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# Media Accountability: Global Trends and European Monitoring Capabilities

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## Abstract

This article summarises the global state of the art of research into media accountability, using this overview as a framework for an analysis of 14 European countries' structures and the possibilities for monitoring their media accountability landscapes. The first step shows that a model developed purely in the context of liberal Western democracies struggles to explain the diversity of media accountability instruments, actors, proceedings, and the effectiveness of these systems in different countries. When a broad understanding of media accountability is applied, different models of media accountability frameworks can be identified globally, and even within Europe. These findings on structures and actors in the field function as guidelines for the second part of the article, which analyses monitoring capabilities in Austria, Bulgaria, Croatia, the Czech Republic, Estonia, Germany, Greece, Hungary, Italy, Latvia, Poland, Romania, Slovakia, and Sweden—with a special focus, not only on the status quo, but also the capability to monitor changes and trends over time. Even in countries with generally well-developed monitoring and research structures in the media sector, much of the available literature focuses on normative questions, and available data is not necessarily comparable longitudinally or cross-nationally. International efforts have inspired key publications in a number of countries, but they are rarely followed up by continuous monitoring of developments in the field. Several cases describe a common reason for monitoring deficits: Weak professional culture among journalists leads to ineffective and often neglected media accountability measures, which in turn limits research activity and funding opportunities.

## Keywords

co-regulation; journalism ethics; media accountability; monitoring capabilities; self-regulation

## 1. Introduction

Media accountability has been an emerging topic in the first two decades of the century in Europe and beyond, both regarding journalistic or social practice and research. Going beyond a normative understanding of journalism ethics, media accountability includes the question of the implementation of ethical rules and feedback from outside journalism. Bertrand (2000, p. 107) defines it as "any non-state means of making media responsible towards the public." However, monitoring structures of the field have so far not been analyzed in a consistent way. The research question is twofold:

> RQ1: First, it must be established which actors, instruments, and fields of media activity need to be taken into account in different national contexts. An attempt to map monitoring capacities requires defining the reach of the concept in order to know what to include.

> RQ2: Only then, secondly, can we meaningfully map and compare monitoring capacities for media accountability in different countries.

Consequently, this article aims to answer these questions by building on and combining two perspectives, each focusing on one of the tasks outlined above: In a first step, it shows trends in media accountability from a global perspective in order to describe a comprehensive framework of instruments and their interplay in different social settings. This framework guides the second step, a study into monitoring structures, by defining the variety of possible media accountability activities. This study focuses on the EU context and addresses the question of monitoring infrastructures based on case studies of the situation in 14 EU countries. Both perspectives (the first on global trends in the field and the second on monitoring capacities in Europe) can then be combined to identify strengths and weaknesses of academic, professional, and institutional monitoring activities.

Analyzing monitoring capacities of media accountability in EU member states is a topical endeavour: While the discourse on media accountability is older in many Western European states, in several newer member states in Central Eastern Europe, both accountability practices and professional, social, or academic discourse on the topic have intensified. With the European Commission's proposal for a "media freedom act" for the EU and its central references to self-regulation instruments as important tools for safeguarding journalistic integrity and independence (European Commission, 2022a), the area might see a completely new dynamic. In the related recommendations, the preference, but also the call for journalistic self-regulation becomes even more evident (European Commission, 2022b, p. 3): "Media self-regulation and standards of journalistic ethics are effective tools to empower journalists and help them to resist undue pressure, including of a political and commercial nature, thus enhancing public trust in the media." However, when media accountability is increasingly recognized as a central factor for media freedom at large in the European context, the question of monitoring and measuring self-regulatory practices in the media becomes pertinent. When media accountability systems face interest and demand not only from the professional community but even from European legislators, what do we actually know about these activities in the different member states of the EU?

However, while the concept of media accountability has long been discussed from the point of view of—and with regards to—Western or Western European countries, the different historical paths of media systems

within the EU require a holistic understanding of what instruments and fields of action may be relevant. Applying a global perspective of self-regulatory practices ensures such a broad approach, including instruments and practices that may be uncommon in Western Europe.

