



Public Affairs
Media Policy

REPORT



Supporting the media

State measures around the world



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ABOUT WAN-IFRA

Public Affairs and Media Policy:

The news-publishing industry is experiencing transformation at an ever-quicken pace, with new policy issues arising as the landscape changes. To build its future, the newspaper industry must present a united front and develop common strategies that look beyond today's challenges and current technologies.

Our advocacy work on media policy topics focuses particularly on the issues that affect the independence of the press, thus shaping the foundations of our society. WAN-IFRA is uniquely placed to represent the newspaper industry in all global policy discussions, thanks to the authority derived from its global news media membership and the legacy of 70 years spent at the service of a free press.

To belong to WAN-IFRA is to connect with publishers' associations from around the world, to exchange information, to protect and defend common universal values, to compare strategies to better serve member publishers, and also to share data and approaches in reacting to legal and governmental measures or private initiatives that impact upon the activity of publishing.

National publishers' associations and regional trade bodies must stay ahead in this fast-moving game. WAN-IFRA's Public Affairs and Media Policy activities help members shape the right answers and remain in the driving seat of the debates on media policy issues.

To read more about our activities and access our media policy resources, go to www.wan-ifra.org/policy



Public Affairs Media Policy

within

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Preface:

The first step toward the production of this report was taken in November 2016, when one of our association members in Latin America wrote to us with an urgent request. That country's authorities were discussing a controversial tax reform that would, if approved, seriously impact the newspaper industry. Our colleagues needed to find out urgently what was happening around the world in matters of newspaper industry taxation, particularly VAT, in order to use compelling examples in their lobbying activities.



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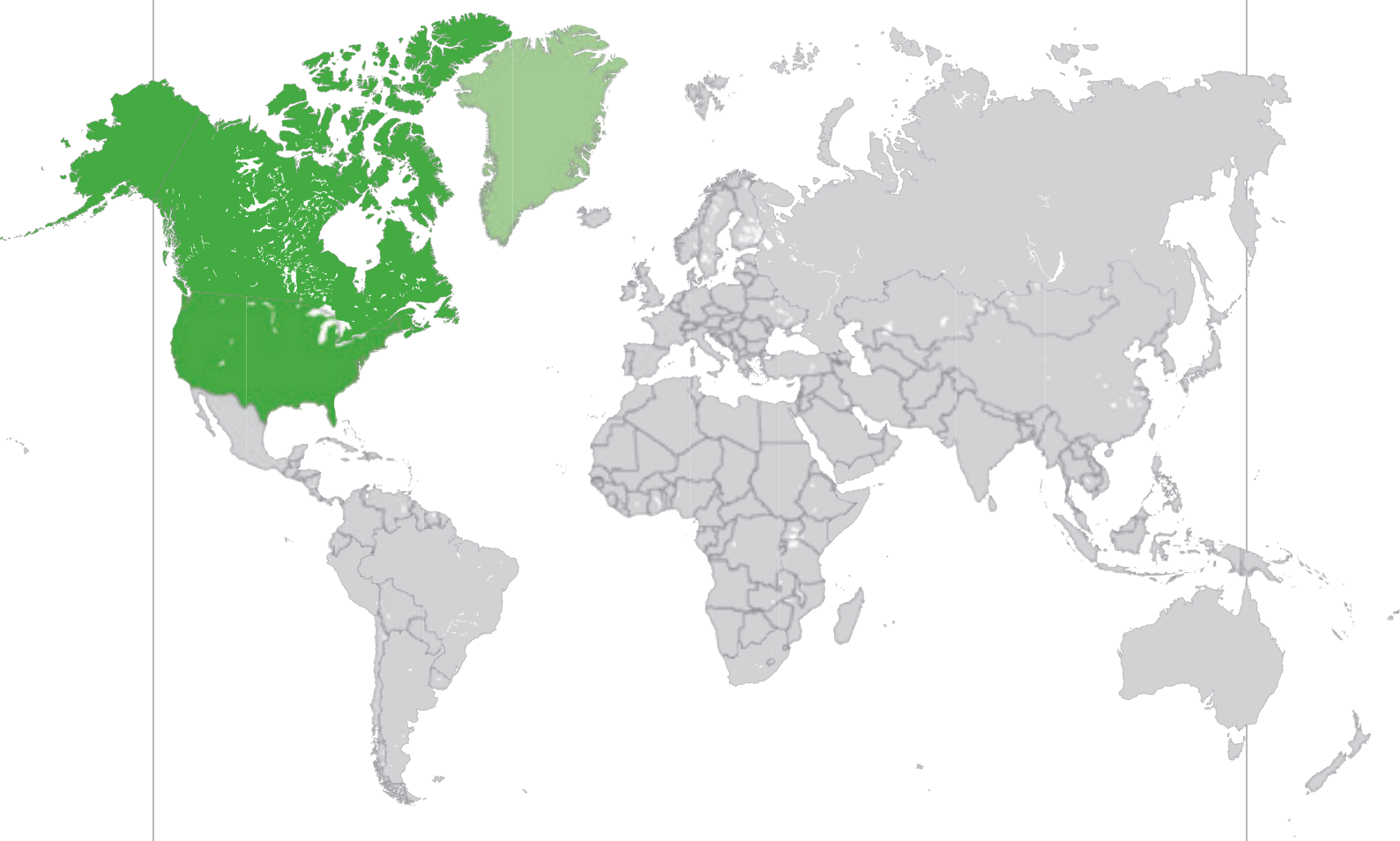
We soon discovered that material on the topic was very difficult to find, and that even in Europe, an overview on VAT rates applied to newspapers did not exist. Reduced VAT rates are a common way for governments to provide support to the press, but early on in our research, we decided to expand to also investigate other forms of support, direct and indirect, that were granted to the press in the different countries.

All the potential sources we talked to showed great excitement at the idea of a global outlook into state measures aiming to provide financial support to the news media. Thanks to a lucky turn of events at the end of 2016, WAN-IFRA's Media Policy department had the unusual availability of a little funding, which we invested in securing the collaboration of Ilaria, a great legal researcher. We started with a small investigation using internal resources, then moved to interlocutory e-mails and finally put together a proper survey, which you can find in appendix at the end of this report. Teemu and I threw all the power of our contacts into the project, from member-association directors, to World Press Trends contributors, to academics, lawyers and even just industry friends around the world.

The result of this teamwork is now in your hands. Far from covering the globe, this report indeed represents a comprehensive effort at an outlook on the different ways the news media is supported by the public sector the world over.

We hope this report will enable our members to compare their local situations with the global trends on this increasingly topical issue, and to fine-tune their lobbying at national level.

NORTH AMERICA



CANADA

In Canada there are no direct subsidies granted to daily newspapers. However, weekly newspapers benefit from a subsidiary program offered by the federal government to community-based newspapers on the basis of the number of copies sold, directed at newspapers with small circulations (fewer than 25,000 copies). The total amount of the subsidy is CAD6 million (around USD4.5 million).

There is a tax on sales at the national level (GST: Goods and Services Tax), which covers newspaper single-copy sales and subscriptions. There is an additional provincial tax (HST: Harmonized Sales Tax), part of the GST. Furthermore, states have the possibility to introduce another, separate provincial tax. Hence, the panorama varies considerably from state to state. To give some examples:

- In Ontario, the government has exempted newspapers from the provincial part of the HST
- In British Columbia and Saskatchewan, there is no provincial sales tax on newspapers (in all other provinces, newspapers pay the standard rate)
- In Manitoba, the provincial sales tax is applied to newspapers, but the government pays all newspaper-recycling levies from the proceeds.

