Audience measurement is key to ensuring a viable European Media Industry:

it is time for the European Parliament to take a strong stand!

Dear CULT Rapporteur and Shadow Rapporteurs on the EMFA proposal,

We – the undersigned organisations, representing public and commercial media service providers, Media and Communication Agencies, Joint Industry Committees, and audience measurement providers – urge you to create the enabling conditions for a sustainable and pluralistic media industry, and ultimately for a thriving democracy in Europe, through more ambitious obligations in relation to audience measurement in the EMFA. We call on you to include the following principles in Article 23:

- A definition of audience measurement that covers the entire content market which includes users of all online platforms such as proposed in CULT AMs 452 to 458

- Include in paragraph 1 that “to secure impartiality in measurement, audience measurement systems shall be carried out by independent third parties or self-regulatory bodies” [as proposed in the IMCO adopted compromise and supported in CULT AM 1227]. The independence of audience measurement is a key component of impartiality and a fundamental standard and practice within market-agreed measurement. At the same time, it should be clarified that media service providers are not prevented from measuring the performance of their content or services, for example on their own websites and platforms, including through the use of their own, measurement systems, or when they rely on third-party tools or software available on the market.

- Ensure that collaboration with independent measurement providers is done in good faith and that data shared in that context has the quality and granularity to produce measurement that is comparable for the market [as suggested in CULT AMs 1228 to 1231 and proposed in IMCO adopted compromise in article 23 paragraph 2: “The information must be as granular as the information provided by the rest of the media market, including non-aggregated data.”].

- Include in paragraph 2 an obligation for providers of proprietary audience measurement systems to share audience measurement data in the form of aggregated and non-aggregated data, free of charge, with media service providers regarding their own content and services [as suggested in CULT AMs 107 by the Rapporteur, 1232 and 1238, and recognised in the IMCO adopted compromise].

- Ensure in paragraph 3 that the codes of conduct uphold the highest recognised standards in audience measurement and are made mandatory [as suggested in the IMCO adopted compromise and in CULT AMs 1244 to 1246, 1248 and 1249] and ensure that independent third-party audience measurement providers and self-regulatory bodies are duly consulted when drawing up the codes of conduct [as proposed in CULT AMs 380 and 1253]

- Clarify what constitutes a provider of proprietary audience measurement systems and what does not. Proprietary audience measurement systems should be considered as systems “developed without market governance and outside industry standards agreed by the relevant self-regulatory bodies” [as proposed in CULT AMs 147 and 1236]. Independent third parties, self-regulatory bodies and “Media service providers which abide by the commonly agreed industry standards shall not be considered as providers of proprietary audience measurement systems”, [as suggested in CULT AMs 147 and 148]

Audience measurement plays a crucial role in Europe’s media industry. It provides valuable insights into consumption patterns, helping media companies understand their audiences. Such data allows
them to tailor their content and advertising strategies. In the case of public service media, audience measurement further helps in monitoring and demonstrating that they fulfil the objectives laid down in their public service remit. Advertisers also rely on accurate and trusted audience measurements to make informed decisions about where to allocate their advertising budgets. Finally, public authorities depend on audience measurements to observe changing trends in media usage and culture.

Together, we – the undersigned organizations – have built a transparent, fair, and trusted system for audience measurement in Europe, that has enabled all actors in the media market to play by the same rules and speak the same language.

This system of transparency, fairness, and trust, which has worked well for decades, is however facing disruption from powerful digital players, who do not follow these rules. These players produce their own audience measurement and when used in the market this further reinforces their dominant position.

To this day, they have chosen to self-determine the size and composition of their audiences and establish their own “currency” outside any independent overview and in direct competition with companies that go to great strides to be transparent in the general interest and to the benefit of the level playing field for the European media industry.

With the European Media Freedom Act (EMFA), the European Parliament is now presented with a unique window of opportunity to address such behaviour on European markets.

We very much hope that you consider these important concerns to prevent economically powerful platforms from being able to maintain undue advantages through a strategy of selective or potentially biased dissemination of information on audiences.

Yours sincerely,

Signatories:

**AIMC** - Asociación para la Investigación de Medios de Comunicación

**AMC - Audience Measurement Coalition** sector coalition of like-minded research companies & Joint Industry Committees (JICs) including as Nationaal Media Onderzoek NMO (NL), Mediamätning i Skandinavien MMS (SE), FINNPanel (FIN), IVW (DE), Infoline (DE), ÖWA (AT), Médiamétrie (FR), Mediapulse (CH), Nielsen, Kantar, GfK and Gemius

**ARMA** - Romanian Association for Audience Measurement

**EACA** - European Association of Communications Agencies

**EBU** - European Broadcasting Union, the world’s leading alliance of public service media organizations, with Members in 56 countries in Europe and beyond

**EMMA** - European Magazine Media Association, representing more than 15,000 publishing houses across Europe, publishing more than 50,000 magazine titles

**ENPA** - European Newspaper Publishers Association, international non-profit organization representing publishers of newspaper and news media on all platforms
ESOMAR - the European Society for Opinion and Marketing Research

I-JIC - The International Association of Joint Industry Committees for Media Research

Mediapulse - Swiss Corporation for Media Research

UDECAM - l’Union Des Entreprises de Conseil et Achat Média

TV PULS - Polish commercial television channel

WEMF - AG für Werbemedienforschung, Swiss independent industry research organisation