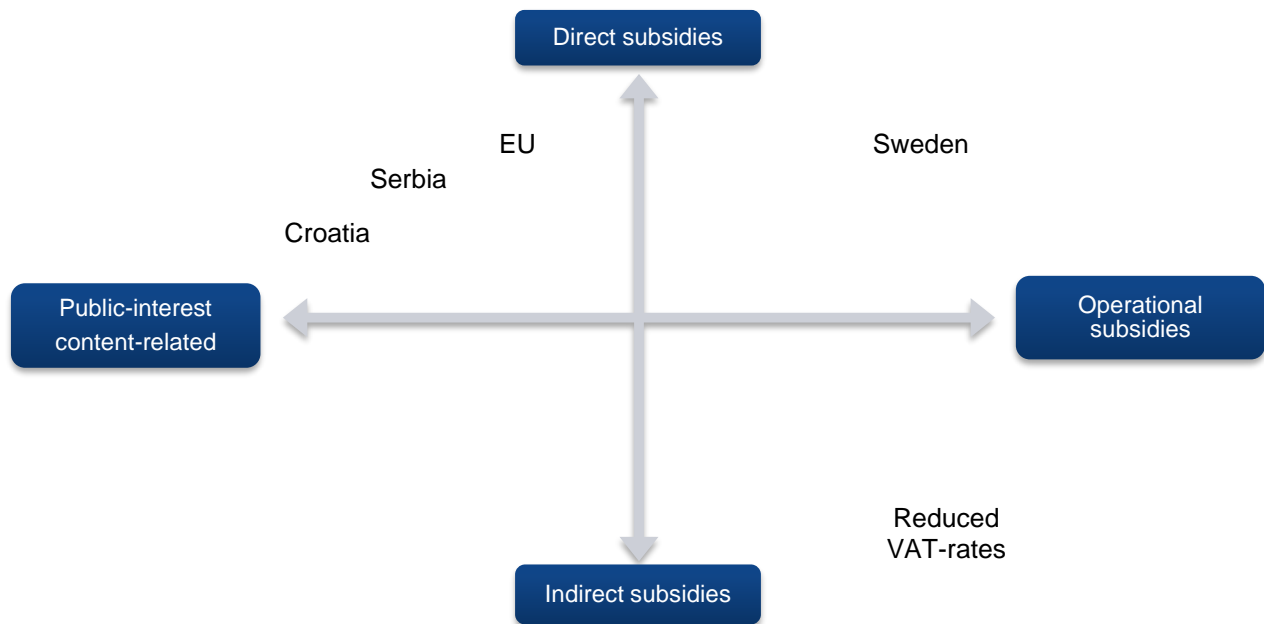
As shown in the matrix below, the cases presented in this report fall into three distinct categories. In the case of the European Union as a supranational entity, it may be understandable that media subsidies are considered to be complementary to mechanisms established in the Member States. In the cases of Serbia and Croatia, however, direct media subsidies should be far more than simply a supplement, but should rather be viewed as a central feature of the media system. As revealed by a recent study (SNH 2022), Serbia’s greater generosity seems to have had a direct impact on journalists’ employment in local media.

In both those cases, public interest is defined as something that is external to everyday newsroom operations. On the other hand, the Swedish model stands out as one that does not differentiate between public interest journalism and the routine work of the newsroom, with media workers as well as owners making the public interest a part of their daily job.

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<sup>21</sup> However, if the scores attributed to a single proposal by its two evaluators differ too much, one of them is designated as the decision-maker by the EACEA.

<sup>22</sup> For instance, newsrooms with an annual budget of between 5-10 million kronor will get 4.5 million kronor (\$525,000), provided that this does not exceed 75% of their annual expenses (MPRT 2022b).



In any case, the models presented in this report argue for the active role of governments in shaping the media landscape. With changes in the media economy brought about by the digital transformation and recent multiple crises, we consider state subsidies to be critical not only for enhancing the plurality and diversity of news media, but also for achieving sustainability goals.

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