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ISPA Austria's comments on the draft Council Conclusions on media literacy in an ever-changing world

1) Media literacy must target young and old generations equally

Every person with an internet connection has an abundance of information available. Access to news articles from all over the world, research papers and all kinds of entertainment is easier than ever before. But with this availability also the importance of media literacy has grown. The initiative Saferinternet.at, co-funded by the European Commission, has provided high value educational material to raise (online-) media literacy in Austria for 15 years now. The material is used in schools but also at home and extracurricular youth organisations to help children and adolescents to learn which information they can trust and how they can research to verify information they find online.

Considering that media literacy is important on from an early age it is crucial to have relevant materials available for young audiences. A good example is the children's book "[The Online-Zoo](#)" which is targeted at children from the age of 4 to 9 and raises awareness of the challenges young users with access to internet and digital devices may encounter. The book has one overarching goal: empowering children to be safe on the internet. This involves teaching them to be mindful about their internet use and about the challenges they will likely face, alongside with providing them with the right tools to overcome these challenges. We believe that empowering children on from an early age rather than restricting the available content is a much more efficient way to deal with false information online.

Moreover, since parents and grandparents often read the book together with their children and grandchildren, also older generations are encouraged to refresh their knowledge on media literacy. Our experiences have shown that very often there are topics and challenges that are completely clear for a child but not older generations. TI is therefore not only children and adolescents who need guidance to evaluate information online. Studies show that adults over 65 are most at risk to believe and share fake news online whereas children and adolescents are much more critical on the information they consume online.¹ In these times it is therefore more important than ever to stay up to date and to continue one's education throughout one's life. Adequate materials and workshops should thus be provided for interested adults as well.

2) Internet intermediaries are not threatening media pluralism and qualitative content

The problem of sensationalism and clickbait journalism which is raised on page 4 does not stem from the use of algorithms or internet intermediaries as such. Rather, lurid headlines and explicit pictures on front pages of newspapers have been used by media outlets to attract customers long before the internet has been invented.

Moreover, internet intermediaries in fact enhance media pluralism and content diversity rather than curtail it, by providing the opportunity to easily reach out to millions of other users worldwide. In this way new and innovative content providers can quickly reach new markets and address new audiences. Compared to traditional media the diversity of content is thus significantly higher. Similarly, internet intermediaries grant small newspapers a chance against the market incumbents and thereby contribute to a level playing field in the media landscape as well.

As with traditional media the quality of the content however varies considerably and not all content fulfils the criteria of high-quality journalism or even is intentionally wrong and misleading. An important aspect is therefore to ensure the financial independence of providers of qualitative content in order to ensure their economic survival.

The increasing free availability of digital content has led to changes in user behaviour and new challenges. Revenues are increasingly generated by income from online advertising and no

¹ Guess, Andrew/Nagler, Jonathan/Tucker, Joshue: Less than you think: Prevalence and predictors of fake news dissemination on Facebook. In: *Science Advances*. 09 Jan 2019. Vol. 5, no. 1, 4586.

longer by sales of the respective press product. For this reason, the number of visits to a website is becoming more and more important, which increases the tendency to increasingly rely on "clickbait" articles instead of qualitative content. It follows that "clickbait" is therefore caused rather by business models of the content providers and not by the intermediaries or the algorithms used.

New financing models should thus be assessed whereas so far, it has been shown that a combination of free content, paid content and subscriptions is the most successful. The ideal distribution of these three factors varies depending on the type of content and the users.

3) Further regulation risks curtailing freedom of speech

We do not see the need for further regulation of internet intermediaries. The biggest platforms agreed on a self-regulatory Code of Practice to tackle the issue of disinformation online. This commitment has the goal to reach the objectives the European Commission presented with the Communication "Tackling online disinformation: a European approach" in April 2018 and is on a good way. Transparency of information online has already increased significantly which has fostered the credibility of information. Measures like the Code of Practice are effective and taken seriously by the industry to improve the online experience for every user.

New regulation on the other hand which would make internet intermediaries liable for contributing to the spread of false information or require them to expeditiously remove content that is flagged as "fake news" entails a high risk of restricting free speech online. We therefore encourage the Council from refraining from suggesting any new hard legislation or regulation in this regard and rather continue the successful dialogue with internet intermediaries to find effective and well-balanced solutions.

Sincerely,

ISPA Internet Service Providers Austria



Dr. Maximilian Schubert
Secretary General