## 2. Trends in the Media Accountability Discourse: A Literature Review

Before 2010, research on accountability in journalism focused mainly on theoretical and normative aspects and, to a lesser degree, on empirical studies. Laitila (1995) and Bertrand (2000) pioneered the comparative analysis of media accountability instruments (MAIs) by comparing the content of European press codes. Bertrand (2000) additionally studied the existence of further "media accountability systems," as Bertrand terms it, such as press councils and ombudspersons in Europe. Nordenstreng (1999) analyzed structures and practices of media self-regulation in several European countries. Hafez (2002) compared press codes in European and Arab countries. For a number of countries, empirical and internationally comparative data is available on journalists' views and perceptions: The MediaAcT project conducted in-depth survey research on the practical impact of MAIs and the context factors for accountable journalism in twelve European countries as well as Jordan and Tunisia (Fengler et al., 2014), and the Worlds of Journalism project included four questions on perceptions of ethics in its 67-country survey of journalists (Hanitzsch et al., 2019). Wiedemann (1992), Bertrand (1978, 2000), Pöttker and Starck (2003), Puppis (2009), and Fielden (2012) analyzed the structures and functions of (Western) press councils from a comparative perspective. Most recently, Trappel and Tomaz (2021) discussed media accountability as an indicator to assess media performance across countries. Apart from the studies highlighted here, nearly all other studies in the field of media accountability analyze the issue from a national perspective. García Avilés et al. (2009) and Karlsson (2010) studied media transparency instruments comparatively. The EU-funded FP7 project MEDIADEM compared media policies across EU member states and candidate countries (Psychogiopoulou, 2012). The Media Pluralism Monitor (Centre for Media Pluralism and Media Freedom, 2022) compares media independence and pluralism across EU and candidate countries and provides a highly relevant dataset to be considered. Based on data from European case studies, Eberwein et al. (2018) generated the first European Media Accountability Index, in which Norway, Finland, Sweden, Austria, and Germany ranked highest.

An extensive view of media accountability practices and their interplay is best based on a large variety of country cases. In particular, it is advisable to look beyond the borders of European or Western societies and accountability discourse: *The Global Handbook of Media Accountability* (Fengler, Eberwein, & Karmasin, 2022) delivers such a perspective based on a study of 44 countries across world regions and political regime types. Besides several country cases from Asia, Latin America, Sub-Saharan Africa, the MENA region, and the Anglo-Saxon world, the diversity of European political and social contexts is represented by EU member states Estonia, Germany, Hungary, Italy, Poland, Spain, and Sweden, as well as Bosnia and Herzegovina, Ukraine, and Russia. Country studies were based on desk research analyzing a variety of secondary data and existing literature; in a few cases, authors drew on interview or survey data. In terms of scope, the study built on Bardoel and d'Haenens' (2004) work on the various fields potentially involved in the accountability process. Besides the profession of journalists, they mention the market, the political sphere, and the public. This framework facilitates a debate about the role of media accountability beyond Western democracies. Fengler, Eberwein, Karmasin, Barthel, and Speck (2022) revise this approach with a special focus on actor groups and suggest adding a fifth frame covering international accountability to integrate activities by foreign actors (e.g., foreign donor organizations).

Based on the country reports collected in Fengler, Eberwein, and Karmasin (2022), Fengler's (2022) comparative analysis retrieves eight models of media accountability: (a) the Professional Model, (b) the Company Model, (c) the Public Model, (d) the Dysfunctional Variant of the Professional Model, (e) the Foreign Donor Model, (f) the Statutory Model, (g) the "Mimicry" Model, and (h) the Regulation Model.

