[DE] KEK media concentration report documents new threats to diversity of opinion in Germany

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On 8 July 2025, the *Kommission zur Ermittlung der Konzentration im Medienbereich* (Commission on Concentration in the Media – KEK) presented its 8th report on media concentration in Germany, entitled “Social Media, AI & Co - New threats to diversity of opinion”. The Commission was established in 1997 and is responsible, on behalf of the state media authorities, for ensuring compliance with rules on safeguarding diversity of opinion in the private television sector at national level. The report, in which it examines the development of media concentration every three years, contains 316 pages of facts and analysis of both the television market and related media-relevant marketplaces such as radio, press, social media and the markets for broadcasting rights and channels.

In contrast to previous reports, various key topics were analysed in greater depth in order to highlight developments and mechanisms, identify diversity risks, provide legal classifications, discuss regulatory challenges and suggest possible solutions. In this respect, these reports are becoming increasingly risk-focused. Chapter I begins by looking at the threats to diversity of opinion, including the dangers posed by AI, disinformation and concentration processes in the media market. Chapter II describes the legal framework for concentration control and safeguarding of plurality as well as key practical elements, such as audience share calculation, programme classification and safeguarding of plurality of opinion on television. Chapters III to VI present and analyse empirical data on media use, nationwide television, national television broadcaster groups and other media markets such as streaming, radio and social media.

The central finding is that the *Medienstaatsvertrag* (state media treaty), with its focus on preventing dominant power of opinion in linear television, falls short in the digital age and no longer meets the challenges of the digital and global media landscape. Usage is increasingly shifting to mega-platforms that are increasingly delivering content with the help of algorithms and AI, a trend that the KEK has been warning about since 2018 and that calls for regulatory reform.

The RTL and ProSiebenSat.1 broadcasting groups hold largely stable market shares in private television with a combined average annual audience share of just over 35%. Public service channels, meanwhile, hold an audience share of over 50%, while many smaller providers only have a small market share. In the print

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sector, the decline in circulation continues, while the radio market shows little change. According to the KEK, the increasing influence of evolving media usage on opinion formation is worrying, especially among younger people, who are clearly turning away from linear television and increasingly using streaming services.

Traditional media offerings such as linear television and daily newspapers, which have always played a central role in information provision, are increasingly losing audience numbers and reach. Rapid digitalisation has significantly changed information behaviour in Germany, with digital offerings, especially the Internet, overtaking traditional media in some areas and becoming the main source of news and the most important medium for opinion formation. Video streaming services, search engines and social media are the main beneficiaries of this trend and are thus gaining considerable influence on opinion formation. The so-called “platform revolution”, as already described in the two previous KEK reports, is increasingly characterising the media market. Advances in the field of AI are further reinforcing this trend. AI is becoming a key technology for the creation and distribution of news, but also harbours risks for diversity of opinion. Large platform companies have enormous amounts of data that they can use to personalise content and advertising, giving them a clear competitive advantage in view of their position of power. The KEK predicts that AI’s dependence on large quantities of data will lead to greater concentration among a small number of dominant market players as a result of the power of large platform companies and media intermediaries to access such data. AI technology is helping to accelerate this concentration. The apparent diversity of Internet-based offerings often turns out to be dominated by a few large providers, who can also exert considerable influence over content and communication. This is increasing the economic pressure on the business models of journalistic and editorial media.

The Commission emphasises that safeguarding diversity of opinion in the digital space is also a constitutional requirement and warns that it needs updated, effective powers to fulfil its remit. Initial steps have already been taken at EU level through the DSA, DMA and EMFA to counter threats to diversity of opinion and disinformation. The KEK believes the EMFA, which will also have an impact on its work, has great potential to bring about comprehensive reforms to safeguard diversity of opinion in the digital age. Specifically, it thinks the federal states must focus on three areas, i.e. transparency obligations for media service providers, audience measurement regulations and merger control procedures in the media sector. In this regard, the KEK suggests, among other things, that its national media ownership database should be expanded and that it should be designated as the competent body for the independent auditing of audience measurement systems.

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8. Konzentrationsbericht „Social Media, KI & Co – Neue Gefährdungslagen für die Meinungsvielfalt“

https://www.kek-online.de/publikationen/medienkonzentrationsberichte/achter-konzentrationsbericht-2025/

8th concentration report "Social Media, AI & Co - New threats to diversity of opinion"

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