



# IRELAND

## EurOMo Country Report 2025

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## Introduction

This report reflects the data underlying the Irish element of the Euromedia Ownership Monitor and the risk assessments relating to Irish-based and Irish-facing news media outlets. It seeks to paint a picture of news media ownership and control in Ireland, highlight issues/risks relating to transparency around the ownership and control of those media.

The Republic of Ireland has a small (but rapidly growing) population of approximately 5.5m people as of 2026. As such it constitutes a small media market. However, because English is the primary language spoken on a day-to-day basis, it is also a very porous media market and in television, print and cinema markets, overseas content accounts for anything from one quarter of media consumption (print) to 90% (cinema). (Irish is the other official language of Ireland but fewer than 100,000 people use it on a daily basis (Central Statistics Office, 2023).)

In television, UK- and US-based channels account for just over 50% of channel share of viewing while UK-based newspapers (including editions localised for the Irish market) have accounted for anything from 25% (on a weekday) to 33% (on a Sunday) of print sales (Media Ownership Monitor Ireland, 2023). Such estimates are complicated by the wholesale withdrawal of Irish newspapers from traditional circulation-gathering mechanisms such as the Audit Bureau of Circulation since 2018. However, readership figures captured by Kantar suggest that even as Irish newspaper audiences move online, UK-owned titles continue to play a significant role in the Irish “print” media sector (NewsBrands Ireland/Kantar Media, 30 May 2023).

According to the 2025 Reuters Digital News Report for Ireland, more people used online sources (including social media) as their main source of than any other medium (Lloyd et al, 2025). 77% of those surveyed for the Reuters report in 2025 cited online as their key news source. However, this is a 7% drop from the peak in online news usage in Ireland in 2019 (i.e. before the pandemic), suggesting a broader disengagement from news in general in the post-pandemic era. Television is the next most used news source with 58% of respondents consuming it on a weekly basis, although only 35% of people use it as a main news source. Radio was used by 36% of respondents while 22% recorded printed newspapers as a weekly news source. Notably just 4% of respondents identified printed newspapers as their main weekly news source. The decline in printed paper circulation has engendered aggressive strategies to encourage take-up of digital newspaper subscriptions with Mediahuis Ireland (the Belgian-owned publisher of leading print titles the Irish Independent, Sunday Independent and Sunday World) declaring that it anticipates ceasing printing of newspapers entirely by the early 2030s (Cantillon, 2023).

Offline, the news brands accessed most frequently were a mix of Irish and UK-based outlets. The television news service of the main PSM, RTE, was most accessed (by 44% of respondents), followed by RTE’s radio service (29%). The UK-based Sky news was third most accessed (27%), followed closely the British PSM, the BBC television news service (25%). The Irish-based (but US (Liberty Global)-owned) commercial television station Virgin Media was fifth most accessed offline (22%) followed by local radio stations, the Irish Times, Irish Independent, the national commercial radio stations Today FM and Newstalk (both owned by German media giant Bauer) and finally local newspapers.

According to the 2025 Reuters Digital News Report, locally-based news media are amongst the leading online news brands in Ireland. These include RTE.ie (accessed by 36% of those surveyed for the report), TheJournal.ie (26%), BreakingNews.ie (22%, a digital native outlet owned by The Irish Times), and Irish Independent Online (22%). However, even here, overseas news sources play a role

with BBC News Online, Sky News Online and The Guardian Online respectively occupying the 5th, 7th and 9th spots among the top ten most used online news outlets in Ireland.

We have used these ranking to inform the selection of the sample of outlets on which the Irish EuroMO database is built. However, we have also used broader criteria to include some outlets, the inclusion of which in our sample offers a more rounded and richer picture of the Irish media landscape (even if they are not highlighted in the Reuters report). These include regional newspaper groups like Iconic Press and CMNL, emerging radio groupings such as Bay Broadcasting, groups representing very specific political outlooks (such as Gript.ie), and groups which are part of larger international media conglomerates (such as Onic Audio Limited).

### Main media ownership patterns in Ireland

As Table 1 below illustrates, our sample covers not just the main media groups in Ireland but also a number of smaller but often influential smaller media outlets. This includes both domestic PSM (RTÉ and TG4), the British PSM, the BBC, the de facto commercial monopoly television group Virgin Media Television Ireland, the three largest privately-owned radio groups, Bauer Media Ireland, Onic Audio and Bay Broadcasting, all of the major newspaper groups with national titles (the Irish Times, Mediahuis Ireland, News Corporation, REACH plc, and the Daily Mail and General Trust), the two largest regional newspaper groups (Iconic Press and CMNL), and two of the most influential digital native news outlets, TheJournal.ie and Gript.ie. We also include the platform presences of RTE, Virgin Media, the Irish Times, the Irish Independent, TheJournal.ie and Gript.ie on Facebook, Instagram, Whatsapp, Youtube, X and Tiktok.

**Table1. Main media groups active in news production in Ireland and their outlets which appear in our database sample**

Media Group	Main Owners	Sampled Outlets	Outlet Type
RTÉ (Public Service Media)	Legally ambiguous but effectively 100% owned by the Irish state. Run by government-appointed board and Director-General appointed with government approval	RTÉ 1	Television
		RTÉ Radio 1	Radio
		RTÉ News	News content on VLOPs – Facebook, Youtube, Whatsapp, Instagram, x/Twitter and Tiktok
TG4	Legally unclear but effectively 100% owned by the Irish state. Run by government-appointed board and Director-General appointed with government approval.	TG4	Television
		Virgin Media One	Television

Liberty Global plc (US)  (Operating in Ireland as Virgin Media Group.)	Top individual shareholders are John Malone (30.3%), Michael Fries (10.1%) and Robert Bennett (3.3%). As of January 20-26, approximately 45% of Liberty Global shares are publicly traded on the NASDAQ.	Virgin Media News	News content on VLOPs – Facebook, Youtube, Whatsapp, Instagram, x/Twitter and Tiktok
Heinrich Bauer Verlag KG.  (Operating in Ireland as Bauer Media Audio Ireland LP)	The Bauer Family. Top shareholders are Yvonne Bauer (85%) and her sisters Mirja (5%), Saskia (5%) and Nicola (5%).	Today FM	Radio
		Newstalk 106	Radio
		Red FM	Radio
News Corporation.  (Operating in Ireland as News Ireland and Onic Audio Limited.)	Top shareholders include Keith Rupert Murdoch (40.9%) with the remaining shares publicly traded.	FM104	Radio
		The Irish Sun	Newspaper
British Broadcasting Corporation	As a public corporation, the BBC is legally considered 100% publicly owned. It is managed by a government-appointed board and operates independently of government under a periodically renewed Royal Charter.	BBC 1	Television
Irish Times Designated Activity Company	Irish Times Trust CLG 100%	Irish Times	Newspaper
		Irish Examiner	Newspaper
		Irish Times	News content on VLOPs – Facebook, Youtube, Whatsapp, Instagram, x/Twitter and Tiktok



