

## EBU Contribution to the 2023 Rule of Law Report Consultation 20 January 2023

The European Broadcasting Union (EBU) is the world's leading alliance of public service media (PSM) organizations. Our purposes include contributing to safeguarding and furthering the freedom of expression and information and enhancing media freedom and pluralism in the field of broadcasting. In 2022, in the area where EBU Members operate, we witnessed [an alarming deterioration of the freedom of expression and information as well as increasing violence against journalists](#). Any attempts to diminish media pluralism and weaken independent media in its essential role as watchdogs threaten the rule of law. The degree to which the EU ensures respect for the rule of law in Europe directly affects any policies and activities that promote media freedom and pluralism. We therefore support robust EU action to protect and promote the rule of law, including a genuine commitment to act against rule of law infringements.

In the process of preparing its annual Rule of Law Report, the European Commission holds regular dialogues with EU Member States' authorities. We support these bilateral dialogues between the Commission and Member States aimed at establishing tailored solutions to address political and/or economic interferences targeting PSM in some EU Member States. **It is also crucial that all relevant stakeholders be involved in the process of developing the country-specific recommendations.**

From March 2023, EU Member States will report to the Commission on the measures adopted following [its Recommendation of 2021 on the protection, safety and empowerment of journalists](#). While we welcomed this Recommendation, we reiterate that **the effective implementation by EU Member States of [the 2016 Council of Europe Recommendation on the protection of journalism and safety of journalists and other media actors](#) would further strengthen media freedom in Europe.**

Since Russia started a war against Ukraine, the EBU has strengthened its offer to journalists and other media professionals covering the war or reporting from authoritarian regimes of its [Hostile Environment Safety Training Refresher](#). The EBU and its Members [support the EBU Ukrainian Member](#), UA:PBC, in fulfilling its mission to provide the Ukrainian public with accurate, high-quality, verified and correctly sourced news.

The Audiovisual Media Services Directive (AVMSD) requires that national regulatory authorities and bodies be functionally independent from their respective governments and from any other public or private body. **This independence requirement -together with the [other EBU proposals](#) concerned - should be upheld, including in the proposed European Media Freedom Act sections dealing with the relationship between the Commission and the future European Board for Media Services.**

Finally, the [conclusions](#) of [the joint Council of Europe and EBU Conference organised last November](#) should advise any public policies aimed at promoting the independence of PSM and commitments for media freedom and the freedom of expression and information.