There are no tax reductions, but their introduction is currently under discussion.

USA

In the US there are no direct subsidies, nor indirect subsidies in the form of VAT reduction/exemption.

As for indirect aid, the US Postal Service is required to promote the cultural, literary and educational value of the mail, and historically has given “preferential” mail rates to periodicals (newspapers, magazines, etc). While lower periodical mail rates help publishers, this is not a major cost saving for the industry. It mostly benefits small, rural weekly publishers that mail newspapers within a county.

A key issue for newspapers in the US is the requirement to print public notices. These do not constitute aid, either direct or indirect, in the form of tax reduction or exemption. Nonetheless, they can constitute a form of indirect help to newspapers and other media. This requirement (existing at local, state and national government level) has the purpose of informing the public about government actions through newspapers. In other words, such notices meet the legal obligation to satisfy the public’s “right to know”, and newspapers are considered as the best vehicle by which to [inform the public](#).

Some examples of public-notice requirements:

- The Treasury Department is required to notify the public through newspaper advertisements when property that has been confiscated will be sold through public auction.
- As far as migration policy is concerned, there is a public requirement providing that corporations “test the market” for qualified US citizens for available employment, before they can get government certification to sponsor a “foreign citizen” for full-time employment and residency. The purpose of this certification process is to protect US jobs and American workers. The immigration statute H1B establishes that, before offering someone a Visa, the employer is required to advertise that job in a local newspaper. This generates considerable revenue for local newspapers.
- The Health and Human Services Department is required to take out newspaper advertisements in local markets to provide ratings of nursing homes. This notice provides citizens with much-needed information as they plan for, or manage, the care of elderly family members.

LATIN AMERICA



ARGENTINA

There is a tax on sales and goods in Argentina called Impuesto al Valor Agregado (IVA). Its standard rate is 21%, but newspapers benefit from a reduced rate, depending on the company's annual turnover:

- Up to ARS63 million (around USD4 million): 2.5%
- Between ARS63 million and ARS126 million: 5%
- More than ARS126 million: 10.5%

As for advertising, the applied rates also depend on the annual turnover:

- Up to ARS63 million: 2.5%
- Between ARS63 million and ARS126 million: 10.5%
- More than ARS126 million: 21%

The same rates are applied to digital publications.

As for other indirect aid, there is a special agreement between the National Postal Service (*Correo Oficial*) and Argentinian newspaper association [ADEPA](#) (Asociación de Entidades Periodísticas Argentinas), according to which newspapers get a discount from the official tariff, based on weight. A 33% discount applies to copies weighing up to 100 grams, above which a 20% discount applies.

BRAZIL

The standard VAT rate in Brazil is 19%, but Brazilian newspapers are exempted from this tax. A lower, 3.65%, VAT rate applies to both single-copy and subscription sales. As regards advertising, no taxes are applied, nor subsidies granted.

Until 30 April 2015, Brazilian newspapers benefited from a zero tax rate for the Program for Social Integration (PIS) and the Contribution for Financing Social Security (COFINS) taxes, relative to the purchase of newsprint on both the domestic and foreign markets. This tax cut was revoked on 1 May 2016, and replaced by 0.8% PIS + 3.2% COFINS for purchase of newsprint on the domestic market, and by 0.8% PIS + 3.2% COFINS + 1% COFINS import surtax on foreign purchases.

There are other taxes levied on newspapers: a social security tax (INSS) on payroll, and a corporate tax, which is levied on all large Brazilian companies.

The system for the tax on payroll was changed in 2013. Until then, newspaper companies paid 20% INSS on their payroll. That year, a law aimed at unburdening companies traded the 20% rate on a company's total payroll for a 1% tax on its total revenue. Not all Brazilian industries benefited from this measure. The rates differ between industries, and newspapers pay one of the lowest rates.

The government revised the system again in 2016. After a significant drop in fiscal revenue resulting from the tax cut, newspapers began paying 1.5% (still one of the lowest rates). As from 2016, companies have been allowed to choose between paying 1.5% of their revenue, or 20% of their total payroll.

The corporate taxes apply to all large Brazilian companies, including newspapers, called the profit assessed on the accounting balance. These other taxes are a 15% income tax plus 10% surtax on this same tax. There is also an additional 9% tax, which is the social contribution on net profit.

CHILE

There is no direct aid provided to media organizations in Chile. However, a system of competitive funds (Fondo Concursable) was established by the Law of the Press (law 19.733 of 2001). Under this law, every year the financial law shall establish, when it deems necessary, to devote some financial resources to support launches, publication and distribution. The fund is called “*Fondo de Fomento de Medios de Comunicación Social Comunal, Provincial y Regional*”, and applies in all 15 regions of Chile.

Its beneficiaries are projects that explore the role of communications in social and cultural development, protect the identity of the region concerned, inform the economical, social and cultural context, and strengthen education. Newspapers are among the beneficiaries, together with broadcasting TV channels and radio stations. According to the law, at least 60% of this fund should be devoted to radio stations.

Newspapers and periodicals both fall under this special funding program. In order to qualify for funding, they must be at least two months old on the date the fund was approved, and published at least four times a week.

Projects are evaluated by each Regional Council, whose members are democratically elected by citizens every four years.

The fund is administrated by the government’s Secretary General. He is also responsible, together with each region, for each stage of granting this fund: application, selection and assignment.

The grant is calculated by applying an 8% discount on the expenses for the implementation, management and monitoring of the project. 10% is devoted to the region of Santiago.

The rest of the fund is divided as follows:

- One quarter will be equally divided among other regions.
- One half will be will be proportionally distributed according to the density of population and the total national amount, on the basis of data provided by the National Institute of Statistics.
- One quarter will be will be equally distributed among the nine regions of minor demographic density, on the basis of data provided by the National Institute of Statistics.

For 2017, the fund will total USD2,448,091.

As for indirect subsidies, a tax on goods and services called Impuesto al Valor Agregado (IVA) was established by Decree 825/1974. The standard rate is 19%, but books, newspapers and periodicals have been exempted since January 1977. The standard VAT rate is applied to advertising.

The rules that apply to printed publications are also applied to digital publications.

Postal services fall under the application of VAT regime, except those carried out by CorreosChile, the national postal service.

COLOMBIA

In Colombia, the sale of goods and services is generally subject to 19% VAT, or Impuesto al Valor Agregado (IVA). VAT is statutorily regulated in the Colombian [Tax Code](#) (Decree 6324 of 1989). In [January 2017](#), the standard VAT rate was increased to 19%, from 16%.

Newspapers in Colombia are generally VAT-exempted and subject to a 0% rate, which is applied to both single-copy sales and subscriptions. According to Literal (f) of Article 481 of the Colombian Tax Law, all printed newspapers and periodical publications, even if they contain advertisements, as well as subscriptions to digital editions of newspapers, magazines and books, are VAT-exempted and eligible for a bi-monthly VAT refund.

Newsprint is also generally VAT-exempted.