Mediahuis Ireland	100% owned by Mediahuis which is in turn owned by Mediahuis Partners (50.57%), VP Capital (16.27%) and Concentra (32.31%). Mediahuis' largest private shareholders include the Belgian Baert Family (29.5%) via their 90% ownership Concentra, the Dutch van Puijenbroek family (16.7%) via their 100% ownership of VP Exploitatie, and the Belgian Thomas Leysen (13.25%) via his 26.5.% ownership of Mediahuis Partners NV.	Irish Independent	Newspaper
		The Herald	Newspaper
		The Sunday Independent	Newspaper
		Irish Independent	News content on VLOPs – Facebook, Youtube, Whatsapp, Instagram, x/Twitter and Tiktok
REACH plc	100% of REACH plc's share are listed on the London Stock Exchange. Ownership by institutional investors (e.g. Lombard Odier Asset Management and M&G plc) means that in practice most REACH plc shares are regarded as free-floating.	Irish Daily Star	Newspaper
Daily Mail and General Trust	100% owned by Rothermere Continuation Trust which appears to be 100% controlled by Jonathan Harmsworth (4 <sup>th</sup> Viscount Rothermere).	Irish Daily Mail	Newspaper
Bay Broadcasting	Jointly owned by Kevin Brannigan (50%) and Mike Ormonde (50%) , the latter through his Step Investments vehicle.	Classic Hits FM	Local Radio

Media Concierge Holdings Limited  (Operating in Ireland as Iconic Newspapers Limited)	Owned by the Denmark family: Malcolm Denmark (75.24%), C.N. Denmark (15%), T.C. Denmark (9%), V.M. Denmark ( 0.76%)	Connacht Tribune	Local/Regional Newspapers
		Leinster Leader	
Celtic Media News Limited (CMNL)	Main shareholder is Frank Mulrennan (64.3%) with remaining shares held by ten others with sub-5% shareholdings.	The Anglo-Celt	Local/Regional Newspapers
DML Capital Unlimited Company	The Fallon brothers, Eamon and Brian each own 50% of DML Capital	TheJournal.ie	Digital Native news outlet
		TheJournal.ie	News content on VLOPs – Facebook, Youtube, Whatsapp, Instagram, x/Twitter and Tiktok
Gript Media Limited	Evelyn Porter (50%) and Niamh Ní Bhrian (50%) are identified as co-owners.	Gript.ie	Digital Native news outlet
			TheJournal.ie

Perhaps the most notable feature of this list is the extent to which Irish media outlets are foreign-owned. With the exception of the two PSM and the Irish Times, all of the leading players in the television, radio and print markets are headquartered overseas. The US-owned Virgin Media Television Ireland is the only Irish-based commercial television operation and, by share of audience, Sky Television (also US) and the BBC (UK) occupy the third and fourth positions in the Irish television market. The commercial radio market has been dominated by German (Bauer) and American (News Corporation’s Onic Audio) companies although with the Irish-based Bay Broadcasting’s recent acquisition of Galway Bay FM, it may now have a slightly larger audience share than Onic. In print media, the largest player by circulation/readership, Mediahuis Ireland is owned by a Belgian parent whilst the other national papers are owned by UK (REACH plc and Daily Mail and General Trust) and US (News Ireland) firms. Even in the regional market, the market leader, Iconic Press is a subsidiary of a UK based advertising sales agency with the Belgian-owned Mediahuis Ireland again being the

second largest player in this market. The largest Irish player in the regional newspaper market – CMNL- has just six titles against the 15-plus print titles (and 20 plus digital titles) owned by Iconic and the eleven owned by Mediahuis. Both digital native outlets in the sample remain Irish-owned (although TheJournal.ie’s owners apparently entered talks with Mediahuis Ireland to acquire TheJournal.ie (and its associated brands) in 2024.

(In passing we would also note that this pattern extends into the On-demand audiovisual media services and VLOPs markets. Netflix, Disney+ and Amazon Prime Video (all US-owned) are the leading streaming services in Ireland and although both RTE and Virgin Media offer on-demand services for their content, there is no standalone Irish service to compare to the streamers. Ireland is also home to the European Headquarters of most of the major online platforms which, as a consequence fall under the regulatory authority of Coimisiun na Mean. These include: Meta’s platforms, Facebook, Instagram and – sine January 2026 – Whatsapp Channels; Google’s various Services including YouTube, Google Play; LinkedIn; TikTok; X (formerly Twitter); Pinterest; and Shein. Again the main headquarters of ALL of these VLOPS are located outside Ireland.)

### **Key Transparency issues 1. Overseas ownership.**

Where ownership is located is not trivial. It may not directly have impact on content, although it is unquestionably the case in the Irish versions of papers sold by News Ireland, REACH plc and the Daily Mail and General Trust extensively feature content from their UK editions. And, it need hardly be stated that BBC content is entirely produced with the UK market in mind so their schedule does not include and news/current affairs material for Ireland.

However, overseas ownership is also significant from the perspective of this research because it complicates the process of tracing ultimate ownership. Although local researchers are familiar with local registers which include information on shareholdings in media outlets, tracing beneficial ownership for media companies headquartered outside Ireland – which account for most of our sample - means having to access registers outside beyond Ireland. So, in the case of Irish-based companies like the Irish Times, Bay Broadcasting and CMNL, establishing beneficial ownership is relatively easy. But, this is not always true when the chain of ownership extends beyond Ireland.

