

News media lobbying and the EU's Digital Services Act

Strategies and experiences from the small non-EU state of Norway

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ABSTRACT

The formation of the Digital Services Act (DSA) in the European Union (EU), aiming to regulate platform power, provided a unique policy window to secure media-specific interests vis-à-vis platforms. This study investigates how Norwegian news media actors utilised the policy window. Drawing on qualitative interviews with 20 elite informants in Norway and the EU, the analysis shows how the Norwegian actors strategised to protect editorial independence and autonomy by lobbying to exempt editorial content from platform moderation. Unable to build a broad coalition and facing substantial resistance from an alliance of platforms, fact-checkers, and civil society groups, the attempt failed. The study contributes with insight into how news actors from a small, non-EU member state lobbied to gain influence in a policy process at the EU level. It also illustrates how the blurring boundaries of journalism and the multifaceted European media landscape make supranational news media lobbying particularly demanding for small, outsider actors.

KEYWORDS: platform regulation, news media lobbying, policy solution, collective frames, editorial autonomy, Digital Services Act, DSA

Introduction

In recent decades, lobbying, or the efforts to influence policy processes (Baumgartner et al., 2009), has become more important for interest group advocacy, also in the Nordic context (Rommetvedt, 2017). The overarching trend is that the competition for political influence has tightened, and interest groups are more proactive in securing their interests (Rommetvedt, 2017). Moreover, influencing policy processes has become increasingly complex as regulation has moved from the national to the international arena (Jakobsson et al., 2024).

One example of such a complex and international regulation process is the formation of the European Union's Digital Services Act (DSA), which came into force in November 2022 (European Commission, 2024a). The act was a response to growing concerns about how large online platforms, such as Facebook and Google, were exercising market domination and impacting democracy (van Dijck et al., 2018). This, in turn, had led to calls for stricter national and international regulation (Flew, 2021; Flew et al., 2019; Helberger, 2020; Helberger et al., 2018). As stated by the vice president of the EU Commission, Margrethe Vestager, upon the DSA's approval: "With today's agreement, we ensure that platforms are held accountable for the risks their services can pose to society and citizens" (European Commission, 2022: para. 3).

Like other social actors, the news media are highly influenced by online platforms. A growing body of research has critically examined how these platforms impact journalism (e.g., Belair-Gagnon, 2015; Poell et al., 2022), focusing on platform asymmetries (Ihlebak & Sundet, 2021; Nielsen & Ganter, 2022), platform dependencies (Meese & Hurcombe, 2021), as well as countermeasures and disentanglement of platform power (Chua & Westlund, 2022). Even though the DSA is not a media-specific regulation, European news media organisations approached the formation of the DSA as an opportunity to counter platform power and secure media-specific interests (Papaevangelou, 2023). According to central Brussels stakeholders, European news media organisations lobbied for a privileged treatment of editorial content separate from platform moderation, a "media exemption", later known as the "non-interference principle" (Papaevangelou, 2023).

In this article, we take a Nordic perspective on these debates, analysing how Norwegian media actors mobilised to regulate platform power throughout the formation of the DSA. Norway represents an interesting case as it, on the one hand, represents a well-functioning media system. Like its counterparts within the Nordic media welfare state model (Jakobsson et al., 2024; Syvertsen et al., 2014), the Norwegian media field scores high on press freedom, is characterised by a strong self-regulatory media system centred around professional values and ethics, and has managed the digital transformation comparably well (Jakobsson et al., 2024). On the other hand, as policy and regulation increasingly take place outside the national field (Jakobsson et al., 2024), Norway has the obvious disadvantage of not being an EU member. Even though the European Economic Agreement (EEA) ensures that Norway follows the same obligations as EU

member states, the outsider position creates challenges in terms of lobbying and policy access (Gullberg, 2015). As studies of news media lobbyists at the EU level are still scarce (see Ihlebæk & Sundet, 2021), the present article provides unique insights. In particular, the examination of how contemporary media policy processes are carried out from an outsider position, and how they simultaneously play out on the European level, provides new and important knowledge (Flew, 2021; Flew et al., 2019).

