

# The EU Media Wallet Policy Report

**Europaeum Scholars Programme** 

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# **Recommended citation**

De Naeyer, B., Juga, T., Konsbruck, Z., McGilligan, S., Myftari, K., Poselużna, I., Şahin, Ö., and Thurgood, D. The EU Media Wallet: Policy Report. Europaeum Scholars Programme, August 2025.

# Methodology

This report informs its analysis and recommendations from a review of official EUR-LEX documents, policy reports and academic literature, existing initiatives in the field, and 12 interviews with experts in journalism, publishing, academia, the civil service, NGOs, and funding bodies.

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# 1. Executive Summary

**INFORMED CITIZENS** are the backbone of democratic resilience. However, the rapidly evolving digital landscape has transformed the way information is shared, amplifying the spread of **disinformation** that undermines the foundation of European democracies and jeopardises their national security.

This new environment has triggered **structural** challenges in the news sector, such as economic **instability**, causing a decline in journalistic independence and in media pluralism. Our current attention economy has distorted our information space, where quality news has become scarce. This has impeded multiple stakeholders in different ways. (Figure 1)

Overcoming these challenges requires an EU-level structural, innovative solution. Existing EU initiatives boost media freedom but scaling them up has proven difficult. To complement the multiple EU innovations, we propose the creation of an online platform, called the EU Media Wallet. This multilingual pan-EU platform will provide EU residents access to high-quality independent journalism on a pay-per-article basis. With young adults most likely to disconnect from news outlets, the EU Media Wallet will include a separate feature only available for younger audiences, called the Youth News Pass. This pass grants EU citizens aged 18 to 24 free access to a selection of news content.

Our policy project aims to strengthen European democratic resilience by tackling the various concerns of the stakeholders outlined in Figure 2.

Our project builds on existing EU commitments to counter disinformation, safeguard electoral integrity, and support independent journalism. The project costs are eligible for the most common funding schemes of the EU (e.g., EC Action Plans, Creative Europe).

# Challenges

Figure 1

#### A DIGITAL INFORMATION **INFRASTRUCTURE**

where engagement is prioritized over quality.

#### **NEWS OUTLETS**

are deprived of reader traffic and revenue streams, surviving on lifeline philanthropy and public (EU) funding.

#### **NEWS CONSUMERS**

struggle to access quality news content

#### **YOUNG ADULTS**

are particularly negatively affected because they are

#### **Solutions**

Figure 2

#### A DIGITAL **INFORMATION INFRA-STRUCTURE**

that directly connects outlets with consumers and prioritizes content quality over engagement.

#### **NEWS OUTLETS**

exposure, extra revenue through pay-per-article basis from readers hesitant to pay for subscriptions, and outreach to younger

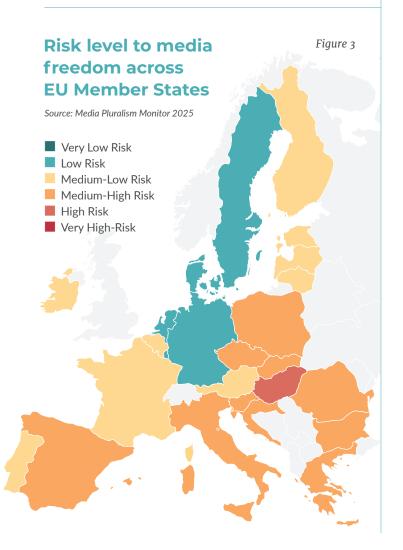
#### **NEWS CONSUMERS**

diverse eligible news

#### **YOUNG ADULTS**

News Pass.

# 2. The threat of disinformation to democracies



**DISINFORMATION** poses one of the greatest threats to European democracies and their national security and requires "swift and decisive action at both European and national levels". The EU Code of Conduct on Disinformation defines it as "verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm".

Recent elections across the EU have shown how disinformation can distort public discourse, influence voter perceptions, and undermine confidence in democratic outcomes. The EU has repeatedly acknowledged that protecting electoral integrity depends on maintaining a strong and independent media environment. Yet the current crisis is not just about the **spread** of disinformation, but also the collapse in trust in information sources, with trust in news media decreasing by 13% between 2020 and 2024.

The EU has recognised that building democratic resilience requires a robust information environment and a strong presence of quality journalism. However, news outlets in Europe have struggled to remain financially sustainable. As local newsrooms shrink and even disappear, the result is a decline in civic knowledge and participation. Without independent media, countries <u>risk</u> losing a pillar of their democracy and a key defence against disinformation and polarisation.



