

EPRA Strategy for 2024-2026

Inspire, share, strengthen

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Foreword

In 2017, the EPRA Executive Board first elaborated a three-year strategy to capture and reflect EPRA’s essential purpose and functions and to provide clarity on the direction and priorities for the network. Since then, every three years, EPRA Members are invited to review the last strategy’s implementation and to consider objectives and priorities to be set out by the Board over the next period.

The last strategy, drafted and adopted during the pandemic, was guided by the need for regulators to share knowledge to embrace the disrupting changes faced by the media sector. Three years later, Europe has witnessed armed conflicts breaking out and alarming levels of polarisation and hatred taking shape among society, enhanced by our new ways to interact. With this three-year strategy, for the period 2024-2026, the Board intends to address the expanding and blurred boundaries of media services, the changing mandates and the increasing expectations put on media regulators in times of change, while defining how EPRA can best support its Members.

The review of the strategy 2021-2023 has shown broad support from the Members for the current Vision, Mission and Values of EPRA and a continued relevance of the strategic objectives. This revised strategy sets out the complex context for EPRA’s coming work, intending to address new challenges and continuous changes in our environment. At the same time, the strategy reaffirms EPRA values, provides clarity on EPRA’s mandate and purpose and refines the strategic objectives to respond to the needs and expectations expressed by Members.

In 2025, EPRA will celebrate its 30th anniversary. Our success and longevity hinge on remaining relevant, ambitious, innovative, forward-looking, and yet realistic. EPRA's strength lies in harnessing collaborative efforts and Members' contributions: only together can we shape and secure a strong and meaningful network. I am confident that the strategy 2024-2026 will be of great help along the way. Thank you to all our Members for your important contributions!



Mari Velsand, EPRA Chair

1. Background, context and challenges

This is EPRA

An independent, neutral, non-political network: EPRA is a voluntary, independent network, which is strictly neutral and non-political in its approach and operations. Being a neutral, non-political network precludes the adoption of any common positions or declarations or the making of political statements at EPRA events. This approach is strengthened by the fact that EPRA is a self-financing, non-policy making body. EPRA is also transparent and accountable in its processes and procedures, as reflected in its open and consultative approach to developing and implementing its strategy, yearly Work Programmes and activities, and in the reporting to its Members. Informality is an essential facilitator for a fruitful and frank exchange of views and best practices between media regulators through the network.

An expert and an informed voice in European media regulation: EPRA organises plenary meetings bringing together its Members, as well as regularly convening online working groups on key topics of relevance for media regulators. In parallel, EPRA functions as a source of knowledge and advice, making a wide repository of relevant resources available to its Members. EPRA is committed to adapt to the demands and needs of regulators in a fluctuating and mutable landscape, with responsiveness and flexibility.

An outward-looking network: With the aim to serve its Members, EPRA cooperates with many stakeholders. This includes industry, academia, other networks of regulators and governmental and non-governmental organisations. EPRA's deliberations have been strengthened by regular participation by, and engagement with, the European Commission, the Council of Europe, the European Audiovisual Observatory and the Office of the OSCE Representative for Freedom of the Media (RFoM), all of whom act as permanent observers at EPRA meetings.

The oldest and largest pan-European forum of media regulators: EPRA was established in 1995 and is composed of 55 member authorities from 47 countries in Europe at the start of this strategic period. As a European forum, EPRA supports common values of the Council of Europe and the European Union, such as protection of human rights, democracy, rule of law and equality. EPRA has a distinctive and unique role, as a platform uniting regulators from the European Union, non-EU jurisdictions, and those aspiring for EU Membership, who share a common mandate, common goals and common regulatory challenges. EPRA Members can learn from and support each other in responding to common challenges.

The current environment

Since EPRA's foundation in 1995, the media sector in Europe has undergone profound changes which have been shaped by several political, economic, technological and social factors.