Advertising is taxed with the general VAT rate of 19%. However, advertising services are excluded from VAT for newspapers registering sales in advertising for the preceding year for an amount not exceeding 180,000 Tax Value Units (*Unidad de Valor Tributario*) – equivalent to USD1,785,180 for 2017 (Article 476 of the Colombian Tax Law).

During the early stages of the legislative discussions that preceded the tax reform that entered into force in January 2017, the original proposal was to erase the VAT exemption applied to newspapers, and to apply instead a new reduced and special VAT rate of 5%. [Later in the discussion](#), this aspect was removed from the tax bill, and the VAT exemption was maintained.

With regard to indirect aid other than VAT, the possibility of reduced postal rates is a controversial issue. A special law establishes a reduction, which applies to books and magazines only. It is currently being debated whether this law should be applied also to newspapers. Currently it is decided on a case-by-case basis whether the reduction applies to a newspaper title.

MEXICO

In Mexico there is no system of subsidies granted to newspapers. However, the government indirectly helps newspapers by buying Official Advertising (OA) for social communications. This happens at three different levels of government: municipal (city), state (province) and federal (national), with local and national media. Crucially, the government does not establish any preliminary criteria regarding the amount of OA bought, nor who the beneficiaries are: the decision is completely optional and discretionary. Usually, newspapers to which OA is addressed invest such money in operational costs.

Although there are no official data on the amount of OA (neither are there reliable data on advertising and subscription revenue, nor on circulations), there is a general understanding that many media organizations could not survive without OA.

Impuesto al Valor Agregado (IVA) is applied on goods and services, the standard rate of which is 16%. Newspapers are exempted from this tax, but the standard rate applies to advertising services.

URUGUAY

Under Article 62 of Act N. 13.349 of 1965, the Uruguayan government must allocate an annual amount of money to subsidize the consumption of paper, ink, equipment and in general all printing materials and graphics accessories by the press in every administrative department of Uruguay, except the capital, Montevideo. Newspapers, magazines and journals are the beneficiaries of this grant.

Regarding the paper consumption benefit, Article 63 states that it will be allocated in proportion to the amount of paper used by each company, and assigned to both imported and national paper.

With regard to the benefit for ink, equipment and other printing materials, Article 64 provides that it will be assigned to companies that during each year acquire some of the referred materials (only for the printing of their publications), and submit proof of such purchases, whose prices cannot exceed the current market price. No company can obtain more than 10% of the total benefit.

This is a selective measure, because it is addressed only to media companies located outside Montevideo, and which comply with both of the following requirements:

1. They are established or distributed in Uruguay, but outside the capital
2.
 - a. FOR PAPER AID: they have at least six months of regular publication, unless the company proves it has procured its own printing equipment.
 - b. FOR EQUIPMENT AND OTHER PRINTING MATERIALS: they have at least two years of regular and uninterrupted publication.

Beneficiaries of the grant are selected by an Honorary Commission for the Promotion of the Press located outside the capital, consisting of one delegate of the following government organizations:

- Ministry of Economy and Finance
- Ministry of Industry
- Energy and Mining
- School of Economics and Administration
- Interior Press Organization
- Media companies located outside the capital

In order to allocate the subsidy, the Honorary Commission grants each company a specific score, taking into account the following factors:

1. Space dedicated to information and comments (excluding advertisements)
2. Number of journalists, employees and workers participating in the company's activity
3. Publication's age
4. Publication frequency
5. Paper consumption
6. Whether the publication is edited on the company's own premises.

As for indirect subsidies, the standard rate of VAT is 22%. Newspapers are exempted from VAT, therefore a 0% rate applies.

Advertising and newsprint are not exempted, but the standard 22% rate is applied. However, there is a standard procedure for VAT recovery regarding acquisition of

goods in the local market and imports of goods and services for newspaper production, and companies located outside the capital have a tax exemption from the import of raw materials, machinery, spare parts and watermarked paper.

The same regime is also applied to digital newspapers, which are exempted from paying VAT.

Newspapers can also benefit from other tax exemptions if they are located outside Montevideo and have annual revenues of lower than 2 million Indexed Units (around USD250,000). If newspapers fulfill these conditions, they are exempted from Income Tax and Property Tax. Newspaper companies that are located in the capital, or that have a higher annual revenue, must pay the aforementioned taxes at the regular rate.

EUROPE



AUSTRIA

Austria has both direct and indirect press subsidies. Printed newspapers are subject to the reduced VAT rate of 10%. However, digital newspapers are taxed at the standard VAT rate of 20%.

In 2017 direct press subsidies will total EUR8.5 million. The Austrian Communications Authority ([KommAustria](#)) is responsible for administering the federal government's press subsidies.

In addition to subsidies for daily and weekly newspapers, and special subsidies for the preservation of diversity in regional daily newspapers, the [Press Subsidies Act](#) of 2004 provides a number of further measures that aim to promote quality. The publishers of daily and weekly newspapers can receive subsidies toward the cost of training new journalists. There are also subsidies for employing foreign correspondents. For the purpose of promoting the reading of daily and weekly newspapers, especially in schools, associations that define this as their sole objective can also receive subsidies.

The Austrian government is planning to reform the system around now (early 2017). Direct subsidies are under revision, according to which they will be at least doubled. Newspapers might receive more subsidies based on the number of employed journalists: the Arts and Culture Division of the Federal Chancellery wants to shift the focus away from circulation, toward the number of journalists a newspaper has hired. The other pillar of the reform will most likely be based on certain types of content and digital innovation.

BELGIUM

In the French-speaking part of Belgium, both direct and indirect subsidies are granted. Direct subsidies are available to all daily newspaper publishers that meet the requirements set out in the law (not all do). There are several factors taken into account, for example:

- Number of employed professional journalists
- Circulation
- Circulation revenue
- Advertising revenue

Whether a newspaper meets these requirements is based on newspaper associations' declarations, together with an external audit of accounting. Civil servants within the public administration conduct the evaluation. Some criteria are also checked by third parties: for instance the commission that delivers the titles of professional journalists is in charge of checking whether the employed journalists mentioned in the declarations are in possession of the official title.

The direct aid covers the operational costs, development and media innovation. There is also a specific subsidy for the internal training of journalists.

The launch of newspapers can be specifically subsidized, but no newspaper has been launched since the law was enacted in 2004.

Daily newspapers are exempted from VAT, and a 0% rate is applied to single-copy sales, subscription sales and newsprint, while the standard rate (21%) is applied to advertising.

But the 0% VAT rate is not applied to digital publications, which are subject to the standard rate.

For other forms of indirect subsidies, reduced postal service rates are granted.

Finally, journalists benefit from special conditions when using the rail network, although the rail operator regularly questions this arrangement.

BULGARIA

In Bulgaria, there are neither direct nor indirect subsidies granted to the press (either printed or digital). Although Bulgaria is a member of the EU, where the general trend is to apply a reduced or super-reduced VAT rate to newspapers, a standard VAT rate of 20% is applied.

The Union of Publishers in Bulgaria advocates for a reduction in VAT to be applied – so far without success. More policies and initiatives regarding direct government subsidies for the press are to be discussed within the national association.

CZECH REPUBLIC

In the Czech Republic, newspapers and magazines in general do not receive any subsidies from the government. Only magazines published for national minorities in their own languages (minority titles) can get grants from the Ministry of Culture. The total amount of this aid was about CZK20.5 million CZK (around EUR770,000) for all titles of this category in 2016.