Theoretically, we combine perspectives from the Media Policy Field (MPF) framework (Steen-Johnsen et al., 2019) and from lobbying literature (Baumgartner et al., 2009), aiming to take an actor-centred approach to understand strategies and power dynamics related to policy processes. The MPF framework posits that media policy changes occur when policy entrepreneurs can exert influence during policy windows, meaning moments when there is a shared understanding that there exists a problem and pressure to solve that problem on a policy level (Steen-Johnsen et al., 2019: 193). The extent to which actors succeed in utilising policy windows in their favour depends on their lobbying skills, including their ability to read the political environment, frame issues persuasively and build coalitions around them, and connect problems to favourable policy solutions (Steen-Johnsen et al., 2019: 193). In particular, the importance of collective frames – in this context meaning a shared understanding of the purpose and the position of the field – has been emphasised. Collective frames can be powerful tools for forging alliances between social actors and useful for shaping collective action in policy processes and solutions (Steen-Johnsen et al., 2019). Based on this, we ask the following question:

Which collective frames and media-specific policy solutions were emphasised by Norwegian news media actors lobbying the EU's Digital Services Act (DSA), and what do their experiences tell us about the role of small actors in EU policy processes?

The analysis builds on elite interviews with 20 informants representing 16 organisations. These include five CEOs of Norway's leading media groups, six leaders within the largest Norwegian press and business organisations, and nine lobbyists at the EU level representing Norwegian news media in Brussels.

In the following, EU and news media lobbying and the MPF approach are presented in more detail. Next, the case and method are discussed, followed by an outline of the collective frames, media-specific policy solutions, and coalition-building of the Norwegian news media actors and their allies. Finally, what their experiences tell us about the role of small actors in EU policy processes is discussed. Our findings indicate that an atypical national media model, powerful international challengers, and a complex European media landscape made lobbying at the EU level particularly difficult for the Norwegian news media.

News media as lobbyists at the EU level

As regulation has gradually moved from the national to the international arena (Jakobsson et al., 2024), lobbying has become an increasingly important and professionalised part of the EU's legislative processes. This has contributed to the pluralisation of interest representation on the EU level, among actors with diverging interests, authority, resources, practices, and potential impact (Coen et al., 2021). The development has also attracted massive scholarly interest. In the literature, EU lobbying is often characterised as diverse and complex, and hence difficult to draw generable insights about (Bouwen, 2002). Scholars do, however, agree that the EU lobbying scene is dominated by business interests, particularly bigger companies (Coen et al., 2021; Hanegraaff & Poletti, 2021). Moreover, lobbying coalitions, whether homogeneous (within the same sector) or heterogeneous (uniting different kinds of interest groups), can maximise impact by aligning diverse interests behind broad opposition or support for policy positions (Junk, 2019). According to EU lobbyists, four key assets are necessary to achieve impact in Brussels: contact networks; information and relevant arguments; process knowledge; and organisational resources, including material and human resources in Brussels (Lahusen, 2023).

Studies of platform lobbying in the EU identify both strengths and weaknesses in their influence on EU decision-makers (Gorwa et al., 2024). The financial strength of platforms is evident as they, along with other Big Tech firms, outspend all other interest groups in the EU (Bank et al., 2021). Their significant resources enable a strong presence in Brussels, further enhanced by their use of law firms, consultants, and lobby groups, as well as sponsorship of various groups, including think tanks that organise public events, facilitate debates, and publish reports (Bank et al., 2021: 6). Conversely, platform companies struggle with a poor understanding of the EU system and Brussels culture, being relatively new to the scene (Tarrant & Cowen, 2022). They also have weak relations with member state representatives, as they are perceived as threats to European businesses in most EU countries (Tarrant & Cowen, 2022). Platform companies also face increasingly critical European news media and public opinion (Schwinges et al., 2024), reflecting a growing global awareness of platform power and an increased emphasis on EU digital sovereignty (Heermann, 2024; Tarrant & Cowen, 2022). Hence, scholarly assessments of platforms' success in lobbying EU digital policy have been mixed (Gorwa et al., 2024; Tarrant & Cowen, 2022).

Regarding media lobbying, key studies have analysed policy processes from a stakeholder perspective, identifying media actors' goals, actions, and outcomes (Van den Bulck, 2012; Van den Bulck & Donders, 2014). Moreover, an increased focus on international regulation and how to address platform power culturally, socially, and economically has evolved (Gillespie, 2010; Helberger, 2020; Nielsen & Ganter, 2022). As noted, studies of news media as lobbyists at the EU level are, however, still scarce (see Ihlebæk & Sundet, 2021). An important exception, and of particular interest to this article, is Papaevangelo's (2023) study of the DSA policy process. In this study, European news media actors are described as

partakers in a complicated and unclear progression, with numerous stakeholders, lobbyists, politicians, and EU committees promoting different policy solutions (Papaevangelou, 2023: 471). Moreover, the support of the above-mentioned “non-interference principle”, initiated to restrict platform interference and moderation of editorial content, was fluctuating, with politicians alternating between backing and opposing the principle (Papaevangelou, 2023: 471). Evolving into a tug-of-war between news media lobbyists and policymakers fearing that the principle would be exploited by actors with bad intentions, the principle was eventually not included in the final version of the DSA (Papaevangelou, 2023; van Drunen et al., 2023).