# Two strategies commonly tackle disinformation:

those which respond to specific risks like fact-checking, debunking, and content moderation, and those which focus on innovation in the information landscape. The former are necessary but **insufficient** on their own since false narratives and new malicious actors continually re-emerge in different forms.

#### CONTEXT

**COMPOUNDING THE PROBLEM**, the news sector faces financial precarity that threatens their ability to provide quality content. This is due to two main structural pressures on their revenues.

The first is **advertising revenues shifting from** news outlets to dominant online platforms. Newsrooms struggle to adapt their business model to the digital realm. In the past 20 years, profits have plummeted, and the trend shows no sign of reversing. (Figures 4 and 5)

Under the status quo, news outlets are overly dependent on third-party online platforms to reach their audiences. As a Senior Policy Expert at the EU Disinfo Lab said:

# "You survive from clicks and if you don't get the clicks vou don't survive."

The second structural pressure is a lack of subscriptions and readership, especially among **the youth**. This age group is the least likely to engage regularly with high-quality journalism: 44% of 18-24-year-olds rely primarily on social media such as TikTok, Instagram, and YouTube for news, where content is driven by engagement algorithms rather than editorial oversight, and where accurate information competes with entertainment, clickbait, and misinformation.

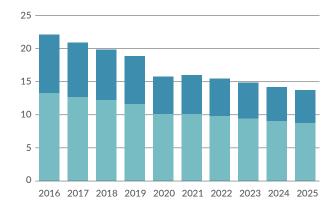
News outlets are losing revenues

Source: PPMI, KEA and Oliver & Ohlbaum Associates, The competitiveness and economic viability of the news media sector in the EU, using internal estimates and data from PwC, Global Entertainment and Media Outlook: 2021-2025.

■ Circulation ■ Advertising

#### **Print news sector revenues**

Figure 4



#### Digital news sector revenues

Figure 5

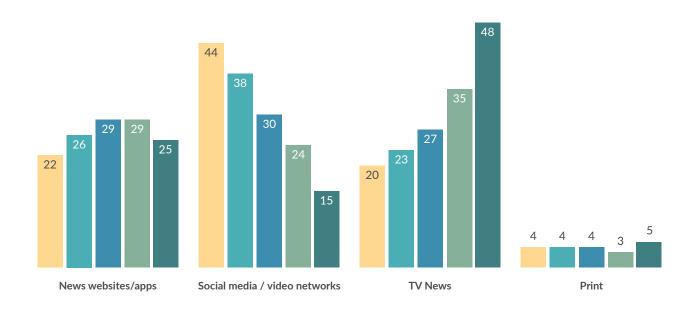
2016 2017 2018 2019 2020 2021 2022 2023 2024 2025



# Main news source by age group – Digital News Report 2025 Figure 6



Young adults consume less news



**YOUNG ADULTS ARE ALSO** the least capable of affording news subscriptions, even though this is a **critical age** for forming media habits and engaging in informed civic participation, a crucial element of democratic institutions. According to a Senior Policy Director at the media outlet Schibsted, there is strong interest from young social media users in the news, but paywalls and sign-up processes prevent them from accessing news content.





# 3. Existing Initiatives + Policy Gap

# 3.1 The Policy Gap in the EU Context

There have been multiple **EU grants** to promote transnational cooperation of independent news; what is needed to complement this is an EU initiative that builds the information infrastructure in which these outlets operate. This is the crucial step in helping news organisations develop a long-term strategy for resilient business models, and further still, one that enables financial independence from public funds.

The European Commission-funded initiatives – such as the Media Ownership Monitor or Media Councils in the Digital Era – focus primarily on expert networks and regulatory bodies. Instead, we aim to foster public participation across the EU through a citizen-oriented approach on one transnational platform.

Several ongoing flagship EU policy frameworks, such as the European Democracy Action Plan (EDAP) explicitly promote building democratic resilience against threats to the electoral process through pilot projects, but their techniques place less emphasis on media freedom. In response to this call, the Media Wallet we propose directly advances EDAP-priorities by addressing the challenges of disinformation and promoting youth engagement in democratic life. Moreover, this boosts the European Youth Goal no. 4 "Information and Constructive Dialogue" of the EU Youth Strategy 2019-2027, where initiatives have not adequately considered information ecosystems themselves thus far. Supporting our initiative will represent a meaningful evolution in the Commission's approach to media engagement and democratic innovation.