There are also no indirect subsidies in the form of tax exemptions. The standard VAT rate is 21%, and a 10% rate has applied to newspapers and magazines since March 2017. Between January 2013 and February 2017, the rate was 15%. Newspapers and magazines benefited from a 5% VAT rate until 2007.

DENMARK

In Denmark, newspapers and similar publications that publish political and cultural content, employing at least three journalists, are entitled to a subsidy based on the amount they use for producing journalism. Both print and digital publications can qualify, and the total amount granted to newspapers is about EUR60 million.

There is also a development-oriented small amount of aid directed toward specific projects.

A 0% VAT rate applies to newspapers, but the standard VAT rate (25%) is applied to digital publications.

ESTONIA

In Estonia, there are two forms of direct subsidies. First, a subsidy for home delivery in rural areas is granted, amounting to EUR1.94 million. Second, EUR1.28 million is given to Foundation [Kultuurileht](#), the publisher of Estonia's main cultural magazines and newspapers.

Estonia applies a reduced VAT rate (9%) to newspapers, while the standard VAT rate is 20%.

FINLAND

A system of direct governmental press subsidy exists in Finland, addressed to newspapers in Swedish and minority languages (namely Sami, Romani and sign language) and Swedish-language news services. In 2016 the amount was EUR500,000, and the same amount is expected for 2017 because it has been the same for the last 10 years. The subsidy is not automatically given, but is granted through application.

There is a specific aid granted for media innovation, though it is not addressed only to news media. This funding was established by the Ministry of Transport and Communications, and is governed by [Tekes](#) – the Finnish Funding Agency for Innovation. During its four-year period program (2015-2018), the total sum granted will be EUR20 million.

The VAT rate for newspaper subscriptions is 10% (it was raised from 0% to 9% in 2012, and to 10% in 2013). For single-copy sales and digital editions, the standard VAT rate (24%) applies.

FRANCE

In France, there is a system of direct and indirect subsidies granted to the press as a whole, though mainly assigned to general-information newspapers and publications. This is a general measure under which the government provides financial aid to media organizations in general, not only newspapers. France's public-subsidies program represents one of the oldest systems, as it was founded in the post-war period.

For 2017, the total amount of direct press subsidies is almost EUR262 million (source: Loi de Finances 2017). In 2016 the amount was of EUR256 million. Direct credit allocations are as follows:

1. Press subsidies EUR127.84 million
 - a. Aids for distribution (aides à la diffusion): newspaper home-delivery support EUR52.96 million
 - b. Aid for pluralism: addressed to national and regional publications with a lower percentage of advertising EUR16.03 million
 - c. Aid for modernization: this could be for social modernization, distribution, dissemination, development or other innovations EUR58.85 million
2. Support to local media EUR1.58 million
3. Financial relations with the National Press Agency AFP (Agence France-Presse) EUR132.48 million. Broken down into two sections: a EUR21.66 million allowance as a contribution for AFP's services provided to the French Administration (subscriptions), and a EUR110.82 million compensation for its public-interest mission.

Newspapers also benefit from indirect aid, such as reduced postal rates. A fund is provided to *La Poste*, which allows a discounted rate to be applied to newspapers.

The standard VAT rate is 20%, but newspapers benefit from a lower VAT rate of 2.1%. This is applied both to single-copy and subscription sales. But for advertising, the standard rate applies. This regime was previously applied to printed publications only, but in 2014 France started applying the 2.1% VAT rate also to digital newspapers, contrary to the EU VAT Directive 2006/112. By doing this, France fell under procedure of infringement. The European Commission and later the European Court of Justice condemned France ([Case-479/13 Commission v. France](#)) because this behavior violated EU law. A reform, currently under discussion at the Council of the European Union, should authorize the reduced VAT rate for online publications within the EU.

GERMANY

There are no direct subsidies in Germany. As far as VAT (Value Added Tax) is concerned, a 7% rate is applied to newspapers, while the standard VAT rate, applied to goods and services in general, is 19%. The 7% rate is applied to both single-copy and subscription sales, and the 19% rate applies to advertising. The standard rate is also applied to digital publications.

As for other indirect subsidies granted to newspapers in the form of a tax relief, there is a reduction on postal rates.

HUNGARY

There is no direct aid provided to the press in Hungary. The government indirectly helps newspapers by applying a reduced VAT rate of 5%. However, the standard VAT rate of 27% is applied to advertising and newsprint.

On 17 June 2014, Act XXII on Advertisement Tax was enacted. The law applies to any person or organization publishing advertisements or commercial announcement. It is also applicable to newspapers, and more generally concerns press publishers and commercial television channels. Under the law, “advertising” means any economic advertisement as defined in the Act on the Basic Conditions of and Certain Restrictions on Economic Advertising Activities and Commercial Announcements, as defined in the Act on Media Service Providers and Mass Communication.

The law has a broad application scope: any person who maintains a website, or who prepares and distributes a brochure or flyers to promote their activity, becomes subject to advertisement tax. As most business entities advertise themselves in some way, many subjects fall under its scope of application.

The law establishes some tax reliefs for companies if their tax is lower than HUF500 million (around EUR1.6 million). However, they are not relieved from the administrative obligations if they qualify as

- Media content service providers as defined in the Act on Media Service Providers and Mass Communication established in Hungary;
- Media service providers making media content available in the territory of Hungary in the Hungarian language, in at least half of their daily broadcasting time;
- Publishers of press products not qualifying as media service providers;
- Persons or organizations utilizing any outdoor advertisement carrier or any vehicle, printed material or property for the placement of advertisements;
- Publishers of advertisements in the case of advertisements published on the internet.

In 2014, the [European Commission found](#) that the Hungarian ad tax was in breach of EU state aid rules because its progressive rates granted a selective advantage to certain companies. According to the EU institution, the law had potential distortive effects on competition. Due to the commission's position on the distortion caused by progressive tax rates, Hungary later needed to collect payments from those companies that had paid less advertising tax than they would have had to pay with the fixed rate, and to reimburse those companies that had paid more than they would have otherwise had to. Therefore, on 27 May 2015 the Hungarian Parliament enacted a new law, under which a 5.3% fixed rate for the advertising tax bases above HUF100 million was applied. Tax bases up to HUF100 million continue to be taxed at 0%.

In 2015, the current tax rate and the newly proposed fixed tax rate were both applied, but the new rate is applicable only to the proportionate part of the annualized tax base calculated after the day on which the bill entered into force.

IRELAND

In Ireland there are no direct press subsidies granted by the government.

As for indirect subsidies, a lower VAT rate of 9% is applied, instead of the standard rate of 23%. The lower rate was previously 13.5%: a temporary reduction was introduced in 2011, which is still in place but subject to annual review at the time of the approval of the budget.

ITALY

A system of direct press subsidies in Italy was established in 1981, when [law 416/1981](#) was approved. Subsequently, in the 1990s, a selective measure was established to grant aid to special categories of newspapers. The three categories are:

- Newspapers representing a political party
- Cooperatives of journalists
- Newspapers representing a language minority or Italian communities abroad
- This so-called “grant” is in reality a reimbursement, since the aid is given the following year, for the previous one. Its amount is calculated based on a newspaper's sales, distribution and costs of production during the previous year.
- In 2012, two new requirements were introduced:
- A minimum percentage relationship, changing yearly, between copy circulation and printing, depending on whether the newspaper is a local or a national newspaper.
- A minimum number of employees, changing yearly, the majority of them needing to be journalists hired on a permanent contract.