The Professional Model (a) dominates in countries featuring many different MAIs on the professional level, including press councils, codes of ethics, broadcasting commissions, media journalism, media-critical blogs, and social media, complemented by a variety of instruments on the media-organizational level. The Company Model (b) is prevalent in countries characterized by local media accountability dominated by MAI initiated by individual news outlets: ombudspersons, company codes, media journalism, and social media. The Public Model (c) is found in countries featuring elements of the professional model (journalists' federations, codes of ethics, and ethics committees), which, however, appear rather weak and less institutionalized. Journalists are often challenged by political, economic, and even physical pressure. At the same time, NGOs, academics, and civil society exert pressure for greater media freedom, pluralism, and accountability—most notably, media observatories following up on media issues and thus "augmenting" the deficits of self-regulation. The Dysfunctional Professional Model (d) is observed in countries following regime change and subsequent deregulation of media markets, which allowed foreign investors to buy considerable shares in these markets without giving sufficient thought to media accountability. Journalistic organizations have adopted codes and established ethics councils or committees, but the professional model exists only on paper, as there is no ethics body with broad acceptance across the profession. Also, the divide between journalists with differing political alignments or economic interests opens the door for government actors to define what media "accountability" means, especially for broadcast journalism. The Foreign Donor Model (e) describes countries where the establishment of MAIs is largely dependent on foreign donor support. This is often the case in the aftermath of a democratic transition when journalists and media companies are ill-equipped to handle their new freedoms responsibly due to a lack of professionalism or simply due to economic pressure. Without widely accepted professional associations or a culture of professional self-criticism, foreign donor organizations or media companies try to implement MAIs, although with mixed practical results. The Statutory Model (f) describes a situation in which statutory bodies have been initiated in the context of political transformation phases, which have not yet resulted in full democracies or established press freedom. Statutory councils are not the outcome of self-regulation but are established by government decree or by law, and their budget comes from public funds, with different degrees of public or indeed government control over who is represented in them. The "Mimicry" Model (g) applies to several countries that have established statutory councils as well, but the label "council" seems purposefully misleading when these examples have to be considered cases of "media capture" as practised by "competitive authoritarian regimes." These councils clearly do not meet the normative criteria laid out by UNESCO (2008) or the Council of Europe (Parliamentary Assembly, 2008) but serve as government tools to control (access to) the profession and exert strict sanctions. In most of these countries, press and media "councils" can impose fines and have, in some cases, legal powers even to close media entities, regulate entry to journalism, or impose sanctions for breaches of "standards." Finally, Iran and China are examples of the Regulation Model (h), countries with *media regulation* in its "purest" form, not allowing for any form of media accountability, and not even engaging in "mimicry" or "gardening" activities to cover up authoritarian practices. Instead, media and journalism are under full government control, and no form of accountability practice is possible apart from informal and non-public dialogue between trusted individuals. Otherwise, all media accountability activities can only be performed from exile, and even exiled actors face repression.

It needs to be stressed that these eight models of media accountability are descriptive categories, and hybrid forms of media accountability exist. Also, political changes may immediately impact the structures of media accountability.

What deserves to be highlighted for the European context is that even within this region of supposedly rather well-established and well-researched systems, stark contrasts become obvious upon closer analysis. Seven EU countries have been part of the study for the *Global Handbook of Media Accountability*, which aimed to classify the different media accountability systems on a continuum between highly regulated and highly self-regulated media accountability systems; various context factors impacting media (self-)regulation practices in the specific countries are extensively discussed in the book. More than 30 years after the start of the fundamental transformation process in 1989, the study still sees a divide between Northern and Western European countries on the one hand and Southern and Central Eastern European countries on the other. Estonia, Germany, Spain, and Sweden are classified within the Professional Model, Italy within the Company Model, Poland within the Dysfunctional Variant of the Professional Model, and Hungary within the Mimicry or Gardening Model (Fengler, 2022, pp. 572–574). Consequently, further study into the European landscape of media accountability, including monitoring structures, calls for a similarly wide approach to the topic. Section 3 focuses on the capabilities in place to perform this task, but for a higher number of EU member states.

