

The Evolution of Government Intervention in the Mediterranean Media System: Spain, France, and Portugal

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Abstract

Based on the comparative analysis of the three Western media system models distinguished by Daniel Hallin and Paolo Mancini (2004), this article revisits their thesis of a tendency towards the convergence of the Mediterranean model and the Liberal model—in terms of the weakening of links between media institutions and the political sphere—two decades after it was first posited. By studying the degree and nature of state intervention in the media systems of Spain, France, and Portugal in the 21st century, the aim is to ascertain whether, within a context of growing political polarisation and shrinking journalistic industry income, the distinctive characteristics of the role of the state in the Mediterranean model remain the same or have changed—and in what sense. The contextualised analysis of Spanish, French, and Portuguese policies relating to public service media, independent audiovisual media regulatory bodies, media subsidies, and state advertising on the one hand allows us to question whether state intervention in Mediterranean media systems has weakened, thereby reaffirming the thesis of the importance of nation-states in media governance and the relevance of the comparative study of national media systems in the era of digital globalisation. And, on the other hand, it enables continuities, discontinuities, and differences between the three countries to be identified in relation to the logic of clientelism that Hallin and Mancini observed in their media policies in 2004, as well as some initial elements for their interpretation to be noted.

Keywords

France; media policies; media subsidies; media systems; public service media; Spain; Portugal

1. Introduction

In their seminal comparative study of 18 Western media systems conducted two decades ago, Daniel Hallin and Paolo Mancini (2004) distinguished three models for the configuration and functioning of media systems depending on their relationship with the political system: the North Atlantic or Liberal model (Canada, United States, Great Britain, and Ireland), the North/Central European or Democratic Corporatist model (Germany, Austria, Belgium, Denmark, Finland, Norway, Netherlands, Sweden, and Switzerland), and the Mediterranean or Polarised Pluralist model (Spain, France, Greece, Italy, and Portugal). This distinction was based on an analysis of four dimensions: the development of the media market, political parallelism, the professionalisation of journalism, and the role of the state in the media system.

The authors analyse the development of the media market using indicators relating to the supply, demand, and profitability of the sector. The concept of “political parallelism” refers to the degree and nature of the links between the media and political parties or the main ideological tendencies of society, which can be observed, for example, in both the editorial lines of media outlets and the stance of editors and journalists. The issue of the professionalisation of journalism is addressed by examining journalists’ level of autonomy, shared professional rules and routines, and degree of orientation towards an ethic of public service. Lastly, the analysis of state intervention in the media system distinguishes three roles (owner, regulator, and funds provider—via subsidies and state advertising), which are examined from a twofold perspective of the level (low vs high) and the logic (rational-legal authority vs clientelism) of such intervention.

Within this framework of analysis, the development of the Mediterranean media system was, according to Hallin and Mancini, marked by the late and contested adoption of liberal institutions, including democracy (and the ensuing freedom of expression) and industrial capitalism, which in turn led to delays in establishing a modern press industry—without the press ever becoming a mass product—and the persistence of government control mechanisms and emphatic political differences. For Hallin and Mancini (2004), this media system is characterised by: weak market development; a high degree of political parallelism and polarised pluralism; frequent instrumentalisation of the media by political and economic actors, which constrains journalistic autonomy; and a notable role of the state as the owner, regulator, and funder of the media, albeit often permeated by a logic of clientelism.

However, from a diachronic perspective, they considered that, throughout the 20th century, the characteristic structures, practices, and values of the Liberal model (high industrial development, a low level of political parallelism, a high degree of professionalisation of journalism, and little state intervention with a rational-legal logic), the greatest exponent of which was the United States, had gradually and considerably displaced those of the other two media systems in Europe. They even ventured to predict a future convergence or homogenisation of Western media systems, always from the perspective of their interaction with political systems and in the sense of increasingly operating in accordance with a logic of their own, which would displace the political logic (Hallin & Mancini, 2004, p. 253).

That thesis has been supported by the recurrent arguments concerning the growing “Americanisation” and/or commercialisation of European media systems, which have been gaining momentum in academic debate since the 1990s (Blumler & Gurevitch, 2001; Chalaby, 1996; Humphreys, 1996). These considerations have been reinforced by reflections on the impacts of digitalisation, globalisation, economic

integration, and the deregulation and liberalisation of Western media markets that have favoured, among other phenomena, the formation of large transnational conglomerates, the harmonisation of media policies, and the questioning of the relevance of national spaces in the digital era (Flew & Waisbord, 2015; Mansell & Raboy, 2014; Mattoni & Ceccobelli, 2018; McChesney, 2001; McPhail, 2014; Murdock & Golding, 1999; Papathanassopoulos et al., 2023).