Diverse EU initiatives promote media literacy, with some even targeting youth in particular. However, these often support a didactic approach where the campaigns provide the information for users to learn, rather than the experiential process our project encourages by giving the tool to the user.

Those which do offer a **toolkit** place less emphasis on connecting users directly to news organisations. Some recent initiatives have moved towards linking young users and more regional outlets. However, these focus only on specific youth groups and news outlets, which limits the scope for both age demographics and geographic focus.

# **Initiatives, Their Features & Areas of Impact**

Figure 7

Previous initiatives	Promoting Business Sustainability	Reaching Youth	Media Freedom and Pluralism	Media Literacy	Pan-EU Scope	Scalability of Initiative
Media Pluralism Monitor	<b>~</b>		~		~	<b>~</b>
Free Media East			<b>~</b>			
European Festival of Journalism and Media Information		~		~	~	
Perspectives 2	~	~	~	~		~
Media Innovation Europe	<b>~</b>	~	~	<b>~</b>		
European Digital Observatory			~		~	<b>~</b>
EU Media Wallet	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>

# 3.2 Relevant EU strategic objectives

EU investment under DG CONNECT's Digital Europe Programme (DIGITAL) supports digital infrastructure for media pluralism, resilience, and democratic governance. Its cross-border, collaborative priority and focus on innovation in business models additionally aligns with the aims of initiatives of current EU funding instruments, such as those of the Multimedia Actions, Pilot Projects and Preparatory Actions of the European Parliament, and the Cross-Sector Strand of Creative Europe Programme.

DIGITAL offers opportunities for cooperation with key stakeholders such as the European Digital Media Observatory (EDMO) for disinformation monitoring and impact evaluation, and the European Parliament's LIBE Committee for direct pilot support in Member States. EDMO could be a crucial partner as the Commission plans to further consolidate its role in **combating disinformation** in Europe.





# **EU Media Wallet**

Our project, called the EU Media Wallet, furthers these objectives and aims to:

- ▶ Empower eligible **news outlets** across all Member States to connect directly with audiences, fostering trust, participation, and democratic resilience.
- Ensure **financial sustainability**, as it provides the architecture for an additional revenue stream for news media organisations, supporting long-term viability.
- ▶ Increase **young adults' interaction** with independent news outlets and enhance their media literacy skills, reinforcing the EU's democratic pillar over the strategic horizon.

# 4. Recommendations



## 4.1 The EU Media Wallet

The **EU Media Wallet** is a multilingual pan-EU platform providing EU residents access to high-quality independent journalism on a pay-per-article basis.

# "As long as you make good content, people will find it."

- An expert on British journalism -

# 4.1.1 How does the EU Media Wallet platform work?

Eligible news outlets determine the type, volume and prices of the content they make accessible through the EU Media Wallet. Users access this news on a pay-per-article basis. This overcomes the technical <u>frustration</u> associated with requiring individual user accounts for each media outlet. The EU Media Wallet does not replace the subscription model. Instead, it lets outlets earn revenue from readers willing to

pay for individual articles without committing to a full subscription.

The EU Media Wallet would be designed to exclusively display content from independent and verified news media organisations (see section 4.1.3) and provide an alternative to social media, where algorithms amplify sensationalist content and make it difficult for users to access accurate information.

Based on current media usage trends, the platform would feature news content in text, video and podcast format. By placing these formats on one unified application, we ensure that the EU Media Wallet aligns with current audience behaviour, particularly for young people. Since users read the article on the outlet's site, it will display ads and let sponsors reach a wider audience. News outlets are required to pay a **commission fee** on each article purchased. The commission percentage is progressive to the revenue of the outlet (see section 4.3).

# 4.1.2 News Pass for young audiences

The **EU Media Wallet** platform includes a separate feature only available for younger audiences, called the **Youth News Pass**. This pass grants EU citizens aged 18 to 24 free access to a selection of news content. By making high-quality journalism accessible at a **formative** stage in life, the EU can support the development of healthy long-term media habits, promote exposure to a broader range of perspectives, strengthen media literacy, and foster greater trust in the media and political institutions. The Youth News Pass supports the **EU Youth Strategy's** aim of engaging young people to be active in society and complements existing **EU** youth programmes such as DiscoverEU and Erasmus+, which have strengthened European identity and participation by removing barriers to travel and education. The Youth News Pass follows the same principle: ensuring that **young** adults have a pathway to access high-quality news irrespective of their economic circumstances.