A tense geopolitical context: Seismic geopolitical changes, fuelled by the war in Ukraine, are drawing anew the map and the strategic priorities of European institutions as well as the respective footprints of the EU and the Council of Europe. In parallel, there are increasing concerns about the state of democracy in Europe. Reports from the EU and the Council of Europe¹ have documented the deterioration of freedom of expression in Europe as well as threats to the safety of journalists. The recent Israel-Hamas conflict also impacts on European societies, accentuating the risk of a democratic backsliding. In addition to armed conflicts, other major global crises, be it in the environmental (global warming) or health fields (Covid-19 pandemic), leave their mark on politics and societies across Europe. The strong political polarisation in the United States is also affecting Europe, as is the hitherto ambiguous approach of the US regulation of online platforms, torn between the wish to protect US platforms and operations abroad, and the need to address election manipulation and anti-competitive behaviour.

The advent of 'platformisation' and AI: Digitisation has revolutionised the traditional broadcasting industry, introducing complex forms of content delivery, both linear and non-linear, challenging it to find new ways of serving audiences while preserving its core values and remaining economically viable. In addition, data-driven platforms in their role as intermediaries of information have become a dominant force in the communications sector. The gatekeepers' role of global digital platforms, as well as the penetration of their economic and infrastructural extensions into the web and app ecosystems, is affecting the operations of media industries, production practices and news distribution, and undermines the relationship between media outlets and the audience. At the same time, artificial intelligence and machine learning based services and tools have made a quantum leap, raising both new risks and opportunities for the media sector. This is adding to already well-known issues such as the impact of algorithmic-driven content curation on the findability and the prominence of specific content.

Changing audience habits and expectations: All over Europe, and despite the great diversity of national media markets, people increasingly consume a mix of linear and non-linear services with a continuous trend away from traditional linear TV and an irrepressible growth of on-demand services. As European citizens more and more live their lives online, social media networks and platforms use has become prevalent. This shapes how people interact with each other, share information and use media. Research has documented a significant increase in the use of social media platforms to access news across Europe, while trust in news varies considerably according to the countries, paving the way to a wider spread of disinformation. There are also increasing risks of online harm, both for children and adults, and a growing number of users that are expecting effective online safety measures to be put in place.

¹ Sources: [Annual Report 2023](#) by the partner organisations to the Council of Europe Platform to Promote the Protection of Journalism and Safety of Journalists; European Commission [2023 Rule of Law Report](#); [State Of Democracy, Human Rights And The Rule Of Law](#) Report of the Secretary General of the Council of Europe 2023.

Disinformation challenges: The political instability, the new ways to consume and to produce news as well as business models encouraging clickbait content, have contributed to a growing polarisation of the public and political discourse. One well-documented side-effect of this is the viral spread and impact of “information pollution”, that has reached a global scale. One first difficulty is definitional, as there is no commonly shared definition of disinformation, even if key traits such as the incorrect/misleading character, harm, the actor’s intention and the economic or political gain have been identified. Another critical challenge is to develop appropriate responses as interventions can quickly become at odds with fundamental rights and universal principles, such as freedom of expression and freedom of information. As with all complex societal issues, there is no quick-fix and intricate strategies involving a wide range of stakeholders are required. Media and information literacy is an essential mechanism along with the preservation and the development of a trustworthy and viable media environment.

Content funding challenges: On the supply side, the way content is financed and distributed has profoundly changed as a result of digital transition; the COVID-19 pandemic acting as an accelerator of existing trends. Subscriptions, advertising and public funding, the main sources of revenue in Europe, have stagnated in the last few years while growth is primarily driven by video on demand. Faced with rising production costs, and the increased competition from well-funded global streaming services, European broadcasters are forced to rethink existing programming strategies from linear to online and diversify content delivery. This raises particular challenges for public service media, as they are expected to compete with platforms while being required to meet audience universality in a context of reduced public funding. With the introduction of online business models, the news media sector is facing acute problems of monetisation, as many consumers lack the willingness to pay for news any longer, and advertising revenues have migrated to the Internet with the spectacular growth of programmatic ad spend.