The media policy field approach

To better understand how the Norwegian news media actors manoeuvred the messy, multifaceted, and complex policy process of the DSA (Papaevangelou, 2023), we lean on the MPF approach (Steen-Johnsen et al., 2019). This approach combines insight from theories about policy development and processes (Kingdon, 1995) with a strategic action field theory (Fligstein & McAdam, 2011, 2012). A strategic action field is defined as a,

meso-level social order where actors (who can be individual or collective) interact with knowledge of one another under a set of common understandings about the purposes of the field, the relationships in the field (including who has power and why), and the field’s rules. (Fligstein & McAdam, 2011: 3)

Importantly, the MPF framework distinguishes between three main social actors within a field: incumbents (established, powerful actors in a field), governance actors (organisations, associations, and interest groups seeking to protect compliance in the field), and challengers (newer entrants seeking to disrupt the status quo). The balance and dynamics of power between these actors, the rules of the game, and the overall direction of the field are constantly in flux, especially during times of crisis (Steen-Johnsen et al., 2019: 192; see also Fligstein & McAdam, 2011). In the context of our study, this implies that news media organisations (incumbents) and press organisations and associations (governance units) collaborate in policy development to protect the field against a specific form of challenger (global platforms), even though they, at the same time, may follow very different platform strategies on the individual level (Ihlebak & Figenschou, 2023).

Furthermore, the MPF approach points to the importance of collective frames because they signify how actors define the aims, relationships, and rules that underlie any field. During field crises, the collective frames become contested as incumbents, governance units, and challengers strive to establish dominant frames that suit their cause and how they position themselves as either innovators or stabilisers (Steen-Johnsen et al., 2019: 197). Previous research from national journalistic contexts has identified several dominant collective frames that typically legitimise the journalistic field’s autonomy and the distribution of

symbolic and material resources. The most central frame is the understanding of quality journalism as a prerequisite for democracy, relying on editorial independence, freedom, and adherence to norms, ethics, and values, such as truthfulness and factual accuracy (e.g., Ihlebæk & Figenschou, 2023; Maares & Hanusch, 2022).

Finally, the MPF approach emphasises the importance of illuminating how policy windows emerge and how they are utilised by actors to influence policy outcomes (Steen-Johnsen et al., 2019). In short, they stress that policy change relies on how some actors manage to identify problems and solutions and make them salient and appealing to a broader spectrum of stakeholders (Steen-Johnsen et al., 2019; see also Cairney & Jones, 2016). To successfully exploit policy windows, the social skills of these actors determine how well they manage to frame issues persuasively and gain the support of other social actors (Steen-Johnsen et al., 2019: 193).

In this article, then, our starting point is from the perspective of incumbents and governance units in Norway and the EU. We explore how they utilised the DSA policy window to frame their concerns about platforms as challengers to journalism, and how they applied this framing to promote favourable policy solutions.

Research design and methods

The Norwegian case

As noted, Norwegian news media actors are part of the Nordic media model, scoring high on press freedom, professional values, and autonomy (Ihlebak et al., 2024; Jakobsson et al., 2024). Compared with other media systems (Hallin & Mancini, 2004), professional associations in Norway have held a strong position, securing the autonomy of the journalistic field and independence from state intervention (Brurås, 2016; Hallin & Mancini, 2004). These governance units continue to play a powerful role in defending key journalistic principles, functioning as the primary representatives of the journalistic institution in public debates and policy processes (Brurås, 2016; Brüggemann et al., 2014; Hallin & Mancini, 2004).

The position of Norwegian incumbents is also comparatively powerful (Ihlebak & Figenschou, 2023). The ownership of Norwegian newspapers is dominated by three media groups: Amedia (local newspapers), Schibsted Media Group (national and regional newspapers), and Polaris Media (local and regional newspapers), and representatives from the established industry and news organisations hold key positions in professional associations. Combined with powerful public service broadcasting, generous press subsidies, and low levels of ownership regulation, they thus hold a solid position (Ihlebak et al., 2024).

Of relevance to lobbying, the Nordic media model typically exhibits close ties between stakeholders and is generally driven by consensus-based policy processes and strong associations as pressure groups (Ihlebak & Sundet, 2021; Puppis,

2009; Syvertsen et al., 2014). Moreover, the idea of “Nordic exceptionalism”, proposing that the Nordic media system has particularly positive dimensions related to freedom of speech, professional journalism, and trust in the media, stands strong (Jakobsson et al., 2024). In line with the overall development, the institutional structures and media policy of the Nordic media model have become more transnational, with an increasing orientation towards the regulation of media and communication systems at the EU level (Enli, 2025). Moreover, Nordic news media actors experience escalating competition from global media actors following other regulation and accountability structures than the Nordic (Jakobsson et al., 2024).

