

## **INTRODUCTORY NOTE. TRANSPARENCY IN THE MEDIA: CHALLENGES AND CONSTRAINTS**

### **NOTA INTRODUTÓRIA. A TRANSPARÊNCIA DOS MÉDIA: DESAFIOS E LIMITES**

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With its growing significance across various spheres of social life, transparency has increasingly gained relevance within the media sector. As a fundamental pillar of democratic and free societies, it serves to hold governments and other political actors accountable. Transparency is also a central instrument in policies and strategies designed to regulate the news media. Specifically, it has been recognised as a widely accepted response to concerns regarding the erosion of media pluralism and declining trust in journalism (Karlsson, 2020) while also functioning as a mechanism for monitoring and regulating media ownership (Figueira & Costa e Silva, 2023).

This understanding is grounded in the assumption that conditions for responsible and accountable journalism must be ensured, as the primary requirement for an informed citizenry is access to reliable information and accurate facts that enable sound decision-making (Strömbäck, 2005). The media — particularly public service media — have proven indispensable in keeping the public informed (Aalberg & Curran, 2012), as society requires “a certain kind and quality of information to aid in self-governance and community sustenance and journalism’s unique qualifications for providing that information” (Craft & Heim, 2009, p. 217). Thus, media and democracies are interdependent social constructs, with the news media playing a vital role in enhancing the accountability of various centres of power (Lindgren et al., 2019; Schudson, 2008), ensuring continuous scrutiny and sustaining the vibrancy of democratic systems. However, in today’s climate — marked by societal polarisation and collapsing business models — the news media are exhibiting clear signs of strain.

To address these challenges, communication policies at both national and European levels have established the principles of accountability and visibility as fundamental

cornerstones guiding the media's operations in two key areas: accountability to public authorities regarding ownership transparency and sources of funding and accountability to the public through the visibility of production processes. The rationale behind this growing demand for transparency lies in the belief that journalistic production must be subject to mechanisms that assess its effective contribution to democracy, as this function is not a self-fulfilling prophecy (Trappel & Tomaz, 2021, p. 11). While transparency remains a concept under development, it encompasses the dimensions of process visibility, openness, and agent accountability within a context where the social benefits of such exposure are anticipated (Karlsson, 2010; Singer, 2006).

At the European level, media transparency is becoming increasingly significant. From the adoption of the Audiovisual Media Services Directive to the ongoing discussions surrounding the Media Freedom Act, proposed by the European Commission in September 2022, a growing number of provisions have been introduced to ensure transparency across various dimensions, particularly in relation to advertising practices, public funding, and media ownership — the latter being a crucial aspect of European policies. This understanding has been embraced by institutions such as the European Union and the Council of Europe. To this end, the European Commission has commissioned two phases of a pilot project aimed at creating a mechanism for monitoring media ownership. As part of this project, *EurOMo* (<https://media-ownership.eu/>), a database has been made available that highlights the differences between countries and the challenges that transparency faces (Tomaz, 2024).

Ownership is not the sole condition for the proper functioning of news organisations. However, it remains a crucial requirement to ensure that the media do not stray from their fundamental mission. Due to the connections they can establish with political and economic power — both in terms of news production and funding — media outlets may become hostage to political and economic interests (Cagé et al., 2017; Dragomir, 2019). Therefore, the principle of promoting transparency can help mitigate this risk, as it is based on the assumption that information regarding who owns the media and how journalism is financed must be made publicly available (Picard & Pickard, 2017).

There are high expectations within both the media and political systems that transparency can address some of the challenges faced. Transparency can help restore and strengthen the credibility of journalism (Craft & Heim, 2009), as journalism that clarifies its relationships with agendas and sources of information, as well as one that is open about how it finances itself, is a journalism that seeks to maintain trust with its audience. Professional practice can be transformed by holding agents accountable to their news consumers (Bock & Lazard, 2021; Heim & Craft, 2020), while, at a corporate level, visibility of ownership management practices can enhance the perception of journalism's independence and credibility (Cappello, 2021).