Recently, a new aid, addressed to newspapers investing in e-publications, was introduced, to cover 70% of investment costs, with the possibility to add 10% if digital copies are sold by subscription.

Generally, direct aid granted by the Italian government has decreased steadily since 2010. The basic principle that the Italian law applies to direct press subsidies is that, when the national fund cannot cover all newspapers falling under the requirements and the categories aforementioned, the total amount of the aid is reduced proportionally among all beneficiaries. In other words, no newspaper is excluded, but all will receive a lower aid.

In 2015, the amount of direct aid totaled EUR42 million.

In October 2016, the Italian Parliament approved a law (“legge delega”) by which the government was asked to revise the aforementioned legislative framework with the explicit mandate to maintain direct subsidies just for newspapers of political parties, and consequently erase from the beneficiaries those newspapers issued by cooperative of journalists, newspapers representing language minorities and newspapers addressed to Italian communities abroad.

As for indirect subsidies, newspapers benefit from a reduced VAT rate of 4% (the standard rate is 22%). This is a general measure applying to all print publications that have the price and the name of the author displayed on the cover. In 2016, Italy started applying the same reduced VAT rate both to print and digital publications (contrary to the EU VAT Directive).

Until 2010, newspapers benefited from reduced postal rates for delivering subscriptions. This aid has been interrupted since 2010, and the situation is reviewed annually.

Finally, reduced telephone rates are granted to newspapers.

LUXEMBOURG

In Luxembourg, both direct and indirect subsidies for the press exist.

To qualify for direct aid, a daily newspaper must fulfill specific conditions. It has to be a paid newspaper and employ at least five professional journalists. Additionally, it must contain general information and be published in one of the three languages used in the country (German, French or Luxembourgish). The same requirements also apply to weekly newspapers.

The total amount of the aid given is EUR7.4 million. For medium-sized companies, the direct aid represents about 10% of the general turnover. For smaller newspapers this aid can be quite vital.

The aid is composed of two parts: a basic subsidy, which is the same for all newspapers, and a second part, calculated on the basis of published pages.

In 2016, the government decided to give direct aid to electronic publications. The maximum amount per publication is EUR100,000. Conditions: employ at least two journalists, publish “original content of quality,” and have at least EUR200,000 invested every year by the publisher. For 2017, an amount of EUR450,000 has been foreseen in the budget of the Ministry, but it could be too low if we consider all electronic publications that could fulfill the conditions. The first aid of this type will be paid in 2017.

The standard VAT rate is 17%, while a rate of 3% applies to newspapers. Additionally, there is an indirect aid for distribution.

Another indirect aid is the obligation for a commercial company to publish its legal announcements in the press. However, a new commercial law, voted in August 2016, reduces the former obligations by 50%.

THE NETHERLANDS

There is no direct aid for the press in the Netherlands.

As for indirect subsidies, newspapers benefit from a lowered VAT rate of 6% (the standard VAT is 21%). The standard VAT rate applies to digital publications.

There is a state fund for innovation in journalism, with a modest annual budget. Initially it was supposed to support just the press, but it was opened also to public journalistic organizations a few years ago. Now public broadcasters can apply for subsidies for innovation projects in the field of journalism.

NORWAY

There are direct subsidies granted to newspapers in Norway. These are production grants: every newspaper with a circulation of less than 6,000 receives aid from the government. For newspapers ranked second in their local market (based on circulation), additional aid is granted.

The value of the grant is NOK313 million (around EUR33 million).

Newspapers benefit of VAT exemptions both for printed and digital publications: While the standard VAT rate is 25%, a 0% rate applies to printed and digital publications.

PORTUGAL

Aid to the press in Portugal is ensured by the Constitution, which stipulates that the state has an obligation to support the press. Therefore granting subsidies to the press is not a favor from the government, but is written into constitutional law. Concretely, there is direct and indirect state aid, giving support of EUR1.5 million to local and regional newspapers, and to local radio stations. National newspapers are exempted from this state aid.

To qualify for aid, publications need to employ a certain number of journalists and sell a certain number of copies. Between 120 and 150 newspapers benefit from the aid. Last year the government also gave the possibility to grant aid at a regional level, to increase the amount of aid available to newspapers.

As for indirect state aid, 40% of the costs of postal distribution of local and regional general-information newspapers (in the country and for abroad) are paid by the government.

A reduced VAT rate of 6% is applied to print newspapers and magazines, while VAT for digital editions is the standard 23%.

RUSSIA

Russian media organizations are supported through direct subsidies by regional governments and local authorities, by using the following types of direct aid:

- Contracts for information support to authorities and governments' activities, signed through a procurement system. These contracts are usually called "informational contracts"
- Targeted subsidies for the media
- Untargeted subsidies for the media
- Grants
- "Commercial contracts" when regional governments and local authorities pay for the placement of advertising
- Contribution to the charter capital of the media (rarely used)

The most popular types of direct support to media organizations are the so-called "informational contracts," signed through a procurement system, and targeted subsidies. Moscow is the region that grants the highest volume of direct subsidies to media.

Subsidies are predominantly granted to media founded by the state, as such, these media receive about 82.4% of the total allocated budget.

In terms of different types of media, the budget is divided as follows:

- Regional television: 34.8%
- Regional inserts on federal TV channels: 26.5%
- Printed media: 26.6%
- Special printed media, such as national newspapers, publications for children, publications for disabled people: 8.3%
- Online media: 3.9%

The budget funds are allocated for the following purposes:

- Covering the majority of the regional subjects and events
- Information support of the activities of regional authorities
- Support to media under governmental programs
- Support to social projects and initiatives in the media

At the federal level, the Federal Agency for Press and Mass Communications annually provides the regional and local media with grants for supporting social projects, meant to cover the costs of preparing and publishing socially significant materials, insurance, printing distributing publications. The grants are allocated on the basis of transparent and strict criteria of open competition by an independent commission, consisting of representatives of the government, NGOs and journalists.

At the regional level, each region can create its own mechanism for supporting the media. In most cases, such support is organized by regional governments themselves.

As for indirect subsidies, there is a tax applied to the sales of goods and services, called NDS. The standard rate is 18%, but newspapers benefit from a reduced rate of 10% for distribution. However, the standard rate applies to newspapers that include advertising or erotic material.

In some regions, authorities indirectly support media organizations and journalists by granting the following benefits:

- Exemption from property tax law, low rate of income tax for media (Rostov region and Yamalo-Nenets district)
- Partial reimbursement of the cost of production and distribution of print media (Voronezh and Rostov regions)
- Benefits for the rental of offices at the municipal level (Vladimir region)
- Provision of media employees with serviced housing, reimbursement of training costs, professional awards and prizes to the best journalists (Magadan, Samara, Sakhalin and Tula regions, the Nenezky AO and Jamalo Nenezky AO)
- Support for families of journalists killed in the line of duty (Kemerovo region).

The Russian Post (the national postal operator) also provides the media with benefits. The advisory council of the Russian Post approves, periodically, a list of print media that are eligible for a discount: the cost of delivery is reduced by 5% for federal publications and by 10% for regional and local media. The eligible newspapers should be at least five years old, be clear of any Russian legislation violation, and fulfill one the following conditions:

- Their content reflects social problems, ethical and religious-tolerance principles
- Their mandate is to fight extremism
- They implement projects addressed to children
- They promote “patriotic education, moral traditions, family relations and healthy lifestyle”

SPAIN

There are no direct subsidies for the press in Spain.