Method and analysis

To investigate how the Norwegian news media actors utilised the DSA policy window, interviews with 20 elite informants, representing significant incumbents and governance units in journalism at the national and EU levels, were conducted. Incumbent actors include leaders and CEOs of the four largest commercial Norwegian media groups and the public broadcaster NRK ($N = 5$). When it comes to governance units, we interviewed press organisations, business associations, and unions in Norway representing the major actors in the Norwegian field ($N = 6$). Since Norway is not part of the EU, Norwegian interest organisations lack access to the European Parliament and the Council of Ministers and typically must lobby through relevant European associations (Gullberg, 2015). We therefore asked the Norwegian informants if they were represented by any umbrella organisation or other actors in Brussels during the DSA process. Three umbrella organisations, one representative from Schibsted, and one representative from the Norwegian Parliament, all situated in Brussels, were mentioned and consequently approached to be part of the study ($N = 9$) (see Table 1 for an overview of all informants). The interviews took place from June to December 2023. Each interview lasted 45–60 minutes and was recorded, transcribed, and anonymised. Data collection was approved by the Norwegian Agency for Shared Services in Education and Research (SIKT), and informed consent (written or verbal) was obtained from all participants in accordance with the Norwegian National Research Ethics Committee’s guidelines. Informants also consented to the risk of being indirectly identified by their positions.

Table 1 List of informants

Level	Informant	Media actor
National level	N1	Schibsted (media group)
	N2	Aller Media (media group)
	N3	Amedia (media group)
	N4	Polaris (media group)
	N5	NRK (the Norwegian Broadcasting Corporation)
	N6	The Norwegian Press Association
	N7	The Norwegian Media Businesses' Association
	N8	The Norwegian Association of Editors
	N9	The Norwegian Association of the Trade Press
	N10	The National Association for Local Newspapers
	N11	The Norwegian Union of Journalists
EU level	EU1	European Publishers Council (umbrella organisation)
	EU2	European Publishers Council (umbrella organisation)
	EU3	European Broadcasting Union (umbrella organisation)
	EU4	European Broadcasting Union (umbrella organisation)
	EU5	News Media Europe (umbrella organisation)
	EU6	News Media Europe (umbrella organisation)
	EU7	News Media Europe (umbrella organisation)
	EU8	Schibsted (media group) representative working in Brussels
	EU9	Norwegian Parliament representative situated in Brussels

Elite interviews involve experienced informants who are skilled communicators, representing their organisations and sharing corporate messages. Despite being easily identifiable, elite informants can be difficult to access and may have limited time (Hertz & Imber, 1995). Therefore, thorough preparation and follow-up questions are essential to uncover deep insights. We prepared for the in-depth interviews by analysing position papers, strategy documents, reports, websites, press clips, and open letters from Norway’s largest press and business organisations and leading media groups regarding the DSA and related themes (e.g., freedom of speech and platform regulation). This analysis yielded important insights into the policy process and key arguments, which informed our interview guide.

To understand how the interests of the Norwegian journalistic field were communicated in the DSA process and how the actors sought to mobilise support

for their position, we conducted a thematic, abductive analysis of the interview transcripts in NVivo, alternating between predefined and newly identified codes (Clarke & Braun, 2022). The predefined codes reflected the themes of the interview guide, which were based on extant studies and the supplementary document analysis. First, we read through the interviews, identified the main themes, and discussed the operationalisation. This procedure was repeated until we reached a common understanding of the initial broad themes: organisational knowledge; positions and perceptions of the DSA policy window; the DSA lobbying process in Norway; and the DSA lobbying process in Brussels. Second, we re-read the interview transcripts and conducted a more fine-grained analysis to identify key articulations of collective frames and what journalistic core values were evoked, how informants related collective frames to policy solutions, and how informants reflected on their ability to build alliances and mobilise support through these frames during the DSA process. The interviews thus give insights into the self-reflections and positioning of Norwegian media elites and lobbyists in the broader DSA lobbying process.

It is important to note that the informants of this study, being elite informants or trained lobbyists, likely portray their organisations in the most favourable light. This includes strategically choosing what information to share based on their goals (Hertz & Imber, 1995). For instance, they probably underplay less altruistic goals, such as advancing their own political-economic interests, while overplaying more idealistic goals, like preserving journalism's societal and democratic value. Moreover, informants in both Norway and Brussels highlighted that one of the characteristics of the DSA lobbying process was the ease with which sub-actors united behind collective frames and media-specific policy solutions. As a result, nuances and differences between actors that traditionally hold different viewpoints (such as public service media versus private media) do not constitute a central part of the findings section.