Over the past 20 years in Europe, the mentioned changes have coincided with the expansion and growth of political polarisation and populism (Casal Bértoa & Rama, 2021; Schulze et al., 2020)—both of which can also be observed in the media (Balčytienė & Juraitė, 2015)—and with the crisis affecting the media as both an institution and an industry (Trappel et al., 2015). Within this context of European-wide phenomena and of forces driving the homogenisation of media systems, this article assumes the hypothesis of the validity of the concept of the media system for comparative analysis (Hallin, 2020, 2021; Mancini, 2020) and aims firstly to ascertain whether state intervention in the three Polarised Pluralist systems differs from Hallin and Mancini's 2004 characterisation of it, and in what sense. Secondly, it aims to compare the evolution of such intervention in Spain, France, and Portugal for the purposes of identifying continuities, discontinuities, and differences between the three cases and trying to explain them.

These three countries were chosen because of the way they fit differently into the Mediterranean model. While various reviews of this media system typology deem that both Spain and France—as well as Italy and Greece—belong in this model (Brüggemann et al., 2014; Büchel et al., 2016), others consider that France does not (Humprecht et al., 2022), due to it having certain features of the Democratic Corporatist model, as Hallin and Mancini (2004) had already noted. As for Portugal, its inclusion in the Mediterranean model has been questioned by those reviews due to it having a more liberal political culture than the authors had initially diagnosed, which they themselves had acknowledged (Hallin & Mancini, 2012).

Based on Hallin and Mancini's distinction of the three roles of the state in the media system (media owner, regulator, and funds provider to the sector via media subsidies and state advertising) and on the indicators they used to analyse them, three issues have been taken as indicative of the intensity and nature of that intervention: the governance and independence of public service media (PSM); the powers and governance of independent media regulatory bodies; and the allocation of both media subsidies and state advertising. These are, in fact, three issues of particular concern to the European authorities, as evidenced by their inclusion in the European Media Freedom Act, the first European law to regulate them. A qualitative analysis of the policies on these issues in France, Spain, and Portugal will enable a better understanding of their similarities and differences regarding both the intensity and logic of state intervention in their respective media systems.

The analysis of the three aspects has been approached with an essentially qualitative methodology, based on documentary analysis. Firstly, the legal texts modifying the regulation of these issues in Spain, France, and Portugal over the past 20 years, as well as the academic literature examining them, have been studied to identify trends in, and the nature of, the changes. This initial analysis has been complemented by the study of the circumstances and the political and economic context framing the adoption of these changes. Secondly, the process of implementing the changes relating to the governance model of both the PSM and the independent media regulatory bodies has been analysed, with the aim of identifying possible links between political parties and the persons selected to form part of those governing bodies. The résumés of

the appointees, the media coverage of their appointments and particularly of the contested decisions taken by those bodies, and the academic literature available on these processes have been reviewed. Thirdly, public information and available reports on the allocation of media subsidies and state advertising in the three countries, as well as criticism from private actors about it, have been examined. Finally, it should be noted that part of the research for this study is based on the results of previous research on media policies in Southern Europe that the authors have been conducting over the past 20 years.

2. Spain: Persistence of Clientelist Forms of Intervention

Hallin and Mancini (2004) presented Spain as a purely Polarised Pluralist system, where government intervention in the media system combines elements characteristic of the Welfare State with others stemming from authoritarian traditions.

Regarding the lines of analysis that we are pursuing in this study, they underscored partisan control of PSM, obviously without mentioning the regulator because it did not exist at that time. They also noted that “unlike formal press subsidies in France, Italy, or the Democratic Corporatist countries, government advertising is fairly often used in Spain as a form of political pressure” (Hallin & Mancini, 2004, p. 121). Let’s see how the situation has changed.

