An In-Depth Look at Media Subsidies in Spain's **Autonomous Communities in 2019**

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This article focuses on public subsidies for the communication media in Spain for the year 2019, presenting an in-depth analysis of the situation. State subsidies for media is a phenomenon that became widespread in Europe during the 1960s and 1970s. In Spain, they were regulated in the 1980s, but shortly thereafter the state almost completely halted its support, and it was Spain's autonomous regions who then promoted the subsidies. In the midst of the professional debate about whether it is possible to reinstate this support from the Spanish government because of the coronavirus crisis, we identify nine autonomous regions which promote these types of subsidies. Through a study that is both prospective and propositional, our analysis will thoroughly examine the institutions granting subsidies, the sectors benefiting from them, their aim and justification, and the margin of discretionary compliance with which they are granted.

Keywords: communication media, public subsidies, autonomous regions, regulation.

BACKGROUND

Within the context of economic crisis during the 1960s and 1970s, media subsidies became a generalised phenomenon in Europe. Since then, it has survived throughout much of the continent, backed mainly by the 'fostering of pluralism' argument (Mateo, 1990). This, however, has led to two stances on the issue: protection and liberalism. The first advocates State responsibility

for the media, whereas the second denounces the perversions generated by the acceptance of public subsidies (Almiron, 2008), thus giving rise to the debate about guaranteeing access to the media on the one hand, and government interference on the other (Colino-Fernández, 2013; Arribas-Reyes, 2014). Moreover, the effectiveness of such subsidies has been questioned (Ballester-Esquivias, 2009).

A historical distinction has been made between the various types of subsidy: indirect subsidies, aimed at making structural improvements to the sector as a whole, and direct subsidies, granted directly to a media outlet. This article retains this classification and adheres to the categorisation of subsidies into automatic ones, which are determined by objective criteria, and selective ones, when the public authority issuing a call for applications has a considerable margin of discretionality (Murschetz, 1998).

The United Kingdom, Germany, Ireland and Switzerland have opted for indirect subsidies (Fernández-Alonso and Blasco-Gil, 2006), whereas other countries such as France, Belgium and Portugal have supplemented such subsidies with direct ones (Murschetz, 1998; Aguado, 2008). Among the former, the most common ones in Europe are the application of reduced VAT rates, access to reduced postage tariffs and lower taxes for advertising in certain types of media. Direct subsidies vary considerably throughout the continent, but standing out among them are subsidies for non-leading publications or those with minimal advertising resources, subsidies for improving editorial quality, and other subsidies linked to dissemination (Fernández-Alonso and Blasco-Gil, 2006).

Within this context, several types of press subsidy were introduced in Spain in the 1980s, such as those for circulation, for consuming nationally produced press paper, and for technological restructuring (Fernández and Santana, 2000). In fact, they became regulated by Law 19/1984 on subsidies for journalistic firms and news agencies. However, based on the sector's economic improvement, the government abolished direct subsidies in 1988 and later did away with many of the indirect ones, with the exception of reduced postage tariffs and the application of a reduced VAT rate of 4%, which are still in force in 2020. The financial and structural crisis of the press in recent years (Mateo, Bergés, and Garnatxe, 2010; Campos-Freire, 2010) has led to increased pressure from publishers on the issue of public policies of support for the sector (Arroyo-Cabello, 2006; Campos-Freire, 2011), in an attempt to save media outlets (Cagé, 2016) and allow them to adapt to new technological environments (Bustamante, 2008).

Given the current coronavirus crisis, the Government of Spain has approved¹ an aid package amounting to €15 million to support national digital terrestrial television (DTT) providers (Official Gazette of the Government of Spain, 2020a). Newspaper and periodical publishers, which together form a highly fragmented sector, have also taken a major hit during the pandemic.

¹ The granting of subsidies under the plan is pending regulation.

And this has led to petitions from the sector's business associations and works councils for an emergency press aid plan. One example is the petition promoted jointly by the Spanish Association of Periodical Publishers (AEEPP), the Information Magazines Association (ARI), the Professional Press and Multimedia Content Association (CONEQTIA) and the Association of Cultural Magazines of Spain (ARCE). These four associations represent over 260 publishing groups with more than 1,500 titles between them. However, the publishing sector is not the only one to demand assistance; so too have the Commercial Radio Broadcasters Association (AERC), the Associated Commercial Television Union (UTECA) and, more generally, the Federation of Journalist Associations of Spain (FAPE). ² These petitions have been motivated by falling advertising revenues and the announcement of redundancies, which have led the government to prepare a sector aid plan (Official Gazette of the Government of Spain, 2020b).³

Until then, the Spanish Administration has left it up to autonomous communities to grant subsidies to the media (Morales, 2006; Galletero-Campos and López-Cepeda, 2018), while the Spanish Ministry of Culture has retained its powers to grant annual subsidies to general-topic magazines. Generally speaking, most of the subsidy-related calls for applications issued by the autonomous communities since the 1980s have been marked by language criteria (Díaz-Noci, 1998), whilst also seeking to strengthen the sector and increase dissemination (Blasco-Gil, 2008). Other objectives have recently been contemplated too, such as fostering reading and increasing specialised journalism (Quintana and Oliva-Marañón, 2012).