Mobilising from a small non-EU state

As noted, the DSA regulatory process provided a unique opportunity to secure media-specific interests and curb platform power. However, to utilise a policy window effectively, the ability to frame issues persuasively, connect problems to favourable policy solutions, build coalitions, and read the political environment is crucial (Steen-Johnsen et al., 2019: 193). In the following, we start by exploring the collective framing of the Norwegian news media actors before investigating their policy solutions and coalition-building.

Collective frames: Editorial autonomy, freedom of speech, and democracy
Asked about what they perceived as the most important objectives to achieve through the new legislation, informants foregrounded several of the public concerns originally opening the DSA policy window, such as increased platform transparency, greater liability for illegal content, enhanced user rights, and better

solutions for contact and dialogue with the platform companies (European Commission, 2024b). Overall, informants hoped that the DSA would ensure public accountability and hinder grave societal impacts such as the influence of elections, polarisation, and the spread of fake news and mistrust. The political situation in Europe, threatening “democratic values, pluralism, and minority rights” (N7), and the spread of generative AI were highlighted as key arguments for the necessity of effective platform regulation.

As a natural extension of their overall democratic concerns, the informants emphasised the important democratic role of the news media. Among the Norwegian news media actors, protecting freedom of speech and editorial autonomy from platform moderation was perceived as particularly important. One informant, for instance, stated:

Norway and the Nordic countries are the countries in the world that have the most liberal room for free speech. We were very concerned that it would be restricted. From our point of view, DSA is primarily about how to regulate content, and for our members, it concerns editorial content published on the platforms. Should platforms be able to just take it down without further ado, or should there be routines associated with it? (N7)

Proposing that the Nordic media system has particularly positive dimensions related to freedom of speech and editorial autonomy, the informant’s remarks suggested elements of “Nordic exceptionalism” (Jakobsson et al., 2024). It was argued that platform moderation has the potential to threaten this unique media system. Overall, the informants argued, platform companies act as editors-in-chief when they moderate editorial content, and thereby threaten editorial autonomy (N5, N6, N7, N8, N11). Hence, they applied the established and much-used collective frame where autonomous quality journalism is understood as a prerequisite for democracy to outline platform moderation as a problem (Ihlebak & Figenschou, 2023; Maares & Hanusch, 2022).

Main policy solution: Media exemption from platform moderation

When asked about which concrete policy aims they worked towards during the DSA lobbying process, the Norwegian news media actors highlighted two policy solutions connected to the problem of platform moderation of editorial content: 1) that the DSA had to clearly distinguish between illegal and harmful content, and 2) that editorial content should be assigned a special position in the DSA due to its societal importance, and be exempt from platform moderation.

The first policy solution was a reaction to the debate on whether platforms should moderate both “illegal” and “harmful” content. Alongside other interest groups, the news media actors argued that the term “harmful” is inherently difficult to define, and expressed concerns that allowing platforms to moderate “harmful” content could result in platforms removing democratically important content (including editorial content) they disapproved of (N1, N7, EU8). Due to broad stakeholder agreement, the final version of the DSA solely refers to the

moderation of “illegal content”, defined according to the national legislation of individual member states (European Commission, 2024b).

The second policy solution, the exemption of news media content from platform moderation (later known as the non-interference principle), was, however, referred to as the most central media-specific lobbying priority among Norwegian media actors. When the proposal for the DSA emerged, containing a regulation that allowed platforms to continue their moderation of content published on the platforms, news media organisations collectively began advocating for a proposal that editorial content should be exempted (EU2, EU3, EU6). This would mean that platform operators could no longer moderate editorial content. The argument was that media content, which had already been editorially approved, held a special status and therefore should be treated differently from other content published on the platforms (N1, N7).

When asked why media exemption was their main lobbying priority, informants presented examples of what they saw as unacceptable platform moderation. Instances included shadowbanning of content related to sexual information (N5), breastfeeding mothers (N8), and nudity (N6). Other examples involved the removal of content considered to be of high societal value, such as images from Ukraine, due to the exposure of blood (N11). Furthermore, some argued that awareness of platform moderation had led to new newsroom practices indirectly threatening editorial autonomy, as “the knowledge of what is likely to be removed can lead to a chilling effect where you use images differently to avoid removal” (N11). As put by one of the Brussels-based informants: “Many publishing decisions revolve around whether to publish a particular image, with arguments like ‘No, TikTok does not want that’, or ‘Snapchat is going to remove it’. This then becomes a kind of de facto censorship” (EU8). In a more overall perspective, informants argued that the platforms’ moderation practices not only represent a threat to journalism and editorial autonomy, but ultimately can result in a skewed representation of reality, which in turn is a threat to democracy.