## 3. Monitoring Capabilities in Europe

The results presented here are part of the Mediadelcom project's aim to map and evaluate monitoring capabilities in different sectors that are relevant to media and public communication. Results are based on country case studies of the monitoring situation in Austria, Bulgaria, Croatia, the Czech Republic, Estonia, Germany, Greece, Hungary, Italy, Latvia, Poland, Romania, Slovakia, and Sweden (Mediadelcom, 2022). The term "monitoring capabilities" is understood as the capacity to collect, communicate, and interpret data provided by academic research and public authorities, the private sector, or NGOs. The research effort took a range of questions into account: data availability, recency, and continuity, as well as the complexity of accessing data for researchers, stakeholders, or simply interested citizens. Moreover, the institutionalization of the different fields and the availability of experts was assessed. In the larger context of the project, this inventory of monitoring capabilities also serves as the background to further analyze the key developments in the sector in the 2000–2020 time frame. Before exploring "what is," it is necessary to find out what kind of data is actually collected in the different countries, and in which areas.

To achieve a holistic view of the field, this research was conducted not only for the field of media accountability but also for journalism as a market and a professional activity, media usage, media-related competencies, and legal regulation. Compared to these areas, it is important to note that media accountability differs in that institutionalization, significance, and instruments of media accountability vary considerably between countries, as described in Section 2. Consequently, monitoring activities in a country can be expected to focus on those frames and those particular instruments of media accountability that are actually in use in a given national setting. While the "journalistic job market" or "audience trust in news" exist in any country and monitoring them is important to map the state of these areas, different frames of media accountability and their respective instruments are just not relevant in certain countries, making monitoring activities of such instruments rather pointless: There is little sense in conducting empirical research on

"media ombudspersons" in a country where this instrument of media accountability is not relevant. Because of this special feature of media accountability, it is necessary to contrast findings on monitoring activities with the overall situation of media accountability in a given country.

As there is no established state of the art of how to monitor monitoring activities, it is still largely unclear to what extent different countries generate data on accountability activities in their media systems. To define the scope of the country case studies in terms of instruments and actors of media accountability, the study drew on the conceptualization described in Section 2 (model based on Bardoel & d'Haenens, 2004, amended by Fengler, Eberwein, Karmasin, Barthel, & Speck, 2022). Case studies evaluated the situation in each country, both with regard to the relevance of the frame and monitoring activities: As there is no established state of the art of how to monitor monitoring activities, it is still largely unclear how far different countries generate data on accountability activities in their media systems. To define the scope of the country case studies in terms of instruments and actors of media accountability, the study drew on the conceptualization described in Section 2 (model based on Bardoel & d'Haenens, 2004, amended by Fengler, Eberwein, Karmasin, Barthel, & Speck, 2022). Case studies evaluated the situation in each country, both with regard to the relevance of the frame and monitoring activities:

- Professional accountability: Activities by the journalistic profession, e.g., non-statutory press or media councils, codes of ethics, professional discourse;
- Market accountability: Activities by media companies, e.g., company ombudspersons, organizational codes of conduct, journalism as a topic in the media, (online) transparency tools;
- Public accountability: Activities by members of the public and the audience, e.g., media-critical initiatives and publications;
- Political accountability: Activities initiated based on political/legal mandates, e.g., statutory press/ broadcasting commissions, government media commissions;
- International accountability: Activities initiated by international actors such as donor organizations or investors, e.g., foreign companies "importing" their codes of conduct into media they invest in, media development activities by NGOs or states to establish MAIs in a country.

In addition to this evaluation by accountability frames, country case studies focused on the general establishment of monitoring infrastructures for media accountability by academic, public, and private actors. This was done with three main focus points: institutionalization of monitoring activities; developments over time since the year 2000; and the impact of international research and cooperation.

This focus on different actors in the monitoring landscape, the role of international cooperation, and developments over time allows us to map the dynamics involved in monitoring media accountability in the studied countries, highlighting both explanations for strong or deficient monitoring of media accountability activities and current trends.

Data collection was conducted by researchers native to the countries under study and mostly relied on desk research and complementary expert interviews. Accessed documents included academic literature, reports by public and private actors, case databases of institutions of media accountability, and data on the existence, funding, and capacities of monitoring institutions, covering a time frame from 2000 to 2020.

