



Dear Sir/Madam,

RE: Broadcasters across Europe call on policymakers to preserve the inclusive and open design of the AgoraEU programme and to reject calls for the introduction "independent production" restrictions in AgoraEU

We are writing on behalf of associations representing Europe's commercial audiovisual media, whose members invest in, commission and distribute audiovisual content and trusted news across the European Union and beyond. We are reaching out in reaction to calls to exclude audiovisual media services from the scope of the European Commission's AgoraEU proposal, through the introduction of an "independent production" or "independent producer" restriction in the text.

We strongly support the proposal as originally tabled. It represents a balanced, forward-looking, and coherent approach to strengthening Europe's media ecosystem, and recognises that a resilient media sector depends on the contribution of all actors in the value chain - broadcasters, cinemas, journalists, producers (both affiliated and independent), distributors and other media workers alike. The proposal's openness is its strength, and that strength should not be traded away to serve interests of a few.

Restricting eligibility to "independent" producers would do exactly that. It would narrow AgoraEU's reach, further distort competition, run against the Media Outlook's findings on growing concentration among major production groups¹ and undermine European production. In a transformed landscape where "super indies" already rival or exceed the scale of national broadcasters, rigid ownership-based restrictions do not capture competitive realities.

Beyond these market considerations, excluding broadcasters/audiovisual content providers would also skew the geographic allocation of AgoraEU funds, since in many Member States they are the only local audiovisual actors of measurable scale. Moreover, in markets where media freedom is under pressure, it is often broadcasters/media companies and their journalists who hold the line for independent

¹ See p. 36 and table 3 of the [2025 Media Outlook Report](#), which underline the growing concentration and dominance of major production companies like Mediawan and Banijay, which are much larger than most European broadcasters.

reporting. Excluding them from AgoraEU sits uneasily with the democratic resilience the programme is meant to reinforce

Ultimately, AgoraEU should treat all contributors equitably. All producers, be they independent or affiliated, equally contribute to cultural diversity and pluralism and deserve recognition. Media companies should not be excluded from a programme designed to strengthen Europe's entire audiovisual and media sector. If non-content creators like distributors and exhibitors qualify for the media+ strand, content-creating media companies should too.

We therefore urge you to uphold the Commission's proposal as tabled and to reject amendments introducing 'independent production' restrictions.

Yours sincerely,

ACT - Association of Commercial Television and Video on Demand Services in Europe

ABBRO - Асоциация на българските радио- и телевизионни оператори (АБРО)

ACP - Association des Chaînes Privées

ARCA - Asociația Română de Comunicații Audiovizuale

AKTV - Asociace komerčních televizí

ATVS - Asociácia televíznych vysielateľov Slovenska

CRTV - Confindustria Radio Televisioni

ERL - Eesti Ringhäälingute Liit

Finnmedia - Finnish Media Federation

LRA - Latvijas Raidorganizāciju Asociācija

LRTA - Lietuvos radijo ir televizijos asociacija

KIGEiT - Krajowa Izba Gospodarcza Elektroniki i Telekomunikacji

MEME - Magyar Elektronikus Műsorszolgáltatók Egyesülete

UTECA - Unión Televisiones Comerciales En Abierto

VAUNET - Verband Privater Medien

VÖP - Verband Österreichischer Privatsender

VSPF/ATPS - Verband Schweizer Privat Fernsehen / Association des Télévisions Privées Suisses

ZPPM Lewiatan - Związek Pracodawców Prywatnych Mediów Lewiatan