

EMMA and ENPA

Draft Position paper on the MEDIA+ strand of the AgoraEU Programme

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This paper presents the views of the European Newspaper Publishers' Association (ENPA) and the European Magazine Media Association (EMMA), representing publishers of digital and print newspapers and magazines across the European Union.

The press publishers represented by EMMA and ENPA welcome the proposed AgoraEU Programme and, in particular, the creation of a dedicated 'MEDIA+' strand supporting, inter alia, the press sector. **This represents an important step in translating the Union's political commitments to media freedom and pluralism into concrete and operational support mechanisms.**

The inclusion of the press within valuable support programmes like AgoraEU reflects the growing recognition at EU level that independent journalism and a pluralistic press ecosystem are indispensable to democratic resilience, informed public debate and social cohesion. In parallel, a regulatory framework allowing the press to sustain itself independently must remain a priority. The EU must avoid measures that directly or indirectly threaten media pluralism, undermine business models, restrict financing, or impose excessive burdens, including in data and consumer protection initiatives.

To fully deliver on its objectives, the design of the 'MEDIA+' strand must ensure clarity, fairness and structural balance between its different objectives, as well as broad and inclusive access for the European press sector in its entirety. Likewise, we believe that the budgetary amounts dedicated to the press and media must be increased.

I. The need for a clear and upfront separation of funding envelopes

A central concern for press publishers relates to the internal architecture of the 'MEDIA+' strand, which currently brings together audiovisual, cinema, videogames, and 'news'-related actions under a single umbrella. **To ensure fair access, legal certainty, and efficient planning, we propose two main reforms:**

1. Splitting 'MEDIA+' between press and audiovisual

Press publishers call for a prior and transparent allocation of the 'MEDIA+' budget between audiovisual, cinema and gaming projects on the one hand, and the press on the other. This should take the form of two distinct, watertight budget envelopes defined for the entire multiannual financial framework (MFF) period. **Such a separation would guarantee that press content and publishers**

receive a fair and predictable share of funding, avoid annual or ad hoc negotiations on internal budget distribution which create uncertainty and administrative burdens, and provide planning visibility for potential beneficiaries, particularly smaller and medium-sized press publishers with limited resources.

Without an upfront split, there is a structural risk that well-established audiovisual stakeholders could dominate the budget, to the detriment of the press sector. A clear, objective, and transparent allocation is therefore essential for the credibility and effectiveness of MEDIA+.

2. Moving paragraph 6(d) to CERV+

To further reinforce the principle of separating funding envelopes, paragraph 6(d) of MEDIA+, which addresses measures to safeguard the online information space, including anti-disinformation efforts, **should be relocated to the Democracy, Citizens, Equality, Rights and Values strand (CERV+), for example under Article 7 (rights, equality, citizens, and civil society).**

The objectives of safeguarding the online information space are consistent with the CERV+ strand as they address democratic and rule of law shortcomings rather than media financing. Furthermore, anti-disinformation initiatives are often carried out by civil society organisations aimed at promoting democratic resilience and EU values, such as those mentioned in Article 7(f). **Large-scale anti-disinformation initiatives are horizontal and civic in nature, so funding these actions under a specific envelope better reflects their purpose, governance, and societal role.** Lastly, these initiatives by their nature might satisfy the cross-border criterium more easily than press publishers (more on this below) and dominate the budget intended for the production and dissemination of editorial content, as defined in the proposal as “news”.

II. Improvements of the ‘News’ objective

1. Clarifying that “news” covers all press publications

Beyond budgetary considerations, the scope and terminology of the ‘News’ objective raise important issues. **The use of the term “news” creates ambiguity and risks discriminating between different editorial media offerings as to eligibility.** This contradicts the European Media Freedom Act (EMFA) objectives of fostering media pluralism and stands in contrast with the ‘Audiovisual’ objective, which encompasses a wide range of formats and editorial approaches without such distinctions. On the other hand, support under MEDIA+ must be limited to media services providers, as defined in Art. 2 EMFA, that publish media content under human review or editorial control and where a natural or legal person holds editorial responsibility for the publication of the content.

The MEDIA+ strand must be **explicitly open to all press publishers**, irrespective of format, editorial positioning, size or market reach. **We therefore call for replacing the term “news” with “press” or explicitly referring to “news media and press”.** In this regard however, in terms of promoting innovation in the media sector at large, AgoraEU must respect the goals and approach of the EMFA, and

Article 6(c) should not be used to finance projects that would distort competition between different media types.