As an indirect aid, there is a reduced VAT rate for printed publications (4%), while the standard VAT rate of 21% applies to digital publications.

SWEDEN

In Sweden, the standard VAT rate is 25%, but the VAT rate for print newspapers is 6%. However, the standard rate is applied for digital publications.

Sweden's national newspapers association is currently urging the government to take a lead in supporting the recent proposal from the European Commission to open up the VAT Directive, so that member states of the EU can apply the same reduced VAT (or zero-rate) for digital newspapers, which they can do for their printed versions.

Regarding direct subsidies, there is a new report from a governmental commission proposing to increase press subsidies, while also allowing many more newspapers to apply for these subsidies, which are meant to be more project-focused. Today the beneficiaries are print newspapers, but in the future, digital newspapers will also be included, along with free newspapers and news agencies. According to the government, this new system will start working in January 2018. This date is not realistic. The association is discussing this issue, and there will be several more meetings to come.

Today, the VAT rate for print in Sweden is 6%. For digital publishing the standard VAT of 25% is applied. This issue is now the top priority for the Swedish association.

SWITZERLAND

There are no direct subsidies for newspapers in Switzerland.

For indirect subsidies, there is a distribution fee, which applies to every newspaper, but certain newspapers can benefit of a discount (per day and per copy). This relief is ensured by granting CHF50 million (around EUR46 million) to the Swiss Post, which then grants appropriate discounts to qualifying newspapers and magazines.

Article 16 of the Post Law ([Loi sur la Poste](#)) – the legal basis for these indirect press subsidies – breaks down the CHF50 million per year as follows:

- CHF30 million a year for the local and regional press
- CHF20 million a year for magazines and newspapers from associations and foundations

In 2017, 142 local and regional press titles, and 1,046 magazines and newspapers from associations and foundations, will benefit from this indirect aid.

Not all newspapers can benefit from a discount. Article 36 of the [Ordonnance sur la Poste](#) lists all the required conditions.

For indirect subsidies, the standard VAT rate is 8%, but print newspapers and magazines benefit from a lower rate (2.5%). Until next year (1 January 2018), sales of electronic publications of newspapers and magazines (both as apps and e-papers) are subject to the standard rate, after which the same lower VAT rate will apply both to printed and digital publications.

UKRAINE

There is no direct aid to the press in Ukraine.

The standard VAT rate of 20% is applied to newspapers. There is a 0% rate applied to single-copy sales and subscription sales, while the standard 20% rate is applied to advertising and newsprint. The same 20% VAT rate is applied to digital publications.

As for other forms of indirect subsidies, there is a special postal tariff applied to newspaper delivery when newspapers and magazines are sent in the form of a pack (a “newspapers pack”) and not when a single copy is delivered (the “universal postage service”). When these packs are delivered, it requires particular postal logistics – therefore a special tariff applies.

UNITED KINGDOM

The UK traditionally does not apply special press subsidies, and UK newspapers do not receive funds from the government.

The UK has maintained zero-rate VAT, which applies to the printed word, including the cover price of books, newspapers and magazines. This is strongly supported by the UK industry. The standard VAT rate applies to digital publications and to advertising. The UK industry would welcome the extension of zero-rate VAT to digital publications, provided that zero-rate VAT is maintained for print titles.

The government will introduce a temporary GBP1,500 business-rates discount for office space occupied by local newspapers in England, up to a maximum of one discount per local newspaper title and per hereditament, and up to state-aid limits, for two years from 1 April 2017. This will be delivered by local-authority discounts, similar to those for support of cafes, shops, pubs etc.

The local authority will be reimbursed by government. The discount will be available to properties wholly or mainly used as office premises for journalists and reporters. This will help to support the aims of the relief, as set out in the original consultation document, in helping local newspapers to maintain a physical presence on the high street. The purpose of any relief would be to help local newspaper publishers as they adapt to industry changes and put themselves on a long-term sustainable financial footing. This is the reason why the relief would be on a temporary basis, and why it does not apply to digital newspapers or magazines or council publications.

The News Media Association and the BBC have entered a joint partnership agreement, which is being rolled out in 2017. This encompasses the BBC's funding, from the BBC license fee, of 150 local-democracy reporters to be employed by local news organizations, and the establishment of a BBC news video data bank that local news organizations may use. The agreement also encompasses a shared data-journalism hub, to which journalists will be seconded and which will generate data journalism for common use, provide training and develop data journalism tools. It will also include the conduct of an audit of the BBC's usage of local press material, in order to improve acknowledgment and links.

AFRICA



ETHIOPIA

The Ethiopian government does not provide aid to media organizations. Private media organizations are not supported in any form, and they are not allowed to receive funds from either the government or foreign entities.

Government media receives annual budgets. These are addressed to

- Ethiopian Broadcasting Corporation (EBC) as public service broadcaster
- Government owned radio stations such as Ethiopian Radio and FM 97.1
- Ethiopian Press Agency
- Ethiopian News Agency

The Ethiopian Press Agency publishes newspapers such as [The Ethiopian Herald](#) (English Daily), *Addis Zemen* (Amharic daily), *Zemen* (a monthly Amharic magazine), and party newspapers such as *Abiyotwi Democracy*.

The aforementioned media organizations work for the government/ruling party, and private investors cannot intervene by any means. Moreover, they cannot receive any funds from foreign sources.

It should be noted that a government directive establishes that the percentage of editorial content must be 60% greater than the advertised content.

Journalists working for the government are fully covered for any costs regarding operation, distribution, media innovation, training and reorganization of the newspapers they work for.

In Ethiopia, no indirect subsidies exist. Indeed, public newspapers receive their budget directly from the government. As for private newspapers, the tax system is based on the number of printed copies, rather than on the number of copies sold. This number is communicated to the government by Berhanena Selam, a government-owned printing press. On the basis of the number of printed copies, the government taxes private media organizations. So if copies are printed but are later returned unsold by street vendors, newspapers are still taxed, because the criterion is the number of copies printed.

KENYA

The Kenyan government does not provide any aid to media organizations. There are “public” media that the state directly owns: the *Kenya Broadcasting Corporation*, the *Kenya News Agency* and, a recent addition, *MyGov*, an eight-page publication of the Government Advertising Agency.

Public news media are directly financed by the government. Privately owned media, on the other hand, do not receive any form of support and have to survive on their own.

Media conduct is regulated through the Media Council of Kenya, which is both government- and donor-funded. Due to the government’s involvement, this system is referred to as co-regulation. Members of the Media Council are appointed directly by the government.

In Kenya, there is a tax on sales and goods, the standard rate of which is 16%. Newspapers do not benefit from any reduction or exemption, but the standard rate is applied to single-copy sales, subscription sales, advertising and newsprint.

SOUTH AFRICA

The South African government does not provide any form of financial support to the media.

But there are some related aspects to consider. The media landscape lacks pluralism, and in print media in particular there is a notable lack of diversity in content and viewpoints, such as those of poorer people, people in rural areas, and social movements. This lack of diversity is due to a media landscape dominated by [four big media houses](#): Media24, Caxton, Times Media and Independent News & Media SA. There is a structural problem in the market, rooted in the structure of national competition law. Indeed, when independent newspapers become successful, they are likely to be bought by one of the four groups. Therefore, the newspaper market is highly concentrated in ownership.