2.1. PSM: Frustrated Attempts at Reform

The regulation of PSM in Spain has had significant ups and downs over the past two decades. The governance system has evolved from the government one described by Hallin and Mancini into the current one that, on paper at least, combines professional and parliamentary elements. In between, Spanish PSM experienced a very positive period in terms of audience share and even international recognition as a result of the reform promoted by Prime Minister José Luis Rodríguez Zapatero’s socialist government (Ley 17/2006), which sought to foster broad parliamentary agreements (to which the opposition was committed at that time) for appointing people to the high-level positions (president and board of directors) of Radiotelevisión Española (RTVE). That period ended when the conservative Mariano Rajoy came to power as prime minister, who imposed an absolute majority in the second round of voting (Real Decreto-ley 15/2012) as a system for appointing people to these high-level positions (Fernández-Viso & Fernández-Alonso, 2019).

Taking advantage of the conservative Partido Popular’s (PP’s) loss of an absolute majority, a new reform (Ley 7/2017) promoted by the opposition parties of different political leanings introduced, for the very first time, a public competition as the formula for putting forward candidates for the above-mentioned positions, even though the parliamentary chambers were ultimately responsible for appointing the 10 members of the board of directors (six by the Congress of Deputies and four by the Senate) and the president (elected by the Congress of Deputies from among the 10 members of the board of directors).

This new system turned out to be a huge failure. A committee of experts nominated by the parliamentary groups unanimously agreed to put forward 20 candidates (the top-scoring ones out of a total of 95) for the deputies and senators to select the 10 members of the board of directors and then the president from among them. However, an agreement between the two big Spanish political parties (the socialist Partido

Socialista Obrero Español and the conservative PP), alongside the conservative Basque nationalist party, and the left-wing populist party Podemos, decided to ignore the experts' assessment, arguing that, from the 20 candidates put forward, it was impossible to guarantee gender parity (which they themselves had not guaranteed in the composition of the committee of experts). Particularly striking was the fact that the names of the appointees to the new RTVE positions (selected by the four above-mentioned political parties based on their respective parliamentary representation) were publicly announced even before the candidates' required parliamentary appearances had ended (before the rounds of voting, in fact). Only three of the 20 candidates given the highest scores by the experts were among those elected. They even appointed one candidate whose management project had been awarded zero points in the competition stage (Fernández-Alonso, 2023).

In parallel to this, and based on Ley 8/2009, advertising as a source of RTVE funding was axed, meaning that PSM have since essentially had to rely on income from the General State Budgets, which amounted to €442.9 million in 2022 and increased to €546.1 in 2023. Added to this amount are several levies that private operators pay, such as the one for using the radioelectric spectrum, which put RTVE's annual income at €1.075 billion in 2022.

As it stands, both national public radio and television in Spain occupy a very modest place in terms of audience share, which is usually surpassed by the main private channels. This does not happen in all of Spain's autonomous communities (regions), where some public television operators are audience share leaders, as is the case in Catalonia. However, complaints about government interference are also common in the regional sphere (Fernández-Alonso, 2023).

2.2. The State Audiovisual Media Regulator: Belated Creation and Limited Powers

Spain was one of the last European countries to approve the creation of an independent regulatory body for audiovisual media, and when it did so, it settled on a model the likes of which Europe had never seen before: a body combining the regulation of five sectors—one of which was the audiovisual and telecommunications sector—with competition oversight. Formed in 2013, the National Markets and Competition Commission (Comisión Nacional de los Mercados y la Competencia [CNMC]) incorporated the activities of six pre-existing bodies and assumed the mandate under the 2010 Spanish audiovisual media law (Ley 7/2010) to create a national independent audiovisual media regulatory authority. When it did so, however, it significantly reduced the powers provided for it by the aforementioned law and/or the powers that various academic and professional sectors had called for. Fundamental decisions for ensuring the media system's external pluralism, such as granting and renewing audiovisual media licences and authorising business with them, or having ultimate control over compliance with limits relating to the acquisition of shares by and among operators, remained in the hands of the Executive.

The attribution of powers to the CNMC in the audiovisual media sphere did not undergo any substantial changes in the new Spanish audiovisual media law passed in July 2022 (Ley 13/2022) despite the criticism prompted not only by the above-mentioned difference in powers compared to its European counterparts—contrary to the EU's recommendations—but also by the lack of specific regulatory powers in the audiovisual media sphere (which was not the case in other sectors) and its clearly economic approach, which put the proper functioning of the market above the assurance of fundamental rights for democracy

exercised in the audiovisual public sphere. Indeed, such rights are not even mentioned in the law creating the CNMC (Fernández-Viso, 2017).