At a minimum, the text must clearly establish that all editorial media are covered in a consistent and content-neutral manner, including both newspapers and magazine publishers. The press ecosystem is diverse by nature, and restricting access to a narrow understanding of “news” **could exclude a significant part of the sector that equally contributes to pluralism, democratic debate and media sustainability**. AgoraEU should support a broad and representative cross-section of the press sector, including local, regional and specialised titles, which are often the most exposed to economic vulnerability and instability yet play a crucial role in democratic life.

We understand that the Commission intended the term “news” to cover the broader information ecosystem, including both print and online publishing. This understanding is reflected in Recital 13, which states that “*the Union should support a viable, independent and diverse information ecosystem (...)*”, and in Recital 11, which explicitly refers to print and online publishing. While we support this approach, **explicit clarification in the operative part of the Regulation is necessary to ensure legal certainty for press publishers**.

2. Additional aspects

a. Editorial independence must be fully respected. Article 6(b) includes, among its objectives, the enhancement of the production, distribution and consumption of professional journalistic content, “*including coverage of Union affairs*”. Despite the explicit reference to safeguarding editorial independence, the attachment of public funding to specific topics or areas of coverage raises serious questions as to its compatibility with the fundamental principles of press and media freedom and editorial independence

Any media support mechanism, including EU funding programmes, must therefore be strictly content-neutral; failing this, there is a risk of interference. If support were to favour or disadvantage certain content, viewpoints, or editorial lines, it would amount to undue influence over editorial independence and media pluralism.

b. The reference to “*promoting journalistic and editorial standards*” in Article 6(d) should be deleted, as it risks creating ambiguity about the Union’s role in an area that lies at the very core of editorial freedom. Decisions about editorial standards are inseparable from the autonomy, freedom and responsibility of publishers, who are fully accountable under existing legal and editorial frameworks. Publishers already operate under their own editorial guidelines and standards, and in many Member States fully voluntary, self-regulated press councils establish professional standards and principles that reflect national media traditions and constitutional safeguards.

While supporting media freedom and pluralism is a legitimate and necessary objective, the involvement of third parties, including those receiving public funding, in defining or promoting editorial standards could be perceived as interference in editorial independence, especially if those standards are linked, directly or indirectly, to regulatory compliance, access to funding, or visibility on Very Large Online Platforms. Against this background, and to safeguard the principle according to which editorial

responsibility rests exclusively with publishers, the provision should focus strictly on protecting news media outlets and journalists and the “*promoting journalistic and editorial standards*” reference deleted.

III. Avoiding undue red tape for applications

AgoraEU must be designed as a funding instrument that press publications of all sizes can realistically access, rather than one that, de facto, benefits only a small number of large, well-resourced actors with disproportionate expertise in EU funding mechanisms. The ‘MEDIA+’ strand must benefit all. This requires **simple, proportionate and user-friendly administrative requirements, with clear procedures, predictable timelines and a reduction of unnecessary administrative burdens**; funding schemes adapted to the economic and organisational realities of press publishers, in particular small and medium-sized actors; and the avoidance of excessive co-financing thresholds or overly complex application processes that would de facto exclude smaller players or first-time applicants.

Administrative simplification should be recognised as a core objective of the programme, so that access to funding does not depend on specialised expertise to an unreasonable degree, thereby imposing on potential applicants a reliance on external advice and other support, legal or otherwise, and disproportionate compliance costs. This would also help ensure that AgoraEU benefits are not systematically captured by a limited circle of beneficiaries.

IV. Cross-border dimension: flexibility rather than exclusion

The press sector faces structural constraints when it comes to cross-border projects, as publications of any size tend to be **rooted in a specific European national language, a national legal framework and often in regional and even local readerships. This element, which is both a defining feature of the European press and a natural reflex of the diversity and richness of European culture, must not be inadvertently penalised, in any manner, within AgoraEU.**

Making the creation of large, multi-country consortia a decisive eligibility criterion would automatically exclude a large majority of press publishers, particularly at local and regional level. Such consortia might be useful in the context of commissioning market studies, so we would support the clarification that dedicated AgoraEU projects could be used to finance such initiatives.

The cross-border or transnational dimension should consequently be treated as an optional added value element which AgoraEU may seek to incentivize rather than a mandatory condition. Purely national or local projects should remain fully eligible where they contribute to media pluralism, economic sustainability, journalistic quality or democratic participation, in line with the realities of the press sector.