Eligible outlets decide which content and how much to offer for free through the Youth News Pass. Young adults may buy additional content available only via the pay-per-article system.

The ages between 18 and 24 are crucial for habit formation and establishing brand loyalties and therefore the Youth News Pass represents a long-term investment. This gives smaller outlets a chance to learn about young audiences and promote content to attract **future paying readers**. As 18-24-yearolds now pay little or nothing for news, offering free access through the Youth News Pass would not cause significant revenue loss. Recent EU projects have sought to make quality news online available to youth readership. To boost the impact of these initiatives, this policy focuses on creating good habits for young users by bringing them together with independent media outlets on one pan-EU platform.

We propose to pilot the Media Wallet first so that it can be evaluated before expansion. The results will inform a potential decision to **scale up, replicate**, or **conclude** the initiative – ensuring that any future expansion is grounded in evidence-based assessment (see section 4.2.).

## **4.1.3 Eligibility of News Providers**

News outlets applying to the EU Media Wallet must meet pre-set conditions to ensure content quality and editorial independence. These criteria are based on similar requirements found in EU legislation, such as Article 18 of the European Media Freedom Act (EMFA), and in ongoing EU funding calls, such as that for European Media Hubs.

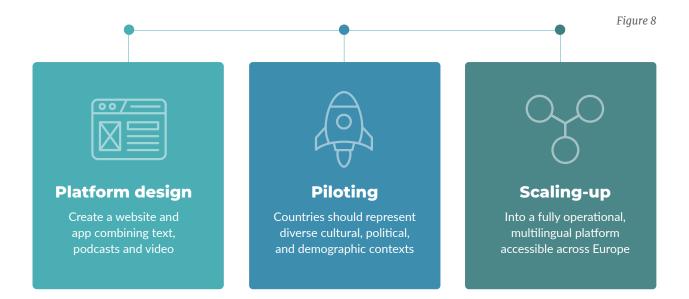
# **Eligibility Criteria:**

- 1. Be a media service provider (Article 2(2) EMFA).
- **2.** Have made journalistic content available to the general public for at least one year
  - **a.** No B2B-journalism
  - **b.** No Al-generated content without human editorial review (Article 18(1)(e) EMFA).
  - **3.** Be editorially independent (Article 18(1)(c) EMFA).
  - **4.** Be subject to regulatory requirements and oversight regarding editorial responsibility (Article 18(1)(d) EMFA).

# **News media outlets** excluded from the **EU Media Wallet:**

- **1.** EU-banned Russian disinformation outlets (see full list here).
- **2.** EU-restricted entities
  - **a.** Currently, restriction measures apply to certain Hungarian entities under Council Implementing Decision 2022/2506 (see full list of impacted entities here).





# 4.2. Implementation: The EU Media Wallet in practice

We propose a three-phased implementation of the multilingual EU Media Wallet.

After designing the platform, which involves a website and a mobile application, we propose piloting our platform in several diverse regions and, if successful, scale it up across the EU.

# 4.2.1 First phase: Platform design for the EU Media Wallet

A priority in the platform design is to give users fast and convenient access to a broad spectrum of quality news, thereby strengthening the position of news organisations of all sizes, from regional to the national.

Each eligible news organisation could create a publisher profile on the platform. News articles, videos, and podcasts published on their own web domain/ app would be mirrored on the platform via APIs similar to how news organisations currently distribute content on social media. The participating media organisations would be encouraged to publish content that is in line with the aims of the **The European** Accessibility Act, e.g., combining both written and audio content, so individuals with disabilities could also access the publications on the platform.

Citizens can access the EU Media Wallet by creating an account on the platform or, if integrated, by logging in through their EU Digital ID. Elibility for the Youth News Pass is verified through a secure and privacy-preserving age verification system.

> Participating news outlets would **decide which content** to share through the EU Media Wallet. All content must comply with the Press and Media Councils' ethical codes.

As these organisations already meet strict eligibility criteria, no additional restrictions on the type of content would be imposed.

- Individual users would not be able to publish content themselves, only the participating news outlets.
- ► The platform will **not** feature an interactive interface to avoid intermediary liability. This means users will not be able to react or comment on the platform.

# Core design principles

The platform will be designed in line with fairness, transparency and privacy preservation and provide visibility of all participating outlets to promote diverse perspectives.