A rapidly evolving legislative framework: The pace of change is quickening, and a stream of new technologies and applications might profoundly affect human behaviour as well as the media sector. It soon became clear that the framework of the Audiovisual Media Services Directive, which is still being deployed in candidate countries, would not be sufficient to tackle some of the challenges brought about by this quick-paced digital disruption. While the transposition of the AVMSD was considerably delayed, several legal provisions, such as the obligation for video-sharing platforms as set out in Article 28b, have proven difficult to implement in practice in some EU member States.

In parallel, there has been an unprecedented acceleration of ambitious regulatory initiatives, both at national and European level, with the aim to meaningfully impact and contribute to media and platform regulation. All these initiatives affect media regulators.

- The [Digital Services Act](#), fully applicable as of 17 February 2024 in the EU, addresses the issue of online harms at a large scale with targeted requirements for major large online platforms and search engines designated as such by the EU Commission. The process of implementation and enforcement is already gaining momentum with the opening of the first formal infringement proceedings in December 2023.

- Several countries, both EU and non-EU, have enacted (or are envisaging enacting) regulatory frameworks applicable to online platforms to prevent the spread of illegal or harmful content. These initiatives broaden the scope of competences of media regulators, but also fuel discussions on the potential fragmentation and applicability of the overall legal framework, particularly as EU-wide harmonisation continues to progress.
- In parallel, the [Digital Markets Act](#) (DMA) is expected to tackle the economic power of large online platforms and reach contestability and fairness in digital markets. The gatekeepers had six months from the date of their designation to comply with the new obligations, until 6 March 2024.
- Amid concerns about the dangers posed by information manipulation and foreign interference in elections, the issue of the transparency and targeting of political advertising is also being addressed by a [draft Regulation of the EU](#).
- Tackling information manipulation and bias will also imply understanding, regulating Artificial Intelligence and making an appropriate use of AI-based tools, which are increasingly prevalent in our communication channels and media. The [AI Act](#) aims to ensure the safety and fundamental rights' compliance of AI systems placed on the European market and used in the EU.
- The multiple crises have also reminded public authorities of how crucial media freedom and plurality are to ensure a trustworthy and viable media environment that is conducive to democracy. The [European Media Freedom Act](#) (EMFA) aims to establish a common, principle-based framework to better protect editorial independence, media pluralism, ensure transparency and fairness and bring better cooperation of media regulatory authorities through a new European Board for Media Services which will replace ERGA.

Future Challenges

Challenges for NRAs

Due to the significant changes in the media landscape, two general challenges for EPRA Members will be to keep up to speed with the technological developments shaping the media and information sector and to implement the complex legislative framework in a meaningful manner. More specifically, EPRA Members will have to deal with many external and internal challenges over the next three years:

External Challenges: A challenging media environment to regulate

A safe and sustainable online environment: Contributing to an effective systemic regulation of online platforms and social media with the aim to protect users, and especially children, against online harm through the implementation of national and/or European regimes. This includes contributing to the fight against disinformation and safeguarding news integrity. The rapidly growing digital industry has also raised the issue of the significant ecological impact of the sector and ensuring a safe media environment might also imply that regulators play a role in the process of greening the media industry.

A thriving and trustworthy media and information sector: Contributing to a viable media ecosystem for the delivery of content of democratic, social and cultural relevance to national and European audiences in a time of crises and polarisation. This is particularly relevant for public service media, local and community media providers. Media regulators play a key role to support the delivery of public interest and trustworthy content in a digital environment.

Effective, structured cooperation and relationships: Ensuring the effective implementation of the different regulatory frameworks established by the AVMSD, the DSA and the EMFA through reinforced cooperation between media regulators and other sectoral NRAs with the establishment of complex processes, strategies and multiple governance structures. The existing heterogeneity between different NRAs in Europe, in terms of size and powers, is likely to increase. The cooperation with non-EU NRAs and regulators from EU candidate countries will remain essential to ensure effective implementation and enforcement.