From the above, it is clear that the Norwegian news media actors saw the DSA policy process as a unique opportunity to address the long-standing problem of platform moderation of editorial content. Through the proposed exemption of platform moderation, they thus managed to link one of the public concerns that originally opened the policy window (preserving a healthy public sphere) to a favourable policy solution.

Lobbying through EU umbrella organisations

Although Norwegian media industry actors and governance units are increasingly aware of the importance of policy and regulations at the EU level, this is not an arena where they have been particularly active, informants stated (N2, N3, N5, N6, N9, N11). They further stressed that lack of resources, know-how, presence on the ground, and networks, as well as the fact that Norway is not an EU member, weaken their direct access, systematic efforts, and potential impact in EU policy processes (N1, N5, N7, N11).

On the national level, the Norwegian Media Businesses' Association (MBL) took the lead. At the time, the association was the only Norwegian governance unit that, for some time, had enhanced its resources, knowledge, and skills for more effective EU lobbying (N7). Together with the other national governance units, the MBL was central in identifying common areas of concern. However, the national units lacked sufficient experience, networks, and presence to work directly towards the EU system (N1, N5, N7). As each of the Norwegian governance units has umbrella organisations representing their specific interests towards the EU system, they instead relied upon these organisations to influence EU policymakers. Moreover, representatives from Schibsted's Nordic public policy department acted as contact points and expert advisors (N1, N5, N7, EU3, EU8).

According to the Brussels informants, lobbying towards the DSA started long before the DSA draft was published, with both Norwegian Schibsted and Brussels-based umbrella organisations publishing reflection papers in 2019 (EU2, EU4, EU6, EU8). When the draft was published by the European Commission on 15 December 2020, the umbrella organisations first processed and analysed the proposed legislation within their organisations, having internal experts on law and public policy share their assessments with their members (national media associations) across Europe (EU2, EU3, EU7). Next, they held meetings to identify areas in the legislation where they wanted to intervene and what wording improvements should be suggested (EU2, EU3, EU6). Additionally, the members discussed which common policy aims would best represent the organisations' position, summarised in a general policy paper (EU2, EU3, EU6). As umbrella organisations have broad remits, these policy papers are often the result of time-consuming negotiations and hard prioritisation. However, during the DSA process, the internal process was quite straightforward, informants stated, as the media associations had one common enemy and one overarching aim. One informant explained: "Because all members face the same problems, and because the online platforms have become so powerful, I think they all have the same objective: To have new, clear rules for these platforms" (EU3).

Ultimately, all the umbrella organisations at the EU level representing Norwegian news media actors formed an alliance where the media exemption principle (which at this point was renamed the non-interference principle) was central (N1, N5, N7, EU3, EU8). One Brussels-based informant, for instance, stated:

We united behind common messages; we had several joint position papers, joint statements on very specific issues, and that was a very good collaboration, I have to say! Because it was not just our members that were united behind the common objectives, but the entire sector. (EU3)

Unable to build a broad coalition

To gain both traction for their policy solution and a competitive advantage against powerful challengers, such as platform companies, the alliance of umbrella organisations needed to build broad coalitions including politicians and a wider spectrum of stakeholders (Steen-Johnsen et al., 2019: 198). In the final phase of lobbying, between the public consultation and the political agreement regarding the DSA (April 2022), they therefore strived to gain attention for their position and ultimately convince decision-makers to adopt and promote it in the negotiations leading up to the final act (EU2, EU3, EU6). Conducting classic insider lobbying, representatives from the umbrella organisations met with decision-makers to explain their position, policy aims, and proposed amendments (EU2, EU3, EU6).

Even though larger parts of European news media actors were mobilising for the non-interference principle through the alliance of umbrella organisations, whether the principle was a good solution became gradually more contested (EU1, EU4, EU5). As demonstrated by Papaevangelou (2023), a version of the principle was first proposed by French officials and supported by Germany, before the politicians changed their minds. According to the Brussels-based informants, the main counterargument was that it was hard to legally define what constitutes “news media” across Europe (EU4, EU6, EU8). Hence, there was a fear that actors with bad intentions would exploit the legal protection (see also Papaevangelou, 2023).