Lastly, the CNMC's governance model is another aspect that has caused controversy because it has a government system for the election of people to its high-level positions. Its 10 council members, from among whom the chair is elected, are put forward and appointed by the government after the candidates have appeared before the Congress's Economy Committee, where an absolute majority is needed to veto their appointment. Over the 10 years of this macro-regulator's existence, it has had several council members who had previously been advisers to the government appointing them.

In Spain, there are three audiovisual media regulators at the autonomous-community (regional) level. One of these, the Catalan Audiovisual Council (Consell de l'Audiovisual de Catalunya), has wide-ranging powers in local and regional spheres, including those relating to external pluralism, which the CNMC lacks. However, these three regulators are formed by council members appointed by the regional parliaments in accordance with party quotas.

2.3. State Advertising as a Covert Way of Subsidising the Media

In Spain, direct media subsidies on a national scale were axed at the end of the 1980s, with the reduced VAT rate of 4% being the only surviving indirect subsidy (extended to digital media outlets in 2020). However, it is worth noting that, in September 2023, the acting Spanish government announced the preparation of a programme aimed at driving forward the online transformation and cybersecurity of journalistic firms (Cruz Peña, 2023). Nevertheless, there is still a considerable number of regional subsidies that are awarded essentially when certain language-related criteria are met. These mostly benefit media in one of Spain's co-official languages other than Spanish (Aguado-Guadalupe & Blasco-Gil, 2020).

However, state and regional government advertising is unquestionably the main way of transferring public funds to media outlets in Spain, which involves huge amounts of money at national, regional, and local levels. While there is a clear lack of transparency in the planning and procurement processes for these campaigns (recognized by the Constitutional Court), transparency laws have led some autonomous communities to publish some interesting data. When analysing them, media outlets aligned with the incumbent powers are found to benefit clearly from state and regional government advertising campaigns (Derecom, 2022).

Regarding the Government of Spain, important figures relating to both state and state-controlled companies' commercial advertising are available, which are detailed in the annual reports published by the Office of the Prime Minister of the Government. Thus, in the 2022 financial year, the General State Administration and other entities forming part of the state public sector invested €102.5 million in state advertising campaigns, with an additional €116.4 million being spent on commercial advertising campaigns (Comisión de Publicidad y Comunicación Institucional, 2023). However, it has been impossible to get information on how these campaigns impacted media firms' accounts, not even after the opposition parties had asked for it in the national parliament (Fernández-Alonso & Espín, 2022).

3. France: Intense Intervention and a Political Culture of Checks and Balances

Hallin and Mancini (2004) characterised France as a case on the boundary between the Mediterranean model and the Democratic Corporatist model, arguing that, besides having a well-developed mass press, “it has a strong cultural tradition of the state as an embodiment of the ‘general will’ and a long history of professionalized administration” (p. 136). In their view, this explains why clientelist practices do not predominate over rational-legal authority, unlike in other countries in the Mediterranean setting.

Regarding the issues analysed in this article, the authors highlight the fact that the early creation of the Higher Audiovisual Council (Conseil Supérieur de l’Audiovisuel [CSA]) in 1989 has since limited government interference in the appointment of PSM directors. They likewise underscore the fact that France—along with Italy—is the country that awards the highest volume and variety of subsidies to all kinds of press, with such subsidies accounting for 10–15% of the publishers’ income. Let’s see if these elements persist two decades later.

3.1. PSM: Curbing a Shift Towards Regovernmentalisation

In a country where public radio and television channels are audience share leaders, this audiovisual media offering is managed by the companies Radio France, France Télévisions, and France Médias Monde, the latter of which broadcasts radio and television content in 21 languages across the globe.

Pursuant to the Léotard Law (Loi n° 1986-1067), the most recent amendment of which was in 2021, the board of directors of Radio France is formed by a president and 10 board members. That law states that the president shall be appointed by a majority of the members of the Audiovisual and Digital Communication Regulatory Authority (Autorité de Régulation de la Communication Audiovisuelle et Numérique [ARCOM]) in a reasoned decision based on the strategic projects submitted by the candidates. The board members are: one deputy and one senator, respectively appointed by the Standing Committee for Cultural Affairs in each of the legislative chambers; four representatives of the state; four independent figures appointed by ARCOM; and two members elected from among Radio France’s staff.