In the case of PLCs such as Liberty Global, News Corporation and REACH, this ownership information is relatively straightforward to access as it is recorded in publicly available documents such as annual reports prepared for company AGMs or, in the US, the proxy statements filed to the US Securities and Exchange Commission in association with Form-10K filings. (Against that the inherently free-floating nature of shares in PLCs makes it impossible to definitively identify 100% of share ownership.)

However, in other cases definitively establishing beneficial ownership can be very difficult. A case in point is the Irish Daily Mail which is owned by the Daily Mail and General Trust. Previously a PLC, the company was taken private by the Rothermere Family (led by Jonathan Harmsworth) in 2022 using Rothermere Continuation Limited, a Jersey-based company as an acquisition vehicle. Rothermere Continuation Limited is in turn owned by a number of other companies – including Harmsworth Trust Company (PTC) Limited and Crestbrook Associates (PTC) Limited – which are based in the British Virgin Islands. As a consequence, establishing beneficial ownership of the Irish Daily Mail requires access to the Irish Companies Record Office, Companies House in the UK, the Jersey Financial Services Commission Companies Registry and the Registry of Corporate Affairs at BVI Financial Services Commission. Navigating such registries often requires specialised knowledge and can be sufficiently costly to deter in-depth exploration of ownership. (In this regard

it should be noted that Companies House is unusual in that it general makes company filings available free-of-charge.

The Irish Daily Mail may be an extreme example but even in cases where we have arrived at fairly definitive identifications of beneficial ownership such as Mediahuis and Heinrich Bauer Verlag KG, doing so required active collaboration with other teams in the EuroMO 2025 project (in Belgium and Germany).

There is a further consequence of the extent of oversea ownership of Irish media outlets: it limits our understanding of the nature and scale of Irish media markets in financial terms. The parent companies of media outlets operating in Ireland do not always disaggregate the reporting of their revenues and profits by national market. In consequence, not only is it impossible to know the market share by revenue of individual media outlets in Ireland but we cannot confidently build a picture of the total value of those markets.

Some overseas-owned outlets – Virgin Media Television Ireland, Associated Newspapers (Ireland) (the direct owner of the Irish Daily Mail), and the News Corporation owned Onic Audio Limited (direct owner of FM104) – do file stand-alone company accounts with the Irish Companies Records Office. However, Bauer Media Audio Ireland’s Irish filings do not include revenue figures, nor do other News Corporation outlets (such as the newspaper operation). Mediahuis includes a single overall revenue figure for the Irish operation in their annual report but this does not distinguish between different elements of the Mediahuis Ireland operation, some of which are not directly related to media outlets. In consequence it is impossible to isolate revenues from, for example, print circulation, online subscriptions and advertising related to Mediahuis Ireland’s newspapers.

(For clarity, we should acknowledge that even if a firm is based in Ireland such data may not be available. Thus, although at one level the Irish Times appears to be actively transparent regarding its finances – making annual reports available online a click or two away from its home page – it also presents a single revenue figure which makes it impossible to separate out the finances of its newspaper operations from other activities such a property and death notice websites. Furthermore, Irish company law exempts small firms (sub-€15m turnover) from having to declare their income so we cannot know the revenues of Bay Broadcasting, CMNL, DML Capital, Gript Limited etc.)

This lack of useful data related to market share is also a feature of the operations of online platforms in Ireland. The picture here is distorted by the fact that online platforms which base their European (and/or European, Middle Eastern and African) operations in Ireland, ascribe revenues from ALL these markets to the Irish operation. For example, Meta Platforms Ireland Limited, owner of Facebook, Instagram and Whatsapp, reported revenues of €85.29 bn in 2024 (Deegan, 2025), substantively all of which was earned from third party advertising. Google Ireland Limited reported similar revenues – of €86.6bn – in the same year (Dooley, 2025). To place these figures in context, even most extravagant estimates of the total value of the Irish advertising market (across all media) for 2024 come in at around €1.3 – €1.6bn. IAB Ireland estimate that the digital advertising market alone in Ireland was worth €1.06bn in 2024. It is generally accepted that Meta and Google account for about 85% of these Irish digital revenues but there is no publicly available reliable source for these “guesstimates”. Regardless, it is clear that company accounts of tech giants in Ireland cannot be used as a basis for estimating their revenues or market share.

## **Key Transparency issues 2. EMFA Article 5 and Irish PSM**

With regard to the PSM, although the various broadcasting acts passed since the 1926 Wireless Telegraphy Act are curiously silent with regard to who or what specifically owns Ireland's two PSM (RTÉ and TG4) organisations, there is a general understanding that although owned by the state, the two PSM operate at an arms-length from direct state influence with day-to-day responsibility for their operation vested in government-appointed boards.

However the manner in which the PSM boards are appointed and in which they are funded raises concerns in the light of Article 5(2) and Article 5(3) of EMFA are or will be implemented in Ireland.

Article 5 (2) states that "Member States shall ensure that the procedures for the appointment and the dismissal of the head of management or the members of the management board of public service media providers aim to guarantee the independence of public service media providers." However, in terms of the PSM, the Irish government is intimately involved in appointment of the boards of both by statute. Both boards have 12 people appointed for not more than two five-year terms. According to the 2009 Broadcasting Act (as amended), six of the twelve are "appointed by the Government on the nomination of the Minister [for Media]". This concentration of appointment power in a single government minister is somewhat diluted by the fact that a further four board members are nominated by a Joint Parliamentary Committee (including representatives from a range of political parties). In general these nominations are accepted but strictly speaking it is at the discretion of the Minister whether to do so or not. Section 81(d) of the 2009 Act allows the Minister to disregard the Committee nominations and to nominate "as he or she sees fit other persons or another person". (The other two board positions are filled by the PSM Director-General and an elected staff representative.)

Once appointed, the government has less scope to effect dismissals of the board which can only occur if both Houses of the Irish Parliament passed resolutions to that effect. This requirement is restated in sections 10(5) and 84(6) of the Broadcasting Act 2009 and applies to the Boards of both RTÉ and TG4.

Furthermore, at time of writing (January 2026), although the Director-Generals of RTE and TG4 are appointed by the respective boards of both organisations, both appointments are subject to Ministerial consent.