User experience can be personalised through optional filters:

- Selecting geographic areas;
- Selecting language preferences;
- ▶ Selecting **themes** of interest.

# 4.2.2 Second phase: Setting up the pilot programme

We recommend piloting the platform in several countries to test feasibility and to collect data for scaling the **EU Media Wallet** to a truly pan-EU, multilingual initiative. These countries should reflect a broad spectrum of cultural, political, and demographic contexts, providing a robust foundation to test the platform's adaptability and relevance.

We recommend selecting pilot areas based on the following criteria:

- ▶ Areas with **low news engagement among** young adults;
- Cultural, political and regional variety;
- **▶ Linguistic** diversity;
- ▶ Areas with different levels of **media pluralism**.

# 4.2.3 Third phase: EU-wide roll-out

Once the pilot is successful, the EU Media Wallet can be scaled into a fully operational, multilingual platform accessible across the EU and invest more resources in outreach campaigns. This can happen gradually, integrating insights regarding the optimisation of user experience (UX).



# 4.3 Funding

#### **4.3.1 Costs**

The cost estimations are calculated based on the expenses of companies in comparable industries and earlier public-funded projects with available financial statements and funding information. For the services that will be outsourced, the publicly-available pricing information of well-known service providers are used.

The initial pilot project is estimated to cost €195,000 to launch both a website and a mobile app, including €35,000 for initial marketing and reach. Each additional region, with legal and technical localisation expenses, is estimated to cost approximately €63,000. Because the platform is designed with modular regional onboarding, marginal expansion costs might decrease over time, allowing for increasingly efficient scaling after the initial regional deployments. Funding the **EU Media Wallet** aligns well with the wider EU Strategic goals such as promoting high-quality media, transnational policy cooperation, orientated around principles of media freedom, pluralism, and business innovation.

On top of these initial costs to create the platform and deploy it in different regions, each year, €237,000 worth of operational costs - recurring maintenance, updates, staff, marketing and performance analysis costs - are estimated.

As expected, after the initial set-up of the platform, the majority of the cost is the staff salaries yearly. For instance, €200,000 of the €237,000 maintenance costs is the salary of staff, calculated for four employees, expected to consist of a project manager, software developer, public/local partnership engagement officer and a legal compliance officer.

Based on these numbers, below is a table of potential scenarios.

Where feasible, the project might opt for opensource alternatives or cheaper alternatives that become available down the line. In the long run, the platform might consider revenue sharing schemes with the media outlets to cover its recurring costs.

PROVISIONAL COSTS - SCENARIO	COST (€1,000s)
Launching only mobile app with marketing in one region	140
Launching only website app with marketing in one region	120
Launching both website and app with marketing in one region	195
Expanding to 1 additional region	63
Maintenance of the website and the app for 1 additional year with recurring marketing	237
Launching both website and app with marketing in one region + Expanding to one additional region	258
Launching both website and app with marketing in one region + Expanding to two additional regions	321
Launching both website and app with marketing in one region + Expanding to one additional region + 1 year maintenance	495
Launching both website and app with marketing in one region + Expanding to two additional region + 2 year maintenance	796

Figure 9 | Costs Expressed in 2025 Terms

# 4.3.2 Funding and Revenue Streams

The **EU Media Wallet** policy proposal requires EU funding at the start. Currently spending €50 million a year on support for news organisations and expected to spend more, the European Union has consistently funded projects supporting news organisations and independent journalism through different instruments, two of the largest streams being the CreativeEurope EU Programme, and the Multimedia Action Plan of the EC (see Figure 10).

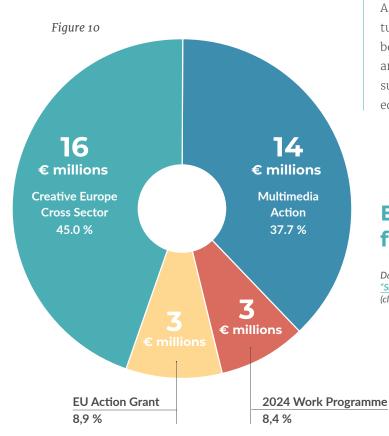
The transnational cooperative scope of this policy project makes the EU Media Wallet suitable to multiple potential EU funding instruments. These include the European Commission Work or Action Programmes (e.g. Multimedia Actions of the EC), Pilot Projects and the Preparatory Actions line of the European Parliament, or the "Cross-Sector" strand of the Creative Europe Programme in tandem with local partners and collaborations. This fund is to launch the programme and cover the costs of initial expansion and recurring costs of the first years.