The Léotard Law also sets out that the board of directors of France Télévisions shall be formed by a president and 14 board members. The distribution and system for electing them is the same as for Radio France, though there are five representatives of the state and five board members appointed by ARCOM instead of four in both instances in the case of Radio France. This is also the case for the board of directors of France Médias Monde, though at least one of the five members appointed by ARCOM must have proven experience in the field of the Francophonie and another must represent the Assembly of French Citizens Abroad.

While the system for appointing board members has remained stable, the appointment of the presidents of the three companies by the independent regulator—first established in 1982—was re-established during the presidential term of the socialist François Hollande (Loi n° 2013-1028, on the independence of PSM), thereby reversing the provisions of Loi n° 2009-258 promoted during the presidential term of the conservative Nicolas Sarkozy, pursuant to which people would be appointed to these positions by government decree. Later on, Emmanuel Macron felt that such an appointment should fall to the board of directors (Khun, 2019, p. 77), but the idea was never implemented.

The central role of the regulator in the appointment of the PSM directors has not been without some controversy. This was the case for the appointment of the current president of France Télévisions, Delphine Ernotte, chosen by the CSA in 2015 and re-confirmed in her position in 2020. The Confédération Française Démocratique du Travail and Confédération Française de l'Encadrement trade unions filed complaints with several agencies about the alleged pressure by the regulator's president to promote her appointment ("Le CSA a-t-il," 2018).

Regarding the funding of PSM, the recent axing of the licence fee—their main source of income—by Loi n° 2022-1157 is significant. This was the outcome of an electoral promise made by Macron to improve households' purchasing power. The above-mentioned law sets out that, in 2023 and 2024, PSM funding will come from a fraction of the VAT set in the Finance Law (€3.8 billion for 2023). The bill, however, envisaged that funding would be linked to the General State Budgets. That idea was thrown out for several reasons. One of these was a report by the General Inspectorate of Finance and the General Inspectorate of Cultural Affairs, which issued a warning about the volatility of that formula, which had weakened PSM in other countries (Zarka, 2022). At the same time, during the debate that led to the reform, several voices (trade unions, cultural stakeholders, and left-wing parties) raised concerns about the risks to the independence of PSM that a change in the funding model might entail (Jannic-Cherbonnel, 2022).

However, the 2023 barometer on trust in the media among the French indicates that 48% positively value the existence of PSM, whereas only 11% negatively value it (Kantar Public, 2023).

3.2. Strengthening of the Regulator

ARCOM is an independent public authority created in 2022. It is the outcome of a merger between the CSA and the High Authority for the Dissemination of Works and the Protection of Rights on the Internet (Haute Autorité pour la Diffusion des Œuvres et la Protection des Droits sur Internet) under Loi n° 2021-1382. This new regulator has nine members, who have a non-renewable term of office of six years. Its chair is appointed by the President of France with the approval of 3/5ths of the members of the Standing Committee for Cultural Affairs in each of the legislative chambers. Three members are appointed by the president of the National Assembly and a further three by the president of the Senate. The favourable agreement requirement is the same as that for the appointment of the chair, but in this case only by the committee of the respective chamber. One member is appointed by the vice-president of the Council of State and another by the president of the Court of Cassation.

The members appointed by the Council of State and the Court of Cassation were introduced under the 2021 reform. The other members are appointed pursuant to Loi n° 2013-1028 mentioned further above. This law reduced the number of members of the then CSA appointed by the President of France from three to one, and set the qualified majority needed in the standing committees to appoint the other six members of the current ARCOM.

The regulator's powers, which had traditionally been very significant in the audiovisual media sector, have gradually been increased by various laws as a result of technological transformations and the implications thereof, such as the major deployment of streaming platforms and social media. ARCOM therefore has two main lines of action: to promote the influence, diversity, and creativity of both French audiovisual media and film; and to protect citizens in the face of new digital challenges by developing a safer internet.

3.3. *The Key Role of Media Subsidies*

France has a long tradition of media subsidies and undoubtedly the most complex system and the biggest budget of all the countries in the Western European setting. The latest available data at the time of writing this article were those corresponding to 2022: €110.4 million in direct subsidies, of which €28 million were for the promotion of pluralism (e.g., subsidies for various publications with few advertising resources, local and proximity media outlets, and overseas media outlets); €51 million for transport and distribution; and €31.4 million for investment in projects aimed at addressing the challenges of the green and digital transition (Ministère de la Culture, 2023). Added to these are nine new indirect subsidy modalities, which are essentially fiscal and social in nature. There was also an exceptional subsidy for self-employed journalists during the Covid-19 pandemic. The subsidy modalities and the beneficiaries thereof (since 2012) are published in some considerable detail on the Ministry of Culture's website, which is the competent body in this area.