As of January 2026, new legislation is in the process of being drawn up which would reduce political influence from the appointment of the Director-General position. In October 2025, the Irish government published a General Scheme for a Broadcasting (Amendment) Bill. At time of writing (January 2026) it remains subject to pre-legislative scrutiny and there is no definitive timeline for when it will be redrafted as a Bill. Section 89B of the General Scheme states that the director general of both the Directors General of RTÉ and TG4 "shall be appointed by the board of a corporation", thus ending the current situation whereby the consent of the Government is also required. Some state influence is retained, however, as Section 89C states that a director general shall "hold office on such terms and conditions as may be determined by the board of a corporation with the approval of the Minister [for Tourism, Culture, Arts, Gaeltacht, Sport and Media] given with the consent of the Minister for Public Expenditure, NDP Delivery and Reform."

It should also be noted, however, that this is as far as the Broadcasting (Amendment) Bill looks set to go. In the UK, the Media Reform Coalition has proposed removing government patronage from BBC Board appointments and devolving the process to audience councils, while ensuring that both work and regional representation are included on the board. However, the Broadcasting (Amendment) Bill as currently presented makes no reference at all to the appointments process for

the Board of the PSM, essentially leaving it entirely under government control (Media Reform Coalition, 2024).

Recent appointment procedures raise concerns in this regard. The current RTÉ Chairperson, Terence O'Rourke, was appointed in March 2024. Official guidelines on appointments to state boards state that such positions must be openly advertised, meet specific criteria deemed relevant by the minister (in this case the then Minister for Media, Catherine Martin) and be processed by way of a transparent system implemented by the Public Appointments Service. (These guidelines were introduced in 2016 in the wake of a public controversy surrounding the appointment of a Fine Gael senatorial candidate to the board of the Irish Museum of Modern Arts by a Fine Gael Arts minister in what was widely seen as a move to improve his prospects of securing a seat in the Irish Senate.)

O'Rourke was appointed Chairperson at the same time as two new ordinary board members, both of whom went through the standard Public Appointments Service system. However, with regard to O'Rourke appointment as chairperson, the Minister opted to bypass the Public Appointments Service and instead brought O'Rourke's name directly to cabinet for approval (O'Connell, 2024). There is nothing technically illegal in this: the guidelines do permit this in circumstances where "the minister has independently identified a person who is evidently and objectively highly qualified and capable of effectively discharging the role of chair of a state board and who has not otherwise applied". Nonetheless such direct role on the part of a serving minister clearly goes well beyond merely "influencing" the appointment.

Given this, and although we are not suggesting that O'Rourke was an inappropriate candidate, it illustrates the power of the government to appointment preferred candidates without external scrutiny. (In passing we should also note that, in practice, PSM appointments have not been characterised by overt political favouritism but it remains a concern that there is technically little to prevent this.)

Article 5(3) of EMFA states that "Member States shall ensure that funding procedures for public service media providers are based on transparent and objective criteria laid down in advance. Those funding procedures shall guarantee that public service media providers have adequate, sustainable and predictable financial resources corresponding to the fulfilment of and the capacity to develop within their public service remit. Those financial resources shall be such that the editorial independence of public service media providers is safeguarded.

Section 123 (1) of the Broadcasting Act 2009 states that RTÉ shall receive "an amount equal to the total of the receipts in that year in respect of television licence fees" (minus funds granted to the Broadcasting Authority of Ireland for its Sound and Vision production funding scheme) from the Minister for Communications. With regard to the second PSM, TG4, Section 123 (4) states that "The Minister, with the consent of the Minister for Finance, may from time to time, pay to TG4 such an amount as he or she determines to be reasonable for the purposes of defraying the expenses incurred by TG4 in pursuing its public service objects. This confirms the long-standing method of transferring public funds to RTÉ and TG4. Both broadcasters are dual-funded relying on a mix of public (licence fee and direct exchequer funding) and commercial (advertising and some programme sales) income. Although TG4's reliance on direct exchequer funding means that there is substantial scope for the state to determine the level of funding made available to that station, RTE's reliance on a licence fee appears to constitute a more independent source of revenue, offering a transparent and objective means of determining how much RTÉ money can receive from public funds.

"Transparent and objective" does not guarantee that such funds are sufficient to cover the cost of delivering the PSM mission. And, while there might be debates within Ireland as to what that PSM mission consists of (limited to addressing market failure or a much more comprehensive service), it is abundantly clear that RTE in particular has been operating through an ongoing financial crisis since 2008.

Part of RTE's financial woes stems from the fact that the licence fee is set by the government. In theory, since 2002, RTÉ has been able to seek annual increases in the level of the broadcast licence fee in line with the overall rate of inflation "subject to the strict monitoring of performance against financial, management and programming targets." Section 124 of the Broadcasting Act 2009 tied increases in the Licence Fee to the Consumer Price Index conditional on the outcome of annual reviews conducted by the Broadcasting Authority of Ireland (since superseded by Coimisiún na Meán) of the adequacy of RTÉ and TG4's funding as it relates to meeting their public service objects. These reviews were to form the basis of decisions about the licence fee level which financed RTE and the funding made available to TG4.

In July 2013, the BAI published recommendations regarding required levels of funding for the public service broadcasters (PSBs), TG4 and RTÉ, between 2013 and 2018. Although those recommendations did not envisage an immediate increase in licence fee funding, the BAI did acknowledge that an increase in public funding would be required for RTÉ over the 2013-18 period. However, as of 2017, the government had consistently refused to grant an increase in the cost of the domestic television licence fee, the main source of RTÉ's non-commercial income. It must be emphasised here that the BAI's role in this regard was entirely advisory and that the BAI itself did not have the authority to either grant increased levels of public funding to the PSMs or to determine the level of the broadcast licence fee.

In their June 2018 submission to the Minister for Communication, the BAI recommended immediate annual revenue increases of €30m and €6m for RTÉ and TG4 respectively based on a BAI-commissioned independent review of Public Service Broadcasting. In practice Budget 2019 (published by the Minister for Finance in December 2018) committed to an €8.6m increase for RTÉ and just €443,000 for TG4.