Alongside institutional advertising,⁴ media subsidies have become an essential source of financial resources for the media, and a source of controversy with regard to distribution and transparency (Aguado, 2018). Such issues have led the AEEPP to ask political parties to include institutional advertising among the activities contained in the Transparency, Access to Public Information and Good Governance Law. The aim of doing so would be to find out information beyond that contemplated in the annually published *Informe de Publicidad y Comunicación Institucional* (Institutional Advertising and Communication Report). The items in this report are broken down by ministry, priority, objective, target audience, campaign carried out, territorial dissemination, type of medium used for

² Reference has also been made to institutional advertising in the petitions made by the sector. See Cano (2020), Europa Press (2020) and FAPE (2020).

³ Action taken so far includes the government's approval, in April 2020, of a Royal Decree-Law making the reduced VAT rate of 4% applicable to digital books, magazines and periodicals in the same way as it had been to their paper equivalents.

⁴ State institutional advertising in Spain is regulated by Law 29/2005, of 29 December, on institutional advertising and institutional communication. This law coexists alongside the regional laws in the Autonomous Communities of Andalusia, Aragon, the Principality of Asturias, the Canary Islands, Castile and León, Catalonia, the Valencian Community, Navarre, Galicia and Extremadura.

such dissemination, as well as the amount allocated to each type of medium. However, the names of the specific media outlets selected to carry out such dissemination are not given. That also led the AEEPP to create the Institutional Advertising Observatory in 2014, the aim of which is to check whether institutional advertising campaigns are adequately planned.

OBJECTIVES AND METHODOLOGY

The aim of this work was to perform a comparative X-ray of media subsidies promoted by Spain's autonomous communities in 2019. An initial scan detected 12 subsidy-related calls for applications in nine of Spain's 17 autonomous communities: Andalusia, Asturias, the Canary Islands, Catalonia, the Valencian Community, Galicia, Navarre and the Basque Country. While they are the same autonomous communities as those identified in previous research (Blasco-Gil, 2008), there have been substantial variations over the years.

The first part of this article describes the main features of the different calls, with special attention being paid to the following four objectives:

- 1. To identify the institutions issuing subsidy-related calls for applications.
- 2. To detect the profiles of beneficiaries.
- 3. To study the purpose of the subsidies.
- 4. To analyse the subsidy-granting criteria, distinguishing between direct and indirect subsidies, and automatic and selective subsidies.

After summarising the main features of the subsidies in each of the autonomous communities, specific sections are dedicated to each of their cross-cutting aspects, such as the institutional attachment of bodies issuing subsidy-related calls for applications; the sectors that can benefit from the subsidies; the justification for subsidies; and the subsidy-granting mechanisms and the degree of discretionality within them.

RESULTS ANALYSIS

ANDALUSIA

In Andalusia, a marked change was observed in 2018, when subsidies had been focused on media literacy and fostering press reading (Official Gazette of the Government of Andalusia, 2018). In 2019, calls for applications were issued for more selective, non-competitive subsidies aimed at local radio broadcasters (Official Gazette of the Government of Andalusia, 2019). The call-issuing body was the Government of Andalusia's Directorate General for Social Communication, which allocated €230,000 to help finance the operating costs of FM radio broadcasters in municipalities with populations of 5,000 to 15,000 inhabitants.

The subsidies ranged from \leqslant 1,000 to \leqslant 2,200 depending on the number of inhabitants in each municipality. The beneficiaries had to avoid sexist stereotypes and discrimination, and foster values of equality, role plurality and shared responsibility of men and women, as well as equal working conditions. The call rules stipulated that the beneficiaries would be asked to provide information about the gender policies applied. According to estimates, a total of 115 municipalities would have been able to benefit.

PRINCIPALITY OF ASTURIAS

In Asturias, subsidies were aimed at media intending to foster the use of Asturian and Galician-Asturian (Official Gazette of the Government of the Principality of Asturias, 2019b). A total of 28 projects (Official Gazette of the Government of the Principality of Asturias, 2019a) benefited from this competitive call for applications issued by the Directorate General for Language Planning and Standardisation, which reports to the Government of the Principality of Asturias's Ministry of Education and Culture. Among the beneficiaries were press, radio, television and Internet firms. The total amount was €100,000, with the maximum subsidy per project being €20,000 and covering between 65% and 90% of the approved budget.