The provisional costs of the EU Media Wallet project comfortably fall within the amounts granted under the Creative Europe Programme, and are less than the funds awarded by the EC under Work or Action programmes.

The EU Media Wallet is also well positioned for a 2025-2027 pilot under the Digital Europe Work Programme, with potential funding in the 2028-2034 Multiannual Financial Framework through the proposed AgoraEU MEDIA+ strand. This aligns with strategic EU goals in the 2030 Digital Compass and **the Path to the Digital Decade** policy programme.

The EU Media Wallet is designed to reach eventual self-sustainability through different revenue streams. Once the platform is well-established across markets with a user base and news outlets, commissions from the pay-per-view revenue of news outlets, as well as the commission from the subscription price and advertisement revenue of the referred page of the news content become available for the EU Media Wallet.

As the EU Media Wallet matures, multiple opportunities for revenue for a self-sustaining platform become available: the accumulated data, expertise, and know-how create chances for services in consultancy, training and market analytics to interested media outlets.



# **EU Funding Instruments** for News Support in 2025

Data from EU Calls for Proposals for topic: "Support for the News Media Sector" (closing date: 2025)



# 5. Conclusion

The shift to a digital public sphere has not only opened up access to public debate, but has also introduced new challenges. The traditional news sector faces economic instability, causing a decline in journalistic independence and in media pluralism. This has undermined the press' crucial role in holding our democratic institutions to account in an era when democratic participation is low. Concurrently, disinformation proliferates, undermining trust in both media and democratic institutions.

Several EU initiatives at the local level have boosted media freedom but scaling them up has proven difficult. Our proposed **EU Media Wallet** is a pan-European platform hosting quality journalism from media outlets complying with Article 18 EMFA. It benefits both the media outlets and news consumers. EU residents gain easier access to more quality and more diverse news. News organisations can supplement their current online subscription revenues with additional pay-per-article revenue by gaining new paying readers who would not commit to multiple subscriptions. It creates the infrastructure necessary to connect news outlets with its potential consumers more effectively, without the EU telling citizens who to trust or what to read, or directly cherry-picking which news outlets to fund.

The Youth News Pass targets the most precarious group of news consumers: young adults. It gives free access to news content to the demographic who are least able and willing to pay for it, and who are also the least likely to participate in civil society at a life-stage that greatly influences life habits.

Faced with the growing risk of disinformation that threatens the security of democratic institutions, the persistence of independent reporting is critical to emboldening trust in EU democratic processes. The EU Media Wallet provides an intervention that targets and strengthens the infrastructure of news organisations currently struggling to maintain their resilience in this rapidly evolving digital landscape. Crucially, it does so through one transnational platform that gives the tools directly to EU residents. By encouraging news consumption among young adults through the Youth News Pass, the EU Media Wallet both allows young adults to experience the significance of independent journalism on their own terms and boosts the long-term sustainability of media business models, where investigative, relevant, and accurate reporting is financially rewarded.

# References

Arnett, J. J. (2023). Emerging adulthood: The winding road from the late teens through the Twenties (3rd edition). Oxford University Press. https://academic-oup-com.ezproxyprd.bodleian.ox.ac.uk/book/55230

Bateman, J., & Jackson, D. (2024). Countering disinformation effectively: An evidence-based policy guide. Carnegie Endowment for International Peace. https://carnegieendowment.org/research/2024/01/countering-disinformation-effectively-an-evidence-based-policy-guide?lang=en

Berger, C., Freihse, C., & Meyer zu Schwabedissen, O. (2024). Effectively countering disinformation: Perspectives from every continent. In Bertelsmann Stiftung (Ed.), Research series: Reinhard Mohn Prize. Bertelsmann Stiftung. https://www.bertelsmann-stiftung.de/en/publications/publication/did/effectively-countering-disinformation-perspectives-from-every-continent

Bjornsgaard, K., & Dukić, S. (2023). The media and polarisation in Europe: Strategies for local practitioners to address problematic reporting. RAN External Experts. https:// home-affairs.ec.europa.eu/system/files/2023-05/ran\_the\_ media\_and\_polarisation\_052023\_en.pdf

Buschow, C., & Wellbrock, C.-M. (2019). Money for nothing and content for free? Willingness to pay for digital journalism. Landesanstalt für Medien NRW. https://nbn-resolving. org/urn:nbn:de:0168-ssoar-65275-7