According to the informants, the strongest resistance to the principle, however, came from a coalition of platform companies and civil society organisations, including fact-checking, freedom of speech, democracy, and citizen groups (see also Papaevangelou, 2023). The Brussels-based informants stated that they were surprised by the strength of the opposition, describing it as “extraordinary” (EU1), “unexpected” (EU8), and a “very clever spin” (EU5). As one informant noted: “I cannot underestimate the opposition we received. There were campaigns everywhere – Twitter, LinkedIn – they were all over the MEPs [members of the European Parliament], and of course, the platforms – we know – supported a lot of these lobbies behind the scenes” (EU1). The platform companies were described as powerful and ruthless, and their campaign was labelled as “pretty ugly” and “a little bit populist” (EU6). Fact-checkers and other civil society actors, on the other hand, argued that the wide definition of media could give a “blanket exemption” for editorial content (Papaevangelou, 2023), including problematic outlets such as Russia Today, Sputnik, and Tass.

Despite the resistance, the alliance of EU level umbrella organisations representing the Norwegian news media actors kept the non-interference principle as a central lobbying priority. Due to the platform companies’ extensive lobbying resources, compelling arguments, and strategic alliances with civil society groups, the Brussels-based informants did, however, describe the last part of the DSA process as an “uphill battle” (EU3) and “quite a pushback” (EU4). The platform coalition’s ability to mobilise “disparate voices” against established media (EU2) was also stressed. While all informants in Brussels indicated that civil society

groups were “used” and “bought” by platform companies through financial ties, such as sponsorships or funding arrangements (EU2, EU3, EU5), their criticisms varied in intensity. Some informants also asserted that the opposition had created a spin related to the first label of the principle (the media exemption principle), indicating that the news media industry was seeking special advantages. One informant, for instance, said: “They [the platform alliance] are basically saying, ‘Yeah, the media thinks it sits above the rules that apply to everyone else, and that’s not fair’” (EU6). According to this informant, the intent of the policy solution was never an “exemption” – as news media content undergoes editorial approval before platform publication. “We’re not exempt from any rules, but we need to enforce the rules that apply offline online”, the informant stated (EU6). To prevent unfavourable associations, the news media lobbyists later renamed the principle the non-interference principle (see also Papaevangelou, 2023).

In the end, gaining sufficient support for the non-interference principle proved too difficult, Brussels-based informants stated (EU2, EU4, EU6). As the difficulties of defining “media” were one of the main counterarguments, they started advocating for various solutions, building upon current regulations and provisions, such as the EU’s Directive on Copyright in the Digital Single Market and the Journalism Trust Index developed by Reporters Without Borders. However, this was of little help, and the coalition remained relatively small and narrow (EU1).

The policy solution of non-interference with editorial content was never included in the DSA. One Norwegian informant, in hindsight, remarked:

It may be that we were initially a little too focused on the Nordics. [...] So, obviously, when you consider the thousands of both reputable and disreputable publicists in Europe, you see that it is not easy to figure out how to separate the real ones from the not real ones. (N1)

Hence, it seems like the alliance supporting the non-interference principle failed to read the political environment outside their own regions. Especially within the Nordic media model, characterised by a high level of media trust, journalistic autonomy, effective self-regulatory instruments, and a media structure enabling the identification of editorial news media (e.g., Ihlebæk et al., 2024), the non-interference principle likely seemed like an appropriate policy solution. However, instead of considering the DSA lobbying a failure, Brussels-based informants, describing lobbying as a continuous process, saw it as good preparation for the European Media Freedom Act (EMFA), a regulation aiming to strengthen the freedom, independence, and pluralism of media across the EU (see also Papaevangelou, 2023). In this policy process, informants stated, it would be wise to be less absolute. “After all, we asked for a ban, which was very harsh”, one informant said (EU8). When the EMFA entered into force on 8 August 2025, the planned strategy seemed to have been successful. As declared by the newly established Media Board (2025: para. 8), platforms shall “engage in a meaningful dialogue” with media service providers considering their content to be unfairly removed or suspended.

Concluding discussion

In this article, we have examined how Norwegian news media actors attempted to utilise the policy window opening up as the European Commission was developing and drafting the DSA. By analysing collective frames and media-specific policy solutions, we have shown how the actors linked the public concern that opened the policy window to a favourable policy solution: the principle of non-interference with editorial content. However, despite the efforts of an alliance of umbrella organisations at the EU level, the policy solution was never incorporated into the DSA. Applying the MPF approach (Steen-Johnsen et al., 2019), some key lessons can be learned:

First, the study shows how governance units, both at the national and supranational levels, mobilised to push the principle of non-interference. To manoeuvre in the increasingly complex lobbying processes at the EU level (Jakobsson et al., 2024), the Norwegian Business Association (MBL) strengthened its resources, knowledge, and skills and took the lead nationally. However, still lacking the necessary experience, networks, and presence, the Norwegian media actors relied upon their EU-level umbrella organisations to lobby directly towards the EU system. In turn, these umbrella organisations formed a homogeneous coalition promoting the non-interference principle. Through aligning interests and leaving the lobbying to organisations with sufficient contact networks, information, process knowledge, resources, and Brussels presence, the Norwegian media actors and their allies thus followed all the recommended procedures to maximise their impact in EU policy processes (Junk, 2019; Lahusen, 2023).