Internal Challenges: A demanding quest for sustainability

Well-resourced, informed media regulators: Securing an adequate level of resources (in terms of funding, staff, skills, training and tools) and changing mindsets, to fulfil their expanding tasks in a satisfactory manner, to tackle the growing complexity of the online media ecosystem, to cooperate effectively with other regulators, expert organisations and stakeholders, to grasp the complex interplay between the various legal instruments at national and European level and to understand the implications for the media sector and support evidence-based regulation.

Independent, transparent and accountable regulators: Fostering a real culture of independence – at arm’s length from both political and market forces – to support the independence of media players under their jurisdiction. The implementation of EMFA, and the geopolitical crises, makes this more relevant than ever.

Challenges for EPRA

The challenges for EPRA as a network arising over the next three years that this strategy aims to address:

Providing support to Members

Adding value: EPRA needs to continue to support its Members in responding and adapting to change in the media sector in ways that are relevant, future-oriented and complementary to other networks. EPRA needs to be innovative and ambitious, and yet realistic, in its approach and activities in order to add value both for its Members and for other participants in the wider European media field, in times of continuous change.

Securing sustainability

Remaining informal, neutral and independent: It is crucial to make sure that EPRA's values of independence, neutrality and informality are well understood and accepted by Members and stakeholders. This is especially important in a context of polarisation and multiple crises.

Strengthening resources: In times of change, EPRA Members experience increasing pressures on their resources (time, personnel and finance), with the need to prioritise. To make EPRA useful for its Members, however, Members' contributions are crucial. EPRA will endeavour to harness the ability of its Members to actively participate in and contribute to the activities of the network. EPRA should also reflect on how best to make use of the limited Board and Secretariat resources to contribute to the most important delivery of EPRA's strategic objectives.

Strengthening cooperation

Fostering cooperation by bridging the differences: The implementation of online regulation is likely to exacerbate the differences between EPRA Members. EPRA should endeavour to foster further meaningful cooperation, build bridges, and offer a safe space for informal exchanges between a set of very diverse media regulators from the European Union, non-EU jurisdictions, and those aspiring for EU Membership. EPRA should endeavour to enhance the collaboration with ERGA, the European Board for Media Services and other relevant stakeholders.

2. Vision, mission and values

Vision

The European Platform of Regulatory Authorities (EPRA) promotes freedom of expression as well as a pluralistic, sustainable and culturally diverse, media environment through its support for independent, professional and effective regulation of the media.

Mission

EPRA provides an independent, collaborative and transparent forum for media regulators. EPRA aims to facilitate the sharing of relevant information, best practice, experience and expertise, and the learning about new developments affecting the media, the information ecosystem and regulation. EPRA explores innovative means of regulating and analysing the media sector and of empowering audiences.

Values

EPRA is operating based on three core values that have been developed and reinforced over many years. These values are more important than ever in a time of crises and growing polarisation.

- **Independence:** EPRA is strictly neutral, non-political and impartial in its approach and operations. EPRA respects the independence of its Members.
- **Informality:** informality characterises EPRA's deliberations and interactions and facilitates a safe, free-flowing discourse and the exchange of a frank and diverse set of views, contributing to a sense of community amongst Members. EPRA believes that informal engagement contributes to its Members' understanding of each other's history, culture and traditions.
- **Collaboration:** EPRA builds strong internal and external links, both formal and informal. EPRA stays connected with its membership and other networks, the media industry, governmental and non-governmental organisations, academia, and sectoral interest groups.





3. Strategic objectives



Accompanying Members through the challenges of the changing media landscape

The rapidly evolving media market has introduced new types of services, user experiences and societal risks, necessitating a dynamic and informed regulatory approach to effectively navigate and shape this transformed landscape. EPRA intends to facilitate the collaboration and sharing of best practices and knowledge among its Members while providing inspiration and guidance to help Members cope with the changing media landscape especially in times of crises.