## 3.1. Instruments of Media Accountability

While the study was guided by a broad understanding of media accountability, there is a clear focus on data-gathering and interpretation of traditional accountability instruments—mainly codes of ethics and press or media councils. These instruments may fall in both the professional and political accountability frame as they may be set up by members of the profession, with or without the inclusion of other stakeholders (e.g., media companies), or because of statutory requirements frequently found in the broadcast sector. All case studies show at least some academic discourse on these instruments. Moreover, self-regulatory councils often produce data themselves, although with different levels of access and usefulness. The press councils in Austria and Germany publish case data on their websites and additional annual reports with explanations and some statistical overviews of their work (Eberwein et al., 2022; Kreutler & Fengler, 2022). Similarly, the Swedish Press Council (since 2020, the Media Ombudsman and Media Ethics Council, now also covering audiovisual media) explains its rulings and positions in regular reports (Berglez et al., 2022). Such publications may be valuable sources both as an overview on their own or as a starting point for further research. Unfortunately, these reporting practices tend to lack reliability in countries that lack an undisputed central council to regulate a large proportion of journalistic output. In Estonia, two different councils are in competition (Pressinõukogu and Avaliku Sõna Nõukogu/ASN), so both bodies' reporting only covers a part of the media landscape. While this particular situation has inspired research on the differences and relations between these councils, their case reporting obviously follows different proceedings and reporting patterns (Harro-Loit et al., 2022).

The above-mentioned examples of press/media councils with favourable reporting practices all stem from countries associated with the Professional Model, where these councils are well-established. Given the lack of multipartite press councils in some other countries under study, journalists' unions and syndicates sometimes have ethics committees attempting to encourage ethically sound conduct of their members. Such a situation can be associated with the Public, Dysfunctional, Professional, or even the Mimicry Models; the instruments are comparable but less institutionalized or may even be controlled by political interests or stakeholders outside the profession. Such a situation seems to negatively affect the possibilities for monitoring the cases processed by these bodies. For example, the ethics committee of the Czech syndicate of journalists reports on its work. However, beyond being only an internal instrument, it is also selective in terms of cases it accepts; most importantly, it excludes tabloid journalism from its work, so the boards' publications can only cover a rather small fraction of problematic journalistic conduct in the country (Waschková Císařová et al., 2022). While such publications are obviously incomplete, the least favourable situation regarding access to case data is present when transparency on council or committee work is completely lacking. In Hungary, no less than four journalists' organizations function as co-regulators with the assistance of the state's media authority, and none publish details on their casework (Polyák et al., 2022). In Greece, where a central council is missing, disciplinary committees belong to regionally organized journalists' unions, and only one of them (the Union of Journalists of the Athens Daily Newspapers) publishes its processed cases transparently (Psychogiopoulou & Kandyla, 2022).

The existence or lack of an established press or media council also seems to be relevant for academic research and public discourse on media accountability. The Austrian case is especially instructive: an older council ceased to exist in 2002, leaving the country without an effective press council until the current Presserat was established in 2010. This re-foundation is described as a starting point for stronger institutionalization of

academic research structures as well as networks of academic and professional actors (Eberwein et al., 2022). In Croatia, where there is no press or media council, the potential of such an institution was nevertheless discussed in academic literature (Peruško & Vozab, 2022).

Data and discussion on other instruments in the remaining frames are comparably scarce. Many of these instruments are only relevant in some of the countries studied, and even when they do exist, they suffer from a monitoring focus on council or committee work, resulting in very little data being produced about them. Media journalism has been researched mostly in Germany, although not necessarily focusing exclusively on its possible self-regulatory function; in Austria, the field is covered at least by master's theses and trade publications. The German-speaking countries are also the only ones to report academic research into media watchblogs (Eberwein et al., 2022; Kreutler & Fengler, 2022). Within the market accountability frame, media ombudspersons have seen rather limited academic and professional discourse in Austria, Germany, Latvia, and Italy—in the latter case mostly as a hypothetical instrument since the position was only ever created and later abolished by two Italian newspapers (Splendore et al., 2022). The international frame as a means of "importing" accountability practices into a country only became visible in one specific Hungarian publication (Polyák et al., 2022), focusing on a possible influence of German publishers who had invested in the Hungarian market (Galambos, 2008). For the Estonian case, the import of self-regulatory mechanisms has also been described, but only for the early 1990s (Lauk & Harro, 2003).