However, criticism is often levelled at the distribution of direct subsidies. For example, *Mediapart* (Plenel, 2023) and the *ACRIMED* Observatory (Friot, 2022) have both performed analyses denouncing the fact that the big beneficiaries of such subsidies are always the large media outlets. Be that as it may, a report by the Senate (Karoutchi, 2021) showed that, without counting fiscal expenditures, media subsidies accounted for 21.4% of the sector's turnover.

Thus, both that report and other studies (Bastin, 2019) have put forward numerous ideas for simplifying and adapting the subsidy system to the new technological and consumption habit context. These include the incorporation of mechanisms that place conditions upon beneficiaries, such as good professional and business practices, and—for the sake of independence—not ruling out the idea of an independent body being commissioned to manage it.

4. *Portugal Towards the Degovernmentalisation of Media Policies*

In response to the early criticism questioning Portugal's classification under the Polarised Pluralist model, Hallin and Mancini (2012) admitted that they had relatively little information about this country available to them when conducting their study. They also wondered about the possible causes of the Portuguese case's distancing from path dependence, which in Mediterranean model countries explained the persistence of authoritarian traditions and political polarization.

The description of the Portuguese media system in their work placed it much closer to the Liberal model than, for example, that of France, but always within the Mediterranean model. Regarding state intervention, they highlighted the process of savage deregulation that the State had set in motion in the 1990s, the government model of its PSM's governance, and the existence of both indirect media subsidies (reduced tax and transport rates) and direct ones (subsidies for training and technological modernisation).

4.1. *PSM Reform With Elements of the Professional Model*

In 2004, Portugal unified its state public service radio and television firms into a single company, *Rádio e Televisão de Portugal* (RTP), within the framework of a reform and financial restructuring plan for its PSM,

which concluded with a change in its funding model in 2013 and the approval of new RTP statutes in 2014 (Lei n° 39/2014). That last legal reform, which was promoted by Pedro Passos Coelho's conservative government, changed the governance system in order "to reduce the risk of RTP's governmentalisation" (Santos Carrapatoso, 2014). To do that, it put an end to the election of the members of its board of directors and of its president by the general meeting of shareholders (several ministries and various publicly owned entities) that oversaw the media organisation. The new law provided for the creation of an Independent General Council (Conselho Geral Independente [CGI]) inspired by the former BBC Trust as the body to guide, supervise, and internally scrutinise the fulfilment of RTP's public service obligations. The CGI assumed the function of appointing members of the board of directors, including its president, the composition of which had been reduced from five to three members.

The election of the six CGI members is split between the government and the RTP Opinion Council (Conselho de Opinião)—an advisory body formed by 30 representatives of public bodies, trade unions, and social entities—that each appoint two council members, with the four elected members then putting forward the two remaining ones. Their suitability for the position must be assessed by the Portuguese Regulatory Authority for the Media (Entidade Reguladora para a Comunicação Social [ERC]). Even though the ERC's decisions are not binding, in 2014 the Portuguese government did not dare confirm the appointment of one of the council members that it had put forward but who had not received the ERC's approval. The regulator's opinion on appointments and dismissals of those in charge of RTP's media outlets and news services is binding. Such appointments and dismissals are carried out by the board of directors.

The implementation of this reform was not without controversy. In 2014, the CGI—whose president was one of the council members appointed by the government—locked horns with the board of directors—which could not be renewed until mid-2015—on the definition of the strategic project for RTP. The five content directors of the PSM asked the ERC, by letter, to clarify the CGI's powers in light of what they deemed government interference by that body in RTP's editorial decisions. The ERC considered the CGI's action a "serious violation" of the PSM's editorial policy ("ERC critica CGI," 2014). However, the CGI finally managed to force the board of directors' resignation after asking the shareholders (the State) to dismiss it, and went on to appoint a new one, whose president was a former deputy of the governing party, who had already held a high-level position in RTP. The new team dismissed all those in charge of RTP's media outlets and news content, even though one of those dismissals was rejected by the ERC. In 2021, the CGI again ignored voices calling for a renewal of the board of directors by means of a public competition, and proceeded to elect the new members of it.