The [African National Congress \(ANC\)](#) has recognized a threat to media pluralism in the market structure. This has caused growing tensions between mainstream media and the governing party. In 2003, the government instituted, by way of the MDDA Act n.14 of 2002, a media-subsidy scheme via the [Media Development and Diversity Agency \(MDDA\)](#) for smaller and independent media in order to promote access to those groups who lack a viewpoint in the media landscape. MDDA is a statutory development agency for promoting and ensuring media development and diversity. It is a partnership between the government and major print and broadcasting companies

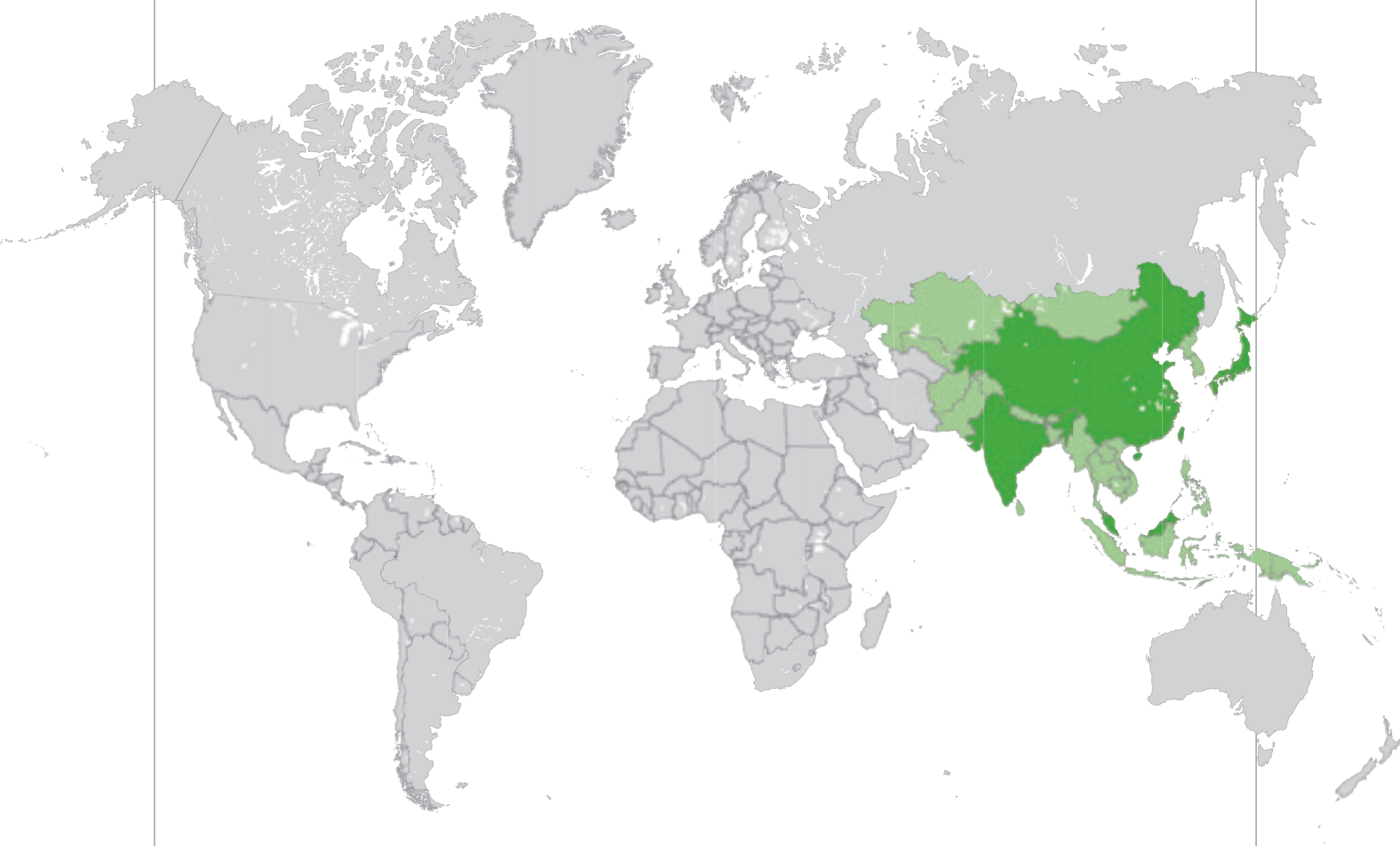
to assist small commercial media companies, with the ultimate goal of promoting media pluralism. The initial project was to give the MDDA regulatory powers to intervene in the industry, such as the power to declare illegal anticompetitive agreements (cartels) between media companies. In addition, a statutory levy on corporate media was established, in order to subsidize community media. But both projects met strong opposition, and were abandoned.

The model established in the final act gave the MDDA the [mandate](#) to support and fund independent media representing:

- Historically disadvantaged communities
- Diminished language and cultural groups
- Inadequately served communities.

The agency has historically been used to fund both community broadcasting and community and small commercial print publications. Due to a number of factors including the economic downturn, mainstream print media had stopped funding the MDDA by 2014. But the agency has remained able to support print media, due to the grant transfer it receives from the Department of Communications. This has been a choice that the MDDA has made, even though the measured results are not very effective. Therefore, the MDDA has also embarked on various fund-raising initiatives that it hopes will enable it to extend support to the broadcast and print media sectors.

ASIA



CHINA

As for direct subsidies, most mainstream newspapers in China have stopped receiving financial support from the government since the 1990s, following a market-oriented reform.

Some newspapers have started seeking financial support from the government in recent years, due to the decline of the newspaper industry and the need to invest in digital projects. One recent example is that of Guangzhou Daily Press Group, the first mainland newspaper group, which received CNY350 million (around USD51 million) from the local government in December 2016 to offset losses in printing and circulation. Moreover, [Jiefang Daily](#) and Wenhui Daily, two top newspapers in Shanghai, have been getting CNY50 million from the city government since 2013, after they merged into Shanghai Press Group in October that year.

Additionally, some national news organizations have received funds for digital transformation projects.

Newspapers can benefit from some forms of tax reductions, but this does not constitute as big a help as it does in many other regions, such as Europe. Tax reductions are addressed just to special categories of newspapers, such as the Chinese Communist Party-owned newspapers ([People's Daily](#)). These publications have not needed to pay VAT, starting from 2016. VAT was introduced in China five years ago, and the standard rate is 17%.

It should be borne in mind that there are no data available on press subsidies in mainland China.

INDIA

In India there is no financial aid granted by the government, either central or federal.

As for indirect subsidies, there is no tax on newsprint, on the sale of newspapers or on advertising in newspapers.

By April 2017, a GST (Good and Services Tax) was set to be introduced. It is uncertain whether newspapers will be subject to the standard GST rate, whether they will benefit from a reduced rate, or whether they will be totally exempted. The Indian Association of newspapers is currently lobbying to maintain the present taxation system.

JAPAN

At present there is no financial aid provided to Japanese newspapers in any form, either direct or indirect.

In October 2019, Japan will raise the tax on sales rate from 8% to 10%. However, the government will introduce a reduced tax rate of 8% on newspapers, food and beverages.