### 3.2. Institutionalisation

In terms of the institutionalization of data gathering and research into media self-regulation, country case studies overall reveal different levels of deficit. In the broader context of this research project, monitoring capabilities in the field of media accountability were analyzed in conjunction with the corresponding capabilities in the area of legal regulation, thus allowing for a comparison between the two fields. Results show a rather complete continuum ranging from country cases where monitoring capabilities are clearly more established in the domain of legal regulation, such as Austria, Bulgaria, or Greece (Eberwein et al., 2022; Psychogiopoulou & Kandyla, 2022; Raycheva et al., 2022) to two cases with the opposite situation of a monitoring focus on self-regulation rather than legal regulation: In Slovakia, noticeably more publications can be registered on media accountability and self-regulation than on legal regulation (Gálik et al., 2022). While the output in terms of publications is more balanced in Estonia, the field of self-regulation is considered analytically more advanced compared to a rather fragmented legal discourse (Harro-Loit et al., 2022). While Italy and Czechia share a bias towards legal proceedings for solving problems of journalistic conduct, the Czech case is characterized by a lack of monitoring activities in both areas (Waschková Císařová et al., 2022). In Italy, however, media ethics and responsibility have at least a normative-theoretical tradition besides a well-institutionalized legal discourse (Splendore et al., 2022). In the Greek case, where legal regulation is decidedly the more institutionalized field, available scholarly literature on self-regulation criticizes both the lack of established accountability instruments (beyond the mere existence of codes) and their lack of effect on the print and broadcast media. Even though there are only a few studies, the country can be described as a case of relatively well-researched practical deficits of media accountability (Psychogiopoulou & Kandyla, 2022).

### 3.3. Development 2000–2020

Even with the deficits described above, both in terms of institutionalization and the coverage of different frames of media accountability, the trends over the 2000–2020 time frame are generally positive. This is especially the case for Central Eastern European countries, where the field has only been established for around 20 years. Beyond the role that the existence or foundation of an independent council may have, several case studies mention the role of journalism or communication students and their interest in raising awareness of the field as such or specific instruments and cases (Eberwein et al., 2022; Harro-Loit et al., 2022; Waschková Císařová et al., 2022). For example, students' final theses provide qualitative case studies on different aspects of media self-regulation, especially journalists' perceptions (Estonia) and ethical problems in specific fields of coverage (Czech Republic), but also on specific instruments (Austria) that had not previously been covered. While the Czech situation overall is characterized by several monitoring deficits, this interest in the field on the students' part might start to affect structures in education and research. The first media studies course with specific consideration of media ethics was established in 2020, and the first research team dedicated to the topic was established in 2021 (Waschková Císařová et al., 2022). In neighbouring Slovakia, albeit without reference to a possible student role in the process, a marked increase in publications on journalistic self-regulation over the course of 20 years can be seen (Gálik et al., 2022). While the status quo of monitoring capacities in the field of media accountability clearly shows very different levels of institutionalization, none of the studied countries has reported a decrease in discourse, publications, or structures.