In their 2018 Five Year Review of the Funding of Public Service Broadcasting document the BAI noted that "Notwithstanding the positive recommendations made by the BAI to the Minister in respect of adjustments in public funding for the PSBs arising from the Annual Reviews, these recommendations have not always been acted upon - particularly in the case of RTÉ. Given the wider economic context within which these recommendations were made, the BAI wishes to express its concern on this matter, especially given the increasing range of challenges being faced by the PSBs and the impact such challenges have for the services and content available to Irish audiences." (Broadcasting Authority of Ireland, 2018). Since 2017 there have been a number of official investigations into the appropriateness of PSM funding mechanisms. In 2017 the Joint Committee on Communications, Climate Action and Environment recommended that the licence fee be replaced with "a non-device dependent public service broadcasting charge (household-based" and that the level of that charge should be licence fee be "reviewed two years in light of the Consumer Price Index (CPI)" thus introducing a more "automatic" dimension into determining the precise level of PSM funding (Joint Committee on Communications, Climate Action and Environment, 2017).

In September 2020 the state-appointed Future of Media Commission concluded that the licence was no longer a reliable basis on which to fund the main PSM. Describing RTÉ as "forever preoccupied with operational adjustments and cost containment measures to mitigate the impact of short-term revenue fluctuations, at the expense of long-term strategic planning, investment and organisational

innovation" the report strongly recommended to an entirely new direct exchequer-supported funding system (Future of Media Commission, 2021). Overall the Commission made 50 recommendations addressing various aspects of the Irish media eco-system. 49 were accepted by the government. The glaring exception to this related to RTE's funding model: the government decided to retain the current licence-fee based model.

This is all the more remarkable given that the period since 2023 has provided a sustained illustration of the consequences of RTE's reliance on an outmoded revenue model as broadcast licence fee receipts collapsed in the wake of public anger over a perception that RTÉ had misled the public regarding payments to its then highest profile presenter. By Autumn 2023, RTE estimated that they would lose in the region of €63m in licence fee revenues over the course of 2023 and 2024. In consequence, simply to avoid an RTE bankruptcy, the state was forced to commit to transferring €56m in three tranches over 2023 and 2024 simply to keep RTE solvent.

In August 2024 the then Minister for Media announced that, between 2025 and 2027, RTE would be funded by a combination of direct exchequer funding, an unreformed broadcast licence fee and commercial revenue. The state committed €725m to RTE over the 2025-2027 period. €225m in 2025, €240m in 2026 and €260m in 2027. It was anticipated that the bulk of these revenues would come from the licence fee with the rest made up by the exchequer.

On one level the €725m figure suggested considerable largesse on the part of the state. The point was also made that the three-year commitment offered RTE greater certainty of funding than at any previous time in its history.

Such framing ignores the fact that under "normal" circumstances, RTE might have expected to receive €600m in "state funding" (from the licence fee). The second is that the "commitment" is largely rhetorical. National budgets are drawn up annually so it remains within the gift of the government to determine whether or not public funding at the levels promised to RTE in 2024 are actually provided.

However, the larger objection is that the €725m figure does not appear to have been arrived at on any objective basis. No assessment of what RTE should do as a public service broadcaster in the 2025 - 2027 period was drawn up or costed. In effect then, the €725m figure was arrived at arbitrarily. Furthermore that figure assumes that RTE's commercial revenues – which as of 2024 account for 43% of the station's total revenues - will remain stable. Having more or less consistently declined since 2008, the basis for that assumption is not clear.

In effect, the state has created a situation whereby RTE will be directly dependent on state funding at a critical juncture in its century-long existence. This is not to suggest that any government is likely to exploit that dependency relationship as a means of directly influencing RTE editorial content. Nonetheless, the adoption of the hybrid funding model, at the very least creates the potential for that kind of influence. And, the new funding model explicitly conditional on RTÉ implementation of "reforms" which would hinder its programming-making capacity: reducing headcount by 400 and moving production of flagship programmes away from the RTE campus in Dublin.

Again the General Scheme for a Broadcasting (Amendment) Bill referred to above notionally addresses these concerns by altering the manner in which the adequacy of PSM public funding is determined. Previously, Coimisiún na Meán (and its predecessor the Broadcasting Authority of Ireland) carried out a review of public funding adequacy at five year intervals. The GS envisages the frequency of this changing to every 3 years "in accordance with a methodology published by Coimisiún na Meán". In so doing, the GS envisages Coimisiún na Meán setting out performance commitments and outputs and associated indicators and metrics of RTÉ and TG4 for a 3-year

period, on the basis of submissions made by both PSM. And, on that basis, the GS states that Coimisiún na Meán will make a recommendation to the Minister on the appropriate public funding level for RTÉ and TG4 for each year of the 3-year period. In the abstract this appears to suggest that there will be robust, objective and independent processes in place to ensure the adequacy of PSM funding. However, the GS does not oblige the Government of the day to accept Coimisiún na Meán recommendations in this regard. Section 112a (8) of the GSW simply state that “The Government shall publish a response to the recommendation of the Commission”. In this regard two things are worth considering: firstly, Coimisiún na Meán’s predecessor routinely recommended increase in public funding to both PSM during the 2010s. These recommendations were – at best – only ever partially accepted by successive governments. No government ever granted the amount recommended. Secondly, the most recent (2024) published level of PSM public funding has been represented as offering the PSM a stable basis on which to carry out their public service functions. In this regard it is important to understand that, in real terms, the public element of, for example, RTÉ’s funding has declined by 33% between 2008 and 2024.

In summary then, the media laws as extant and as proposed do prescribe transparent procedures to provide funding for the PSBs. However, notwithstanding the requirement to commission research from the Media Regulator as to the adequacy of this funding in relation to the fulfilment of the Public Service mission, the fact that the state is not legally obliged to accept this advice (and, indeed, has more often than not ignored that advice) means that the media law as presently state cannot ensure that the funding is adequate. The matter is complicated by the fact that since 2024 there is a disconnect between what the media law identifies as the funding sources for RTE in particular (licence fee revenue and advertising income) and actual practice which sees licence fee and advertising topped up for direct exchequer funding (the levels of which do not appear to be based on any publicly available formula)

### **Key Transparency issues 3. Transparency of social media news accounts**

Our sample includes 33 news VLOP accounts from Irish news outlets. All of the these were related to just six news outlets: RTÉ, Virgin Media News, the Irish Times, the Irish Independent, TheJournal.ie and Gript.ie disseminating news content on Facebook, Youtube, Whatsapp, Instagram, X and Tiktok. In 4 cases – RTE, Irish Times, Irish Independent and Gript.ie - direct ownership data was available within two clicks of the news outlets platform account. In the other two cases, the information was available, via a freely accessible public resource.