Council of the European Union. 2018. Resolution of the Council of the European Union and the Representatives of the Governments of the Member States Meeting within the Council on a Framework for European Cooperation in the Youth Field: The European Union Youth Strategy 2019-2027. ST/14944/2018/INIT. OJ C 456. 18 December 2018. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex-%3A42018Y1218%2801%29

Council of the European Union. (2022, December 15). Council Implementing Decision (EU) 2022/2506 on measures for the protection of the Union budget against breaches of the principles of the rule of law in Hungary. Official Journal of the European Union, L 325, 17-30. http://data.europa.eu/ eli/dec\_impl/2022/2506/oj

Council of the European Union. (2025, July 18). EU sanctions against Russia. https://www.consilium.europa.eu/en/policies/ sanctions-against-russia

Edgerly, S. (2025). Developing the habit: The socialization of US teens into distinct repertoires of news consumption. Journal of Children and Media, 1–19. https://doi.org/10.10 80/17482798.2025.2504879

European Commission. (n.d.). European Digital Identity. Retrieved August 14, 2025, from https://commission.europa. eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/european-digital-identity\_en

European Commission. (2018, April 26). Tackling online disinformation: A European approach (COM/2018/236 final). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018DC0236

European Commission. (2020, December 3). On the European democracy action plan (COM/2020/790 final). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. https://eur-lex.europa. eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0790

European Commission. (2024, October 22). Call for proposals: Journalism partnerships - collaborations (2025). https:// digital-strategy.ec.europa.eu/en/funding/call-proposals-journalism-partnerships-collaborations-2025

European Commission. (2024, December 5). A European public sphere: A new online media offer for young Europeans (2024). https://digital-strategy.ec.europa.eu/en/funding/european-public-sphere-new-online-media-offer-young-europeans-2024

European Commission. (2024, December 5). Four media consortia selected to enrich pan-European debate among young Europeans. https://digital-strategy.ec.europa.eu/en/news/ four-media-consortia-selected-enrich-pan-european-debate-among-young-europeans

European Commission. (2025). Local campaign to fight disinformation with media literacy skills (EC-COMM/HEL/2025/ LVP/0351-EXA). EU Funding & Tenders Portal. https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/tender-details/3afce56b-2dbc-4395-ab6a-6bac0e 42743c-EXA?isExactMatch=true&status=31094503&order=-DESC&pageNumber=1&pageSize=10&sortBy=startDate

European Commission. (2025, February 13). The Code of Conduct on Disinformation. https://digital-strategy.ec.europa.eu/en/library/code-conduct-disinformation

European Commission. (2025, March 28). Annex to the Commission implementing decision on the financing of the Digital Europe Programme and the adoption of the multiannual work programme for 2025-2027 (C(2025) 1839 final). https://digital-strategy.ec.europa.eu/en/library/work-programme-2025-2027-digital-europe-programme-digital

European Commission. (2025, April 30). Call for Proposals: Pan-European Reporting. https://digital-strategy.ec.europa. eu/en/funding/pan-european-reporting

European Commission. (2025, July 16). Proposal for a regulation of the European Parliament and of the Council establishing the 'AgoraEU' programme for the period 2028-2034, and repealing Regulations (EU) 2021/692 and (EU) 2021/818 (COM/2025/550 final). https://eur-lex.europa.eu/ legal-content/EN/TXT/?uri=CELEX%3A52025PC0550&qid=1753799477044

European Commission. (2025, July 22). EU funding opportunities for the news media sector. https://digital-strategy.ec.europa.eu/en/policies/funding-news-media-sector#1720699867912-0

European Commission. (2025, July 31). European Digital Media Observatory - EDMO. https://digital-strategy.ec.europa. eu/en/policies/european-digital-media-observatory

European Commission. (2025, July 31). The news initiative - EU support for the news media sector. Retrieved August 14, 2025, from https://digital-strategy.ec.europa.eu/en/policies/news-initiative

European Commission. (2025, July 22). European Media Hubs. https://digital-strategy.ec.europa.eu/en/funding/european-media-hubs

European Commission. (2024, December 5). Four media consortia selected to enrich pan-European debate among young Europeans. https://digital-strategy.ec.europa.eu/en/news/ four-media-consortia-selected-enrich-pan-european-debate-among-young-europeans