### 3.4. Impact of International Research and Cooperation

Over time, international cooperation in comparative research projects has played an important part in building monitoring structures and competencies in several countries, especially within Central Eastern Europe. From Estonia, Latvia, and Romania, efforts such as the EU-funded projects MediaAcT (specifically on media accountability), MEDIADEM (on media policies), and AntiCorrp (on anti-corruption policies) have been reported as key initiatives with a sustainable impact on the national monitoring potential (Avădani, 2022; Harro-Loit et al., 2022; Rožukalne et al., 2022). On the part of media and press councils, Austria, Bulgaria, Estonia, Germany, Hungary, and Sweden cooperate in the Media Councils in the Digital Age project. However, even outside specific projects, international exchange and activities have a place. For Poland, the normative perspective on media accountability has been shown to be strongly influenced by Western concepts—but lacks practical implementation (Głowacki et al., 2022). In Hungary, there is an awareness of international interest in the media situation in general, although not necessarily focusing on media self-regulation as the most pressing topic (Polyák et al., 2022). As Austria and Germany share a common language, they profit from common research projects and publications covering both countries (as well as German-speaking Switzerland), shared networks, and personal exchange of researchers pursuing career opportunities on both sides of the border. Against the overall diagnosis of widespread deficits in the national monitoring capabilities and professional/academic discourses on media accountability, intensification of internationally collaborative projects and exchange of experts could be a fruitful strategy to further establish the field.

## 4. Conclusions

Overall, monitoring capacities of media accountability in the countries covered by this effort are lacking to different levels and degrees. Some country cases even seem to imply a vicious circle of under-institutionalization: A limited practical interest in media accountability leads to low visibility or simply the lack of accountability instruments, which leads to a lack of academic, professional, and public resources. Without such resources or practical interest, it is difficult to establish a discourse that could also demand certain innovations in the field.

Empirical research, especially showing developments over time, is often limited to journalists' perceptions of professional ethics—sometimes produced in the context of internationally comparative projects. Where independent press or media councils produce case reports, this is another relevant source, although a more advanced analysis of these publications is rare. Overall, press or media councils and journalistic codes of ethics form the clear focus of monitoring activities on practical instruments of media accountability. This limited monitoring focuses mainly on the professional frame, which contrasts with the variety of accountability-related activities described in Section 2 of this article. Other frames and the wealth of possible instruments associated with them are scarcely covered by national monitoring efforts in most of the EU countries analyzed in the third section.

While it is beyond the scope of this article to classify all 14 EU countries under study within Fengler's (2022) eight models of media accountability, it is striking that more comprehensive monitoring capacities can be found in two of her original examples for the professional model, Estonia and Germany, and in Austria, which could be argued as close to this model since the re-foundation of its central council in 2010. The German-speaking countries also show at least some activities of monitoring public or market-based accountability, so monitoring in these countries is not limited to MAIs mainly associated with the Professional Model. In contrast, monitoring attention for the international accountability frame seems to have become extinct together with the foreign donor model in the EU, probably also a consequence of the re-nationalization of private media in CEE countries after a phase of Western-European investment (Hajek, 2015; Stetka, 2012).

Of course, and in partial defence of existing monitoring activities in EU countries, it must be noted that a monitoring system covering all instruments in all frames presented in the first part of this article is not only missing but also not realistic. It is in the nature of self-regulation that not all of these mechanisms actually exist in each country. Instead of establishing the existence and quality of data and interpretation on fixed pre-determined aspects of a media system (e.g., market data or media usage data), media accountability requires first the analysis of what practices are actually in place in order to be able to analyze the monitoring capabilities of these specific instruments. The five-frame model applied here ensures that the whole landscape of possible instruments is considered. However, when a particular instrument is not implemented or relevant in each national context, research on it is consequently limited or missing. Still, in countries with various accountability instruments in different frames, monitoring seems to lag behind this diversity and focus on the more traditional instruments.

Strong self-regulation practices in the overall regulation framework and the media system seem to also lead to the establishment of analytical capabilities—the growing Austrian discussion after the re-establishment of the press council is a topical example. But this might work in both ways. It is promising to further analyze cases in

which new accountability instruments have been successfully established to see how academic, professional, and public discourse, possibly also international exchange, fostered these innovations. The references to media accountability found in the European Commission's proposal for a Media Freedom Act might draw additional attention to existing deficits in monitoring capabilities, giving this debate an unprecedented dynamic. Suppose this initiative brought about some kind of international influence on national media accountability systems in the EU. In that case, it might well revive the debate on donor-based media accountability practices and its monitoring, just in a new, EU-driven variant.

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