Intermediate goals:





-  *Keeping Members informed about major developments in the regulatory field and within the network.*
-  *Helping Members understand the changing media landscape and the legal regulatory framework.*
-  *Facilitating access to and sharing of insightful and comparative data on media regulation and regulators.*
-  *Facilitating and encouraging Members to share best practices and relevant inputs within the network.*



Interacting with external stakeholders to create valuable and practical insights

One of EPRA's "raison d'être" is connecting people from various professional environments within the media sector, to develop and share insights, and to facilitate discussions and exchange of experiences for the sake of the Members. To achieve this, EPRA will initiate relationships and cooperation with other relevant networks, the media industry, governmental and non-governmental organisations, academia, and interest groups within the media sector.

Intermediate goals:

-  *Bringing top experts and representatives from the media industry into EPRA meetings and events.*
-  *Developing/strengthening cooperation with relevant external partners.*
-  *Developing the cooperation processes with ERGA and establishing a relationship with the coming European Board for Media Services.*
-  *Assuring external visibility and representation of EPRA at relevant events, conferences etc.*



Securing a sustainable organisation

To serve its Members, and to deliver on its mission, values, and strategic objectives, EPRA must ensure that it has appropriate and sufficient resources with regard to staffing, funding, strong and transparent corporate governance and board membership. Securing a sustainable organisation also means an active commitment from the Board to involve Members in decision-making processes and activities within the network. Finally, securing a sustainable organisation means placing environmental sustainability as a value to our collaborations at all levels.

Intermediate goals:



Identifying resource requirements and setting priorities for optimum use of the resources and functioning of EPRA and exploring additional appropriate avenues for funding.





Developing procedures and processes that facilitate and motivate Members' engagement within the network, to meet and interact online and in person.



Increasing the sustainability of EPRA through the embedding of sustainability goals and targets into all aspects of our work.

STRATEGIC OBJECTIVE	INTERMEDIATE GOALS	KEY ACTIONS/DELIVERABLES
<div data-bbox="219 263 371 427" data-label="Image"> </div> <p data-bbox="203 451 560 600">Accompanying Members through the challenges of the changing media landscape</p> <p data-bbox="203 724 548 860">= facilitate the collaboration and sharing of best practices and knowledge among its Members</p> <p data-bbox="203 904 530 1075">= providing inspiration and guidance to help Members cope with the changing media landscape especially in times of crises</p>	<ul style="list-style-type: none"> <li data-bbox="584 308 987 472">● <i>Keeping Members informed about major developments in the regulatory field and within the network</i> <li data-bbox="584 520 987 687">● <i>Helping Members understand the changing media landscape and the legal regulatory framework</i> <li data-bbox="584 735 987 903">● <i>Facilitating access to and sharing of insightful and comparative data on media regulation and regulators</i> <li data-bbox="584 951 987 1118">● <i>Encouraging Members to share best practices and relevant inputs within the network</i> 	<p data-bbox="1014 276 1464 308"><u>General actions across the 3 years:</u></p> <ul style="list-style-type: none"> <li data-bbox="1014 352 2119 427">●● Select future-oriented Work Programme themes, topics and approaches related to the changing media landscape and the legal framework <li data-bbox="1014 472 2119 504">● Reflect on crises in the media sector when addressing the Work Programme topics <li data-bbox="1014 549 2119 624">●● Exchange and/or work with inspiring and future-oriented speakers, experts, technologists, and regulatory specialists <li data-bbox="1014 668 2119 743">●● Conduct surveys among EPRA members to understand their needs, challenges, and interests and map their competences/actions <li data-bbox="1014 788 2119 863">●●● Develop a varied range of knowledge-building outputs and promote inspiring outputs from project partners <p data-bbox="1014 994 1447 1026"><u>Deliverables (in order of priority):</u></p> <ul style="list-style-type: none"> <li data-bbox="1014 1070 2119 1145">●● Develop, systematise and make accessible to Members a list of relevant experts within the EPRA network on selected topics/areas <li data-bbox="1014 1190 2119 1265">●●● Revive the VSP & Regulators online Workshops and strengthen EMIL and the AI & Regulators roundtables <li data-bbox="1014 1310 1812 1342">●● Facilitate peer support projects among network Members