Information on how VLOP personalisation algorithms work to curate individual news feeds is available at two levels, VLOPs generally provide abstract information regarding the principles underlying their algorithms via their help centres. For more user-specific information, it is usually possible to interrogate individual posts on user feeds. For example, on Facebook, clicking the three dots (...) on a post allows the user to select the “Why am I seeing this post?” query. The response typically reveals signals like: the user is follow that person/page; their friends interacted with it; the user has previously engaged with similar content or simply; the content is popular in their network. This does not reveal the details of the algorithm, but it alert users as to which signals triggered ranking of content.

Article 14(4) of the Digital Services Act (DSA) requires that online platforms should moderate content carefully, impartially, and only as much as necessary, balancing the rights and interests of all those affected by their decisions. In other words, notwithstanding the need to protect online platform users against harmful content, the DSA also recognises the role played by online

communication in the operation of the Public Sphere and emphasizes the need to balance protections against online harm with protections for the freedom of expression.

Under the DSA, very large online platforms (VLOPs) must publish annual transparency reports covering their content moderation and other obligations (e.g., notice & action processes, appeals mechanisms, numbers of removals, risk mitigation, advertising transparency, etc.). These reports are a legal requirement under the DSA (Articles 15 and 24) and must be made public.

However, the manner in which VLOPs present their transparency reports, makes it more or less impossible to assess the extent to which VLOPs moderate content with specific respect to freedom of expression in Ireland.

For example, the reports filed for Facebook, Instagram, Tiktok and LinkedIn under the DSA do not separate national content moderation practices but rather cover the entire EU/EEA region for Facebook and Instagram separately. These reports do include data such as:

- the number of pieces of content removed or restricted,
- notice & action reporting statistics,
- appeals data,
- handling of illegal content,
- researcher access measures set up under Article 40.

But this is reported using a regional EU reporting format, not a country-by-country breakdown. There is some country-specific data contained in the transparency reports from X and Snapchat but even here the data is only partial and certainly insufficient to make an informed judgement regarding content moderation practices.

In theory, the EU's DSA Transparency Database permits a national breakdown of statements of reasons for content moderation. However, in practice, we have been consistently unable to use the database due to 414 errors (relating to too much traffic or configuration errors). Even, bearing this in mind, the Database is, of its nature, largely descriptive and – again - it is hard to see how it might inform an objective, meaningful assessment of content moderation practices.

Given this, what might inform such a judgement? We note that in October 2025, the European Commission preliminarily found that both Instagram and Facebook, were in breach of their obligations to allow users to effectively challenge content moderation decisions. The Commission found that the decision appeal mechanisms of both Facebook and Instagram did not allow users to provide explanations or supporting evidence to substantiate their appeals, making it difficult for users to explain why they disagree with Meta's content decision. Such restrictions might be regarded as inhibiting freedom of expression.

In November 2025 Coimisiún na Meán begun an investigation into the social media platform X arising from regarding X's compliance with Article 20 of the Digital Services Act which requires online platforms to implement an internal complaint handling system for users to appeal platform decisions about their content or account (Slater, 2025). Part of the investigation is exploring the extent to which users are properly informed of the outcome of a report they make and whether they are informed about their right to appeal the decision. More broadly the investigation is examining the extent to which X's internal complaints-handling mechanism is easy to access and user friendly.

Interim figures from Irish ACE (Appeals Centre Europe) published in October 2025, found that three-quarters of the 1,500 appeals received between November 2024 and October 2024 came from Facebook users (ACE, 2025). ACE stated that in more than half of their decisions relating to Facebook content, they overturned Meta's original decision to leave up or take down the content.

This may point to threats to freedom of expression from content moderation but it is important to place this in context: ACE overturned 77 out of 141 Facebook decisions assessed. However, the DSA Transparency Dashboard suggests that, in the same period, Facebook made 545 million content moderation interventions. As such, the ACE interventions represent a tiny fraction of overall content moderation activity.

In sum, we do not feel that there is sufficient data available to be able to adequately address this question. However, since this lack of data constitutes a risk in and of itself, we have selected a "medium" risk coding here.

#### **Key Transparency issues 4. Allocation of state advertising**

The question of how state advertising is distributed amongst media outlets in Ireland has long been a cause for concern. The placement of print advertising is subject to a mix of standard Irish and EU public procurement rules. However, this does not necessarily mean that there are fair and transparent rules on the distribution of advertising. Although there is an open (and heavily rule-bound) tender process to become the institution which takes responsibility for placing print advertisements on behalf of Irish public bodies, once that tender has been won, the rules on the placement of individual advertisements are completely unclear. In practice it appears that individual public bodies can determine where ads are placed but there are no publicly available rules on how this process operates. Nor is any data collected in this regard.

However, some progress has begun with regard to the transposition of EMFA requirements relating to state advertising. On 2 July 2025, the Government approved the General Scheme of a Media Regulation Bill designed to implement elements of the European Media Freedom Act (EMFA) into Irish law. This includes enhanced rules on media mergers and transparency of state advertising.

The General Scheme definition of "public authority or entity" has been adapted from the EMFA definition to provide clarity on its meaning in an Irish context. EMFA defines a "public authority or entity" to mean "a national or subnational government, a regulatory authority or body, or an entity controlled, directly or indirectly, by a national or subnational government." The proposed definition draws on the definitions of a "public body" under the Irish Freedom of Information and Protected Disclosures Acts, both from 2014.

Head 22 of the GS outlines principles for the awarding of state advertising and supply or service contracts. It provides that: (1) Public authorities shall ensure that expenditure on state advertising is distributed to a variety of different media service providers.

Head 23 of the GS outlines plans for compliance with the principles established in Article 25(1) of the European Media Freedom Act. It states that in preparing such plans, public authorities will publish the procedures and criteria to be applied in awarding state advertising or supply or service contracts to media service providers or providers of online platforms.

Head 24 provides that public authorities must publish their website: the legal names of the media service providers or the providers of online platforms from which services were purchased; the legal names of the business groups of which any media service providers or providers of online platforms referred to are part of; and the total annual amount spent and the annual amounts spent per media service provider or provider of an online platform.