In recent years, the perception of the risk of political interference in Portuguese PSM has also been associated with the change in its funding model and the instability of its income. Despite having a licence fee—established in 2003—among its sources of income, which all households pay with their electricity bills, it only amounts to an annual €36.25 per household and has not been updated since 2016. In 2022, it delivered €185 million to RTP, accounting for 80% of its total income (€230.6 million; RTP, 2022). Following the axing of the state subsidy in 2013, RTP no longer receives around €90 million. However, even though RTP's radio and television channels closed out 2022 with audience shares behind those of their private competitors (Observatório da Comunicação, 2022), 67% of the Portuguese population considers them the most reliable news sources according to *Eurobarometer Media & News Survey 2022* (European Parliament, 2022).

4.2. A Regulator for the Entire Media Sector

The amendment of the Portuguese Constitution approved in 2004 (Lei Constitucional n° 1/2004) included, in Article 39, a provision for the creation of an independent administrative body to regulate the media, as well as a list of its basic functions. Pursuant to that mandate, Portugal formed the ERC in 2005 (Lei n° 53/2005), which replaced the High Authority for the Mass Media (Alta Autoridade para a Comunicação Social), which had been in operation since 1989, albeit with limited powers. The ERC regulates and supervises all organisations carrying out media activities under the Portuguese State's jurisdiction, regardless of their format or medium (news agencies, press, radio, television, online media, on-demand audiovisual services, etc.).

Among the ERC's many attributions are: ensuring citizens' rights, freedoms, and guarantees in the media and, in particular, promoting pluralism; preventing the concentration of media ownership; ensuring the independence of the media from political and economic powers; ensuring the fulfilment of media regulations; and scrutinising the compliance of all state advertising by all state administrations with the legal principles in this area. It coordinates its activity with: the Portuguese Competition Authority (Autoridade da Concorrência) to ensure the proper functioning of the media market; the Portuguese regulatory authority for postal and electronic communications (Autoridade Nacional de Comunicações) on aspects such as radioelectric spectrum planning; and the government to issue and resolve calls for applications for audiovisual media licences, as set out in the audiovisual media services law. To carry out its functions, the ERC has been given broad regulatory, supervisory, and sanctioning powers.

The Regulatory Board is its highest governance body (Lei n° 53/2005). It comprises a chair, a vice-chair, and three board members, who have a non-renewable term of office of five years. The Assembly of the Republic appoints four members by a 2/3rds majority of the deputies, and these four then put forward the fifth. This system has been criticised because, in practice, it leaves the door open to a proportional distribution of appointments among the various political groups of the legislative chamber, and also because it does not have a precise definition of the professional profiles or specialist knowledge needed to form part of the ERC's Regulatory Board.

4.3. Media Subsidies and State Advertising Transparency

The 2008 financial crisis and the EU's bailout of the Portuguese economy in 2011 led to significant cutbacks in public subsidies for the media sector—particularly the audiovisual media sector—in the early 2010s (Lameira & Sousa, 2017). In 2015, Decreto-Lei n.º 23/2015 established a new regime for public subsidies for the media, focusing on local and regional media, to promote the diversity of the media system. It provides for two types of subsidies: financial assistance to offset part of the cost of the postal distribution of publications; and a line of funding for technological modernisation, digitalisation, media literacy, and strategic project development. For example, the region covering the capital city awarded a total of €83.500 in subsidies in 2022 (Comissão de Coordenação e Desenvolvimento Regional de Lisboa e Vale do Tejo, 2022).

It is a decentralised system managed by five coordination and regional development committees. Within the context of the crisis caused by the Covid-19 pandemic, however, the State implemented a package of direct media subsidies in the sum of €15 million, in the form of advance procurement of state advertising space ("Apoio aos media," 2020). The Portuguese state advertising law of 2015 (Lei n° 95/2015) sets out precise

transparency obligations for this type of public investment by the State and its firms within the media system, and also for distribution across national territory. For example, 25% of the overall cost of each campaign must be channelled via local and regional media.

Supporting documentation of the cost of each campaign must be sent to the ERC within a maximum period of 15 days from the date of procurement so that it can proceed to verify and scrutinise the fulfilment of regulatory obligations. In an exercise of transparency on this matter, which is very uncommon in the European setting, the ERC produces detailed monthly and annual reports about the volume and final destination of each of these procurements, and publishes them on its website. In 2021, the Portuguese State procured 93 campaigns amounting to a total of €12.5 million—€10.5 million more than in 2020 and €9 million more than in 2019—benefiting 699 media outlets (ERC, 2022, pp. 253–263).