Second, the study shows that the Norwegian news media actors and their allies failed to read the political environment at the EU level. The collective frame of autonomous news media as a prerequisite for a democratic public sphere, which had previously been successfully applied within the Nordic media welfare states (e.g., Ihlebæk & Figenschou, 2023), did not resonate well at the EU level. As pointed out by the informants, the EU contains multiple media systems, including systems where boundaries between autonomous, editorial-driven journalism and partisan political journalism are unclear (Humphrecht et al., 2022). Fearing that actors with bad intentions would seek to exploit the legal protection of editorial content, central EU officials thus stopped supporting the non-interference principle. Moreover, the DSA is a horizontal legislation, mainly aimed at protecting the public as consumers and citizens, not news media autonomy (European Commission, 2024b). In this context, the principle of non-interference with editorial content was too media-specific. Consequently, mobilising broad support from politicians, news media actors from differing press systems, and other stakeholders proved challenging.

Third, the alliance of umbrella organisations underestimated the power challenge from platforms and their counter-alliance. In building a lobbying coalition with civil society organisations and fact-checkers, the platform companies positioned themselves as the voice of public interest versus the news media industry. Hence, they managed to frame the non-interference principle

as an attempt to protect the news media's business interests, and thus as a self-serving attempt to grant special advantages to a particular industry rather than contributing to a public good. According to the Brussels-based informants, this reframing was possible due to the platform companies' significant financial resources and comparatively strong presence in Brussels (Bank et al., 2021).

Following the above, the Norwegian news media's experiences illustrate how complex and difficult it can be for small actors to lobby EU policy processes. As shown, collective frames that are effective in national contexts to push and protect national policy measures do not necessarily translate supranationally. No longer protected by the structures and culture of the Nordic media model (e.g., Ihlebæk & Figenschou, 2023), the Norwegian news media actors and their allies were unable to convince other stakeholders about news media holding a special position in the public sphere. In turn, this made it difficult to lobby for an exemption from the general rule of platform moderation. In an arena of multiple media models holding variable reputes, the Norwegian news media actors were, in other words, not able to safeguard the specific symbolic resources of the not very widespread Nordic media model.

The experiences of the Norwegian news media actors also illustrate the disproportionate gap between the lobby prerequisites of large, international companies and smaller, national players. Although well-resourced and professionally robust compared with other media players, the Norwegian news media actors have severely limited financial resources compared with the platform companies. While platforms could sponsor coalition partners and initiate multi-site lobbying campaigns, their Norwegian counterparts lacked EU lobbying experience, networks, and presence in Brussels. Although maximising their impact through umbrella organisations, which in turn succeeded in uniting behind one central policy solution, they stood no chance against the platforms' lobbying apparatus.

Although Norwegian news media actors hold a special position, as Norway is not an EU member, their experiences are likely transferable to other players from small nations attempting to influence policy processes at the EU level. With the centralisation of regulatory power, policy processes become more complex. As our findings show, this can make it harder for small actors to form united and effective alliances. In such an environment, international challengers with economic power and dominating market positions seem more likely to build coalitions and be heard than incumbents and governance units from small nations. Hence, the power balance between incumbents, governance units, and challengers seems to be altered when policy processes turn international. Our findings thus suggest that the MPF approach should place more emphasis on the level of the arena in which policy processes occur.

To get a more complete picture of news media lobbying at the EU level, future studies should take media models other than the Nordic as their starting point. Moreover, the internal power struggles within the various umbrella organisations should be more thoroughly examined, and position papers, strategy documents, reports, websites, press clips, and open letters analysed. As lobbying

is a continuous effort requiring long-term commitments and knowledge of parallel policy processes (Lahusen, 2023), the DSA experiences will likely enhance the EU lobbying skills of Norwegian news media actors and their allies for future legislative processes. Nonetheless, it should concern news media lobbyists that even a group of well-resourced and professionally robust media actors, given a unique policy window, were not able to challenge the platform companies' collective framing during the DSA policy process.

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