Head 25 refers to the monitoring of state advertising expenditure. It provides that:

- Coimisiún na Meán shall monitor and report annually on state advertising expenditure based on the information listed in Head 24.
- Coimisiún na Meán may publish in its annual report, the name of any public authority or entity which has failed to publish the information required under Head 24.

In summary, assuming that these measures are actually incorporated into the text of a Media Regulation Bill and passed by the Irish parliament, it appears that a considerable degree of transparency regarding the allocation of state advertising will be introduced. However, the Media Regulation Bill is not expected to pass until the second half of 2026 and, at best it will be 2027 before routinised collection and collation of data on state spending actually commences.

### **The legal and practical basis for media ownership transparency in Ireland**

The passage of the European Media Freedom Act (and, as an EU regulation, its direct transposition into Irish law in February 2025 via Statutory Instrument No. 22/2025 – European Union (Media Freedom Act) Regulations 2025) means that, theoretically there are now strong regulations guaranteeing transparency of media ownership in Ireland.

Preamble 32 of EMFA states that is “necessary to introduce common information requirements for media service providers across the Union. Those requirements should include proportionate and targeted requirements that media service providers disclose relevant information on their ownership and the advertising revenues received from public authorities or entities. Such information is necessary so that the recipients of media services can understand and are able to enquire about potential conflicts of interest, including where media owners are politically exposed, as a precondition for their ability to assess the reliability of the information they receive.”

This logic is reflected in Article of 6 of EMFA on the duties of media service providers. Section 6.1 states that “Media service providers shall make easily and directly accessible to the recipients of their services up-to-date information on... the name or names of their direct or indirect owner or owners with shareholdings enabling them to exercise influence on the operation and strategic decision making”. Section 6.2 states that “Member States shall entrust national regulatory authorities or bodies or other competent authorities or bodies with the development of national media ownership databases”.

However, in reality, at the time of writing (January 2026), the facts on the ground in Ireland regarding transparency mechanisms are in flux. The General Scheme (GS) of a new Media Regulation Amendment Bill which, inter alia, introduces media ownership transparency regulations was published in July 2025. However, as of now, the Bill has not proceeded beyond general scheme status which means it cannot yet be regarded even as a full draft of a Bill. Rather it is a precursor to a draft and it seems unlikely that legislation will actually be passed by the Irish parliament before 2027. We discuss the likely contents of this putative legislation below but, for now the legal situation remains as it has for more than a decade.

Hitherto, the main legislation regarding media ownership has been the Competition and Consumer Protection Act 2014. Section 28M of the Competition Act, 2002 (as inserted by section 74 of the Competition and Consumer Protection Act 2014) requires Coimisiún na Meán (and previously the Broadcasting Authority of Ireland) to prepare a report describing the ownership and control arrangements for undertakings carrying on a media business in the State. Section 28A(1)(b) of the 2002 Act (again as amended by S74 of the 2014 Act) defines “media businesses” as the business of: “(a) the publication of newspapers or periodicals consisting substantially of news and comment

on current affairs, including the publication of such newspapers or periodicals on the internet, (b) transmitting, re-transmitting or relaying a broadcasting service, (c) providing any programme material consisting substantially of news and comment on current affairs to a broadcasting service, or (d) making available on an electronic communications network any written, audio-visual or photographic material, consisting substantially of news and comment on current affairs, that is under the editorial control of the undertaking making available such material". In effect, then, there is a requirement to prepare a report on media ownership which covers both online and legacy media.

The first of these ownership reports was to be completed with a year of the passage of the 2014 Act and the BAI was thereafter required to do follow-up reports at three year intervals. Section 28M(2)-(3) required the Minister for Communications to make the report available to the Irish parliament as to publish it on the internet "as soon as practicable." To date then there have been three such reports published, one relating to the 2012-2015 period, a second relating to 2015-2017 and a third covering 2018-2020. Though comprehensive in their scope, the publication of these reports has often been delayed. The second report was not published until January 2019 while the third report despite having apparently been completed in 2021, was not published until 2024, four years after the period it described has elapsed. As such though a positive move towards ownership transparency, these reports have often been quite out of date even before they have been published.

Furthermore, strictly speaking the 2014 Act does not require media undertakings to disclose their ownership details: it simply assumes that such information will be available to Coimisiún na Meán or to whichever company is subcontracted to carry out the research. Until 2016, there was no requirement under Irish company law for any company, either public or private, media-related or otherwise, to disclose who held the beneficial interest in shares. Every company was obliged to maintain a register of shareholders under company law and members of the public had the right to request sight of same. However those registers contained the name of the entity who held legal rather than beneficial interests in the shares.

However, in November 2016, the European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2016 (SI No 560 of 2016) were published. They require all Irish companies to obtain and maintain accurate information in respect of their beneficial owners and to put a beneficial ownership register in place. In effect this means private companies must maintain a register of substantial interests (expected to mean 25% of shares or more) in the shares of a company. This register is available from the Irish Companies Records Office. The Regulations partially implemented Directive (EU) 2015/849 of the European Parliament and of the Council, of 20 May 2015, on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (the Fourth Anti-Money Laundering Directive ("4AMLD")). Implementation was completed by Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2018, which amended the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, and which came into effect in November 2018.

As of December 2019 nearly 70% of relevant companies had registered their beneficial ownership details with the RBO. Access to the RBO is not universal. "Tier One" entities (including An Garda Síochána, the Financial Intelligence Unit (FIU) Ireland, the Revenue Commissioners, the Criminal Assets Bureau (CAB), the Central Bank of Ireland, the Department of Justice & Equality, the Property Services Regulatory Authority (PSRA), the Law Society of Ireland and the General Council of the Bar of Ireland.) had unrestricted access. The access of those in "Tier Two" (including the general public) was more restricted access but still permitted access to the name, Month and Year of birth, Nationality and Country of residence of a beneficial owner. Tier two also includes a statement of the nature and extent of the beneficial interest held or control exercised.

The issue (and access to the RBO) was complicated by November 2022, the Court of Justice of the European Union (CJEU) decision relating to how the 5th Anti-Money Laundering directive permitted access to the RBO's maintained by Member States (and in Ireland by the Companies Records Office.) The CJEU decided that amendments in 5AMLD infringe the right to protection of personal data, as protected by Articles 7 and 8 of the Charter of Fundamental Rights of the European Union. In effect then the CJEU decision struck down unrestricted access to beneficial ownership information on RBO.