Nevertheless, implementing the principle of transparency is not without its risks or obstacles. The transformation of newsroom culture is an ongoing process, constantly threatened by inertia, and the complex management tools — particularly financial ones — used by organisations often make it difficult for the public to understand. Additionally,

the chain ownership that characterises many news organisations, along with the algorithmic platformisation of society and cultural production (Poell et al., 2022), highlights the complexity of the issue. It becomes evident that just as transparency is a multidimensional concept, the threats and barriers to its implementation are also multifaceted.

The growing political importance of the principle of transparency, which, as previously mentioned, extends beyond the media sector, has made it omnipresent in communication policies. It now dominates much of the discussion, as well as legislative and regulatory efforts, and is currently a key dimension of the public debate surrounding media responsibilities (Miranda & Camponez, 2022). However, the very notion of “transparency” must be continually questioned and scrutinised. Its normative value, which is theoretically unquestionable, often contrasts with the conditions under which it is operationalised, particularly in social and political contexts, raising doubts about the effectiveness and scope of communication policies. While it is prioritised on the public agenda, the ethical dimension of transparency faces challenges due to the “complexity in operationalisation and grounded practice” (Bock & Lazard, 2021, p. 900), which need to be acknowledged and critically examined. Furthermore, can transparency truly be a borderless panacea, or should limits be established for the ideal transparency to be considered (Ananny & Crawford, 2018)? Moreover, can the political discussion around media regulation be fully addressed by issues of transparency? Should transparency be the ultimate goal of communication policies or merely a tool to support other regulatory interventions?

These questions remain central to academic research and under the scrutiny of researchers, policymakers, and civil society. Just as the media’s contribution to democracy is not a “self-fulfilling prophecy” (Trappel & Tomaz, 2021, p. 11), the consequences of implementing the principle of transparency at various levels of media operation do not always lead to the anticipated benefits. This thematic volume of the journal *Comunicação e Sociedade* seeks to bring together contributions that critically examine the principle of transparency, exploring it not only conceptually but also within empirical contexts. In response to the call for papers, the articles now published offer perspectives that add density and complexity to the concept of “transparency”, examining concrete applications and unresolved challenges. This volume offers broad geographical coverage, with contributions from Latin America (Brazil and Chile), Southern Europe (Portugal), the Nordic countries (Finland and Denmark), and the Baltic states (Lithuania, Latvia, and Estonia).

It presents key contributions to understanding the dimension of ownership transparency, underscoring its significance as a recurring concern within the media sector. The volume opens with three articles stemming from the work of national teams involved in *EurOMo*, the project mentioned above initiated by the European Commission. The first article, authored by Marko Junkkari, Marko Ala-Fossi, and Mikko Grönlund, examines tools for measuring media ownership with a focus on “Making News Media Ownership Chains Transparent by Relational Databases”. This paper highlights the challenges in understanding ownership mechanisms, particularly indirect ownership relationships and long ownership chains. It emphasises that the outcomes of various studies are directly influenced by the quality of the data on which the analysis is based, and the availability of

such information is not always assured. In this regard, the authors suggest that a structured database could help address some of these challenges, enabling more in-depth analyses, especially across borders.

Also stemming from participation in the *EurOMo* project, the work by Mark Blach-Ørsten, Ida Willig, Mads Kæmsgaard, and Rasmus Burkal examines how digitalisation has impacted media systems rooted in strong democratic principles. In their article, “Changing Forms of Ownership in a Democratic Corporatist Media System — How Digitalization Leads to Less Transparency and the Risk of Media Capture”, the researchers show that, in the absence of a culture of disclosing the political or commercial interests of individuals who own digital media in Denmark — particularly private investors — the risk of media capture by these owners is heightened.