STRATEGIC OBJECTIVE	INTERMEDIATE GOALS	KEY ACTIONS/DELIVERABLES
 <p>Interacting with external stakeholders to create valuable and practical insights</p> <p>= Initiate relationships and cooperation with other relevant networks, the media industry, governmental and non-governmental organisations, academia, and interest groups within the media sector</p>	<ul style="list-style-type: none"> ● <i>Bringing top experts and representatives from the media industry into EPRA meetings and events</i> ● <i>Developing / strengthening cooperation with relevant external partners</i> ● <i>Developing the cooperation processes with ERGA and establishing a relationship with the coming European Board for Media Services</i> ● <i>Assuring external visibility and representation of EPRA at relevant events, conferences etc.</i> 	<p><u>General actions across the 3 years:</u></p> <ul style="list-style-type: none"> ● Invite more representatives of industry to meetings ● Develop partnerships and/or initiatives with other networks of media regulators, regulators from other relevant sectors, and academia ● Improve the visibility of Member participation in events and EPRA representation in events and conferences ● Ensure regular EPRA-ERGA Board-to-Board meetings <p><u>Deliverables (in order of priority):</u></p> <ul style="list-style-type: none"> ● Develop, systematise and make accessible to EPRA Members a list of relevant external experts on specific themes ● Modernize and improve user-friendliness of the website ● Ensure relevant social media presence

STRATEGIC OBJECTIVE	INTERMEDIATE GOALS	KEY ACTIONS/DELIVERABLES
 <p>Securing a sustainable organisation</p> <p>= appropriate & sufficient resources regarding staffing, funding</p> <p>= strong and transparent corporate governance and board membership</p> <p>= active commitment from the Board to involve Members in decision-making processes, and activities within the network</p> <p>= placing environmental sustainability as a value to our collaborations at all levels</p>	<ul style="list-style-type: none"> ● <i>Identifying resource requirements and setting priorities for optimum use of the resources and functioning of EPRA and exploring additional appropriate avenues for funding</i> ● <i>Developing procedures and processes that facilitate and motivate Members' engagement within the network, to meet and interact online and in person</i> ● <i>Increasing the sustainability of EPRA through the embedding of sustainability goals and targets into all aspects of our work</i> 	<p><u>General actions across the 3 years:</u></p> <ul style="list-style-type: none"> ● Ensure that neutrality and independence are guiding principles for EPRA's activities and are adequately guaranteed by its internal rules and procedures ● Consider environmental sustainability in our ways of working and within our meetings in cooperation with the hosts ● Identify and encourage future meeting hosts ● Provide information on the role and expectations of Executive Board members and encourage an informed, diverse and representative Executive Board <p><u>Deliverables (in order of priority):</u></p> <ul style="list-style-type: none"> ● Redevelop the website to increase opportunities for interactive exchanges between Members ● Time and resource management: establish clear annual priorities for the Board and Secretariat ● Introduce medium-term budget analysis and planning ● Develop, propose and conduct specific online training for "content producers" ● Review existing strategy; prepare and consult on new EPRA strategy (year 3)

Annex 2: Strategy review and measuring performance

Commitment to Review

EPRA commits to assessing the implementation of its strategy in the final six months of the strategy period. A key element is consulting with Members to assess EPRA's performance.

EPRA commits to revisiting its current strategy, in whole or in part, within the strategy period, should external circumstances change and should such a review be deemed appropriate. This would be done in a way that is transparent and comprehensible to the EPRA members.

Measuring EPRA's Performance

EPRA commits to taking measures to assess its performance. In measuring its performance against the strategy, EPRA will endeavour to answer the following questions:

- **Vision:** has EPRA adequately pursued its Vision, as set out in the Strategy Statement?
- **Mission:** has EPRA's Mission been reflected in practice? Has it provided direction for the organisation and guided its strategic decisions?
- **Values:** have EPRA's Values been reflected in its day-to-day conduct and been a guiding light in decision-making for the organisation?
- **Achievement of Goals and Objectives:** to which extent has EPRA achieved its goals and objectives? What have been the highlights over the period of the strategy? What does EPRA need to work on and what could it do better over the next strategy period?