5. Conclusions

Within the mentioned context of political polarisation and media industry crisis, which is embedded in an unstoppable process of globalisation, we can conclude that the characterisation established by Hallin and Mancini two decades ago in terms of government intervention in Mediterranean media systems (central role of nation-states) is to a large extent still valid today.

In Spain, there continues to be considerable political interference in national and regional PSM, which are the sources of news for a large proportion of the population. Attempts at degovernmentalisation have not taken hold at all, and the parliamentary rebuff of the candidate assessments in the open competition for appointments to high-level positions in RTVE after the 2017 reform is particularly striking. At the same time, successive transparency regulations have seldom managed to ensure the availability of information on how the huge investments that the various administrations continue to make in state and regional government advertising campaigns impact the accounts of media firms. When available, a bias in favour of politically aligned media outlets has been identified. The creation of the macro-regulator in 2013, whose powers include those for audiovisual media, was certainly novel. However, such powers are limited compared to those of the regulators in other countries in the Mediterranean setting, and they are managed by council members appointed by the government.

In France, a long-established and ever-strengthened independent regulator continues to play a central role. Its power to appoint the presidents of the companies managing PSM was lost to the government in 2009, but that measure was reversed in 2013. The 2013 reform also reduced the number of ARCOM members appointed by the French Executive and strengthened the parliamentary majority needed to appoint other members. Since 2021, the Council of State and the Court of Cassation have also been involved in the election of board members. At the same time, the country continues to have a complex system of direct and indirect media subsidies, with a high budget that, despite favouring media outlets with higher audience shares, accounts for around 20% of the sector's turnover.

In Portugal, however, state intervention has diminished over the past two decades in terms of PSM funding and investment in both media subsidies and state advertising. At the same time, interesting advances towards the degovernmentalisation of the PSM governance system were observed, as evidenced by the creation—along BBC Trust lines—of the CGI, which resulted from a 2014 reform. In this regard, government powers have been

transferred to independent bodies, such as the ERC and the PSM's CGI, or regional bodies. Very interesting is the ERC's scrutinisation of appointments to high-level positions in RTP, with tangible results. Finally, the role of the ERC, which, like ARCOM, has very broad powers, is particularly striking due to the transparency it gives to the state advertising procurement process.

Thus, France and Spain are the countries where the strongest government intervention was observed (including high levels of investment in terms of PSM and private media funding), although such intervention in the Spanish case has more elements stemming from authoritarian traditions. In Spain, longer-lasting feudalism combined with the late arrival of democracy and an extraordinarily decentralised administrative structure (with governments at national, regional, provincial, and local levels) explain the manifold clientelist practices that we have noted. The growing political and social polarization that Spain has been experiencing for a decade makes it unlikely that this situation will be reversed in the short term.

Despite the occasional criticism and the polarisation also being experienced in France, the country has a strong system of checks and balances that could be clearly observed when analysing the composition and functions of the independent regulator. To understand why this is so, it is necessary to take into consideration the earlier implementation of liberal institutions as well as the tradition of professionalised administration in that country. France (the EU Member State with the highest public spending as a proportion of GDP) therefore retains elements that, in terms of government intervention, bring it closer to those countries that fit into the Democratic Corporatist model (guided by the logic of the Welfare State) as Hallin and Mancini had already anticipated in 2004.

In Portugal, lastly, a reduction in the number of mechanisms enabling clientelist practices was observed, which confirms Portugal's distancing, as has happened in the case of France, from the purest Mediterranean model to which Spain is closest. The effects of the 2008 financial crisis and the conditions placed upon the Portuguese economy's 2011 bailout by the Troika (European Commission, European Central Bank, and International Monetary Fund) are some of the factors that have driven this change, which is nevertheless rooted in a political culture that, since the overthrow of the authoritarian regime in 1974 and subsequent restoration of democracy as its form of government in 1975, has sought points of reference in advanced European democracies such as the British and French ones.

It is beyond the scope of this article to delve deeper into the identification and analysis of the causes of the different evolution of state intervention in the three analysed media systems in the 21st century. However, advancing this line of research is of unquestionable relevance and interest in order to better understand the complexity of relationships between media and political systems in Southern Europe.

Conflict of Interests

The authors declare no conflict of interests.

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