Finally, completing the trio of papers arising from the *EurOMo* project, the research by Anda Rožukalne, Aukse Balčytienė and Halliki Harro-Loit, titled “Towards Responsible Media: Understanding the Baltic Countries’ Traits Through the Lens of Transparency and Accountability Analysis”, explores the principle of transparency in media ownership in relation to media accountability, using case studies from Estonia, Latvia, and Lithuania. In their *EurOMo* monitoring proposal, the authors incorporate conceptual and methodological principles from a second project, *Mediadelcom*, which examines how changes in media ownership and control affect media accountability and performance. The authors conclude that while small markets like those in the Baltic countries have fostered transparency through informal mechanisms, this trend poses several risks to accountability. As a result, they recommend the adoption of more explicit regulations regarding the transparency of practices, such as the selection of editors-in-chief by media owners.

The next two contributions also focus on transparency in terms of ownership but from the perspective of the ethos of self-transparency within professional media. Luís Bonixe uses examples of entrepreneurial journalism — independent and alternative journalistic projects — to demonstrate that the practice of transparency regarding ownership and funding mechanisms, as argued by Cappello (2021), is adopted as a form of affirmation in news production. In the article “Promoting Transparency as a Strategy for Affirmation in the News Market: An Analysis of Entrepreneurial Journalism Projects”, Bonixe highlights the instruments that these media use to distinguish themselves from traditional organisations.

Constanza Hormazábal, in turn, examines how editors of traditional Chilean media perceive transparency, focusing on its role in accountability and the relationship with audiences. In “Transparency and Audience Participation: A View From Media Directors and Editors in Chile”, the author concludes that interviews with directors and editors reveal a shared understanding that the media’s social role underpins the importance of transparency. However, transparency is not limited to disclosing information about media ownership as a means of fostering accountability, quality, trust, and audience engagement. It encompasses a broader scope, potentially including greater openness about news production processes and journalists’ profiles — a line of inquiry the author plans to develop further in future research.

The analysis of media verification mechanisms dedicated to fact-checking is the focus of Andressa Buttore Kniess, Naiza Comel and Francisco Paulo Jamil Marques, who examine two news agencies in Brazil. In the article “Fact-Checking and Journalistic Authority in Brazil: An Analysis of Fato ou Fake and Estadão Verifica”, the authors highlight how the self-referential nature of verification processes can undermine transparency. They argue that by relying on prior journalistic output that lacks transparency, fact-checking articles often perpetuate opaque information curation strategies. As a result, much of the information in verification articles is shaped by earlier editorial filters that are not always evident to the public.

This thematic volume concludes with two contributions that shift focus downstream from news production, examining the institutions that serve as sources of information for journalists. These studies consider the premise that the media’s role in fostering transparency within the public sphere and democratic societies stems from prior interactions, which themselves warrant analysis. Daniel Reis Silva and Fernanda Shelda de Andrade Melo explore the self-visibility practices of civil society institutions specifically dedicated to promoting transparency in the public sphere, highlighting their significant influence on the news media. The article “Dual Transparency in the Self-Presentation of Brazilian Civil Monitoring Initiatives on Public Transparency” identifies several shortcomings in the transparency practices of these organisations. It argues that these monitoring initiatives, which play a crucial role in upholding democratic principles, fall short in various dimensions of fulfilling the standards expected of public institutions.

Finally, Marcia Michie Minakawa and Paulo Frazão examine the active role of the press in promoting and mediating the debate on HPV (human papillomavirus) vaccination in Brazil. The authors evaluate the transparency of discursive “biases” in the sources cited by journalists in articles published between 2014 and 2018 on HPV vaccination, analysing the narratives both supporting and opposing vaccination. In their article “The Introduction of the HPV Vaccine in Brazil, the Print Media, and Misinformation”, they highlight the significant influence of these sources in shaping public opinion, affecting personal health decisions and individual choices. At the same time, the study underscores the role of transparency in public health policies designed to advance public well-being.

This collection of articles aims to offer the scientific community an up-to-date perspective on the ongoing debates surrounding transparency within and about the media. After years of advocating for public policies centred on transparency, it is crucial to examine their impact on everyday communication practices. Such an analysis is essential for evaluating the successes and shortcomings of the measures implemented thus far and for charting a path forward.

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