The subject of reduced tax rate is defined as paid-for newspapers that have a certain title (i.e. those which use the same title consistently), which include articles about general facts including politics, economy, society and culture, and which are issued at least twice a week.

MALAYSIA

In Malaysia, the government provides no aid to newspapers. However, financial aid is provided by state news agencies or the national newswire. Moreover, government agencies subscribe to the newspapers owned by the ruling party UMNO (United Malaysian National Organization), constituting an indirect aid for them. Most newspapers are owned, directly or indirectly, by political parties or individuals with a political interest. The Malaysian Printing Presses and Publications Act (PPPA) establishes a legal requirement for newspapers to register, making it impossible for newspapers to remain in the dark.

As for indirect subsidies, the standard VAT rate is 6%, but news products are totally exempted from VAT, therefore a 0% rate is applied. However, the standard rate is applied to advertising and to digital publications.

TAIWAN

There is not now, nor has there ever been, any direct aid to the Taiwanese press. But VAT is never applied to newspapers, while the standard rate applied to goods in general is 5%.

OCEANIA



NEW ZEALAND

The New Zealand government does not subsidize print media. However, it funds the national radio broadcaster RNZ (previously Radio NZ), which has a significant newsroom. The state owns two national television channels, but they are run along commercial lines, funded by advertising. The state agency NZ on Air provides government funding for the reproduction of local television, including current affairs. The government and private TV channels are able to apply for funding from this source, as are print-media companies that own video outlets.

There is a tax on sales and goods (Value Added Tax), the standard rate of which is 15%. The same rate is applied to newspapers.

Annex I: Sources

NATIONAL NEWS MEDIA ASSOCIATIONS:		
ARGENTINA	Asociación de Entidades Periodísticas Argentinas (ADEPA)	www.adepa.org.ar
AUSTRIA	VÖZ - Verband Österreichischer Zeitungen	www.voez.at
BELGIUM	LaPresse.Be	www.lapresse.be
BRAZIL	Associação Nacional de Jornais	www.anj.org.br
BULGARIA	Union of Publishers in Bulgaria	www.sib.bg
CANADA	News Media Canada	www.nmc-mic.ca
CHILE	Asociación Nacional de la Prensa (ANP)	www.anp.cl
COLOMBIA	Asociación de Diarios Colombianos - Andiaros	www.andiaros.com
CZECH REPUBLIC	Unie Vydavatelů	www.unievydavatelů.cz
DENMARK	Danske Medier	www.danskemedier.dk
ESTONIA	Eesti Ajalehtede Liit (EALL)	www.eall.ee
FINLAND	Sanomalehtien Liitto	www.sanomalehtien.fi
FRANCE	Union de la Presse en Région (UPREG)	www.upreg.fr
GERMANY	Bundesverband Deutscher Zeitungsverleger (BDZV)	www.bdzv.de
HUNGARY	Magyar Lapkiadó Egyesülete	www.mle.org.hu
INDIA	Indian Newspapers Society	www.indiannewspapersociety.org
IRELAND	NewsBrandsIreland	www.newsbrands.ie
ITALY	Federazione Italiana Editori Giornali	www.fieg.it
JAPAN	The Japan Newspaper Publishers & Editors Association (NSK)	www.pressnet.or.jp
LUXEMBOURG	Association Luxembourgeoise des Editeurs de Journaux (ALEJ)	www.editpress.lu
NETHERLANDS	NDP Nieuwsmedia	www.ndpnieuwsmedia.nl
NEW ZEALAND	Newspaper Publishers' Association (NPA)	www.npa.co.nz
NORWAY	Mediebedriftenes Landsforening (MBL)	www.mediebedriftene.no
PORTUGAL	Associação Portuguesa de Imprensa (API)	www.apimprensa.pt
RUSSIA	Alliance of Independent Regional Publishers	www.anri.org.ru
SOUTH AFRICA	Association of Independent Publishers (AIP)	www.printmedia.org.za
SPAIN	Asociación de Editores de Diarios Españoles (AEDE)	www.aede.es
SWEDEN	Tidningsutgivarna (TU)	www.tu.se
SWITZERLAND	Médias Suisses	www.mediassuisses.ch
UKRAINE	Ukrainian Association of Press Publishers (UAPP)	www.uapp.org/english.htm
UK	News Media Association	www.newsmediauk.org
USA	News Media Alliance	www.newsmediaalliance.org

SPECIAL THANKS TO		
Emrakeb Assefa	The African Editors Forum (TAEF), Addis Abeba University	www.aau.edu.et
Stephania Bresque	Ferrere Abogados, Uruguay	www.ferrere.com
Chien-sang Feng	Journalism Professor, National Cheng Chi University	Taiwan
Javier Garza	WAN-IFRA Regional Manager for Latin America Strengthening Media and Society project	Mexico
Xiaojin Gu	Shenzen University, School of Media and Communication	China
Cheryl Langbridge	Media Development and Diversity Agency (MDDA)	www.mdda.org.za
Wangheti Mwangi	African Media Initiative	www.africanmediainitiative.org
Lina Nursanty	Head of WAN-IFRA Media Freedom Committee	Indonesia
Adrian López Ortiz	Editorial Noroeste, Mexico	www.noroeste.com
Santiago Osorio	Posse Herrera Ruiz Law firm, Colombia	www.phrlegal.com
Aidila Razak	Journalist, Malaysiakini	www.malaysiakini.com
Javier Fernández-Samaniego	Abogado, Samaniego Law, Miami Florida	www.samaniegolaw.com

Annex II:

Contributors survey

DIRECT SUBSIDIES

1. Does the government provide direct aid to media organizations?
2. If so, do newspapers (daily or non-daily) benefit from a particular regime compared to other media organizations (for example, magazines)?
3. Is this a GENERAL MEASURE (granted to any newspaper) or a SELECTIVE MEASURE (addressed to special categories of newspapers)?
4. Is the government directly responsible for evaluating newspapers, or are the beneficiaries selected by an INDEPENDENT COMMITTEE/ SEPARATE GOVERNMENT BODY?
5. How is the amount of the GRANT CALCULATED?
 - 5.1 Is it proportional to the amount of editorial content produced?
 - 5.2 AND/OR to the size of the subscription base?
 - 5.3 AND/OR circulation?
6. What does the direct aid cover?
 - 6.1 Cost of operation?
 - 6.2 Cost of distribution?
 - 6.3 Development/ media innovation?
 - 6.4 Internal training of journalists?
 - 6.5 Is it designed to help new entrants into the market/ the reorganization of existing newspapers?

INDIRECT SUBSIDIES

VAT

- Is there a tax on sales and goods (called VAT in Europe)?
- What is the standard rate?
- Which VAT rate is applied to newspapers?
 - Is the standard rate applied to newspapers?
 - Is a reduced VAT rate applied?
 - VAT on single-copy sales?
 - VAT on subscription sales?
 - VAT on ADVERTISING?
 - VAT on NEWSPRINT
 - If yes, is this rate applied to digital publications as well?
 - Are newspapers totally exempted from VAT?

OTHER TAX RELIEFS

1. Reduced postal rates
2. Reduced telephone rates
3. Reduced corporate tax on revenues
4. Reduced tax on payroll

Other remarks: political/historical issues, characteristics of the market concerned etc.



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