However, in August 2020, the Broadcasting Authority of Ireland (now Coimisiún na Meán) in conjunction with the School of Communications at Dublin City University launched "mediaownership.ie," a publicly accessible database of print, broadcast and online media ownership allowing users to identify ownership (by Global Ultimate Owner) of over 160 media outlets operating in the Irish market. Thus although national law still does not technically require disclosure of ownership details, in practice this data is now generally available. As of 2026, the database contains data on 204 Irish or Irish-facing media outlets and Coimisiún na Meán has committed to support the project until at least 2028.

Furthermore, in 2024, Coimisiún na Meán began supporting a parallel online data source, the Media Ownership Monitor Ireland (MOM Ireland) which was prepared by the School of Communications at Dublin City University in partnership with the Global Media Registry civil society organisation. (For reasons of our own transparency, we should acknowledge that the authors of this report are also involved in the preparation of MOM Ireland.) The first iteration of MOM Ireland was launched in February 2024 and included ownership profiles – at company and individual level – for the 50 most prominent (in terms of audience, revenues and public impact) media outlets in Ireland. At time of writing, preparation of a second iteration adding a further 50 plus titles is under way. MOM Ireland is distinct from the database-style presentation of mediaownership.ie in that its profiles identify how/whether individual media outlets are associated with "politically connected" individuals, thus offering a more nuanced sense of how external influences might shape the editorial content of specific media outlets.

In sum, there is something of a gap between the legal requirements regarding media ownership transparency in Ireland and actual practice. That is, there is no requirement to disclosure direct, indirect or beneficial ownership. There is no requirement obliging media owners to disclose if they hold political office or obliging media outlets to disclose foreign beneficial ownership to the public information. However in practice, most if not all of this information has been publicly available since 2020. Looking at the 23 outlets in our sample, all but six identified their direct owners on or within two mouse-clicks of their website home page. However, reflecting the existence of mediaownership.ie and MOM Ireland, the beneficial owners of all 23 were coded as, at worst, explicitly designated in an official source (with some available directly via the media outlets own website).

As such, although the Irish legal context fell short (and technically continues to fall short) of EMFA standards regarding transparency of media ownership, actual practice in Ireland effectively anticipated most of Article 6 of EMFA. It was notable that the Public Consultation on the transposition of elements of EMFA into Irish law, carried out by the Department of in Autumn 2024 appeared to regard Article 6 as non-controversial so there is no reason to think that any obstacles will be raised to accessing beneficial ownership data.

This is not to suggest that Irish practice is ahead of Article 6 in all respects. Notably, data on allocation of state advertising expenditure has never been collated in anything like the comprehensive fashion envisaged by Article 6(1)(d). Nor is there compelling evidence to suggest

that all Irish media service providers have adopted the kind of internal editorial independence protection measures referred to in Article 6(3).

Furthermore, while EMFA does not overtly seek publicly disclosure of media market shares by audience and revenue, Article 22 (“Assessment of media market concentrations”) appears to require that at least some of this data be made available. (On what other basis can such an assessment be made?). However, at present there are no media-specific rules requiring financial reporting obligations in the media sector. The 2014 Companies Act requires ALL companies to keep proper books of account which give a true and fair view of the company's financial affairs. However, these requirements do not specifically address media companies and a survey of smaller Irish media firm filings in the Companies Records Office makes it clear that many do not file full annual returns so key metrics like turnover are not made available. (As noted previously, small firms (those with turnovers of €15m or less) are explicitly exempted from such financial reporting obligations by the Companies Act.

Finally, we note that the General Scheme (GS) of the Media Regulation Amendment Bill will impact upon this area. As outlined in the GS, the new legislation would amend section 28M of the 2002 Competition Act of 2002 in four key ways:

1. It adds a requirement to describe developments in the Irish media market over the previous three years, with reference to trends in media consumption and relevant economic data across the various media sectors in the State.
2. It requires Coimisiún na Meán to develop and maintain a media ownership database containing the information listed in Article 6(1) of the European Media Freedom Act, in relation to media service providers in the State.
3. It obliges Media service providers to notify Coimisiún na Meán when the information listed in Article 6(1) of the European Media Freedom Act is made available or updated, specifying what information has been made available and where.
4. It permits Coimisiún na Meán to request information or data that is necessary and proportionate to carry out its functions under this section from:
  - Any undertaking that carries on a media business in the State.
  - Any other undertaking or person that it considers may have relevant information.

Crucially, individuals or undertakings to whom such a request is issued will now be obliged to comply with this request within a specified period.

## Summary

In practice, information about the ownership of Irish-based and Irish-facing media outlets is easy to access in Ireland driven by the Broadcasting Authority of Ireland/Coimisiún na Meán's early identification of the criteria of databases of media ownership as a policy priority. The 2024 decision to support the expansion of the Media Ownership Monitor for Ireland arguably performs a media literacy function highlighting the implications of connections between media outlets and non-media individuals/entities.

That said, there remain risks related to transparency of ownership associated with a less-than-robust legal framework. The transposition of at least elements of EMFA will unquestionably improve matters in this regard, not least via the proposed Media Regulation Amendment Bill with its emphasis on the transparency obligations of media service providers.

The same is true of the state advertising provisions in the Media Regulation Amendment Bill which, if retained in their current form, will radically improve public knowledge about the hitherto effectively invisible (but potentially critical) allocation of state funds.

That said there remains substantial scope to introduce measures which would enhance the independence of Irish media.

- The current funding mechanisms of the PSM should be replaced by a model which ensures both less dependence on commercial revenues and which is less reliant on the vagaries of political decision-making.
- New models for appointing the boards of the PSM which either dilute or entirely remove government influence should be explored as a matter of urgency
- The critical role of public and private media in the constitution of the public sphere should be overtly acknowledged in statute as at least as significant for the health of society as well-resourced, education, health and social welfare systems. This would legitimate enhanced public support for media entities.
- Related to the previous point, consideration should be given to the introduction of a legal requirement for media outlets to publish audience and financial market share data, both a means of legitimating public funding support and also as a means of assessing influence in the public sphere.

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