European Commission. (2025, May 4). Make it clear - educating young people against disinformation online. https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/ opportunities/projects-details/43251814/101093190/ CREA2027?order=DESC&pageNumber=1&pageSize=10&sort-By=es\_SortDate&topicAbbreviation=CREA-CROSS-2022-ME-DIALITERACY

European Commission. (2025, May 4). Scale up MediaCoach. https://ec.europa.eu/info/funding-tenders/opportunities/portal/ screen/opportunities/projects-details/43251814/101093458/ CREA2027?order=DESC&pageNumber=1&pageSize=50&sort-By=title&keywords=local%20media%22&isExactMatch=true

European Foundation for the Improvement of Living and Working Conditions. (2025). Living and working in the EU e-survey. https://www.eurofound.europa.eu/en/surveys/living-and-working-eu-e-survey

European Parliament, & Council of the European Union. (2024). Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act) (Text with EEA relevance). Official Journal of the European Union, L 2024/1083. https://eur-lex.europa. eu/eli/reg/2024/1083/oj/eng

European Parliament, & Council of the European Union. (2019, April 17). Directive (EU) 2019/882 of the European Parliament and of the Council on the accessibility requirements for products and services (Text with EEA relevance). Official Journal of the European Union, L 151, 70–115. http:// data.europa.eu/eli/dir/2019/882/oj

European Parliament, & Council of the European Union. (2020, December 16). Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council on a general regime of conditionality for the protection of the Union budget. Official Journal of the European Union, L 433I, 1-10. http://data.europa.eu/eli/reg/2020/2092/oj

European Parliament: Directorate-General for Internal Policies of the Union, Botero Arcila, B., & Griffin, R. (2023). Social media platforms and challenges for democracy, rule of law and fundamental rights, European Parliament. https://data. europa.eu/doi/10.2861/672578

Euromedia Ownership Monitor. (n.d.). Euromedia Ownership Monitor. Retrieved August 14, 2025, from https://media-ownership.eu

Freelon D. and Wells, C. (2020). Disinformation as political communication. Political Communication 37(2), 145-156.

Hasen, R. I. (2022). Cheap speech: How disinformation poisons our politics - and how to cure it, New Haven: Yale University Press.

Jarvis, J. (2017, June 12). Our problem isn't "fake news." Our problems are trust and manipulation. Medium. https://medium.com/whither-news/our-problem-isnt-fake-news-ourproblems-are-trust-and-manipulation-5bfbcd716440

Media Defence. (2025, April). Content Restrictions and Intermediary Liability - Europe. Retrieved August 14, 2025, from https://www.mediadefence.org/resource-hub/content-restrictions-and-intermediary-liability-europe

Newman, N., Ross Arguedas, A., Robertson, C. T., Nielsen, R. K., & Fletcher, R. (2025). Digital news report 2025. Reuters Institute for the study of Journalism. https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital News-Report\_2025.pdf

PressCouncils.eu. (n.d.). What is self regulation? Retrieved August 14, 2025, from https://www.presscouncils.eu/ what-is-self-regulation



# **Acknowledgements**

This policy report was developed with funding from the Europaeum Scholars Programme, a two-year policy and leadership initiative. It brought us, an interdisciplinary group of doctoral candidates from seven European universities, together to work collaboratively on a European policy problem we believed required urgent action. Our group shared a common interest in disinformation and the media, yet we arrived in Brussels with very different visions of what that meant.

We were fortunate to hear from the brilliant and inspiring **Joe McNamee**, Senior Policy Expert at the **EU DisinfoLab**, in Brussels 2024. We are also grateful to the **twelve** policy **experts**, NGO representatives, civil servants, journalists, publishers, and academics we interviewed as we shaped our proposals: your insights were absolutely invaluable.

Special thanks to **Tracey Sowerby** for organising eight inspiring Europaeum modules, each of which helped us transform vague concepts into a final, concrete policy proposal, and for creating such a vibrant, welcoming environment where ideas could be exchanged over good food and a glass of wine. Thanks also to **Andrew Graham** for encouraging us to "think big", bringing an economic lens to our work, for his enthusiasm - and, most importantly, for the early morning swims in Geneva. We appreciate Sophie Vériter and Jonathan Brusseau's thoughtful input and feedback on our elevator pitch in Helsinki, which helped refine the final stages of this report.

Finally, our immense gratitude goes to Claudia Negri Ribalta, for moderating debates, keeping us on schedule, and playing the devil's advocate oh-so-well. The EU Media Wallet would have been a technical nightmare without your sharp, critical perspective.