Among the assessment criteria were the level of project development, thematic cross-cutting approach, alignment to the objectives of the standardisation of Asturian, and the presence of Asturian or Galician-Asturian in the media outlet's content and programmes. The call stipulated that the size of a written, spoken or broadcast space would be taken into account, as would the prominent position on a page or in a broadcast, and the update frequency.

BALEARIC ISLANDS

In the Balearic Islands, there were two subsidy-related calls for applications aimed at different media, though the objective of both was the same: to foster the use of Catalan in the media.

The two 2019 calls were issued by the Directorate General for Language Policy, which reports to the Government of the Balearic Islands' Ministry of Culture, Participation and Sport. The objective of the first one (Official Gazette of the Government of the Balearic Islands, 2019c) was to award direct subsidies to local or specialised-topic publications written in Catalan. The call was competitive and had a budget of $\leq 225,000, \leq 175,000$ of which were set aside for publications of the first type and $\leq 50,000$ for the second. Applicants had to attach data for the previous year, such as those for the workforce, print run, number of pages, periodicity, point of sale and whether or not there was a digital version. Sixteen local-topic and 17 specialised-topic media outlets benefited from the call (Official Gazette of the Government of the Balearic Islands, 2019a).

The second call, also competitive in nature, was aimed at print and digital publications and radio and television broadcasters, including local, island and autonomous-community ones, which disseminated content wholly or partially

in Catalan. The criteria assessed were the workforce's knowledge of Catalan, the media outlet's scope, and the number of hours or length of content in Catalan.

In this second case, a specific criterion of fostering greater use of the Catalan language was observed. The 2019 call (Official Gazette of the Government of the Balearic Islands, 2019d) divided the overall amount allocated to this objective - \in 775,000— among media that had disseminated in Catalan in the previous year; media that had partially used Catalan in their activities and had promised to increase it; and media that had launched their Catalan editions in the previous year. In 2019, there were just two beneficiaries (Official Gazette of the Government of the Balearic Islands, 2019b), the newspaper *Ara Balears*, which received just over \in 148,000, and the digital publication *dBalears.cat*, which obtained some \in 31,600. No radio or television outlets met the requirements, despite the fact that money had been allocated to the corresponding budget item.

CANARY ISLANDS

The geographical setting of the Canary Islands favours the existence of a subsidy modality not detected elsewhere. It is a direct subsidy for transporting local press between the islands. The beneficiaries are paper press outlets with registered offices on one of the islands of the archipelago.

In 2019, the Government of the Canary Islands' Ministry of Economy, Knowledge and Employment issued a call for applications (Official Gazette of the Government of the Canary Islands, 2019), with the objective of the subsidies being to compensate outlets for transport costs between 2016 and 2017. The budget allocated to the call was €300,000. Applications had to include documentation such as invoices for all the items linked to transporting press around the archipelago. Such subsidies could be supplemented by those received from the General State Administration of Spain for transporting goods between the islands, and could even reach 100% of accredited transport costs.

CATALONIA

In Catalonia in 2019, there were language-related direct subsidies for fostering media. Calls for applications were issued⁵ by the Office of the Secretary for Communication, which reports to the Government of Catalonia's Presidential Department (Official Gazette of the Government of Catalonia, 2019b).

Those eligible to apply for these subsidies were local, county, supra-county, autonomous-community or state-wide media that had publications or broadcasts wholly in Catalan or Aranese. On this occasion, publications partially published in these languages were not considered, unlike in previous calls.

⁵ The calls can be found in different issues of the Official Gazette of the Government of Catalonia (2019).

The budget item was far higher than all the others seen in this study. The overall amount for 2019 was nearly ≤ 9 million, of which ≤ 2.3 million were allocated to daily publications, ≤ 1.7 million to non-daily publications, just over ≤ 2 million to digital media, $\leq 700,000$ to radio broadcasters and $\leq 615,000$ to television broadcasters.

Among the criteria for awarding subsidies to print publications were periodicity and a minimum number of copies and pages per year. The subsidy was tied to the number of copies published and the corresponding circulation. For digital publications, the number of employees, number of visits and the average time of each visit were computed.

For radio and television subsidies, a basic amount was granted by taking into account potential audience, which was increased depending on the number of employees, the number of hours of self-produced programmes and the mean audience recorded. In this case, there was generally no need to broadcast wholly in Catalan or Aranese. The requirement to do so was only stipulated for self-produced programmes, and different percentages, by topic, were set for the rest of the programmes.

Lastly, and notably, the same call for applications included a subsidy stream for associations, foundations and professional colleges linked to the communication sphere (Official Gazette of the Government of Catalonia, 2019a). With €1.4 million in 2019, they were not subsidies for the media, but instead for sector-related institutions. Hence, their purpose was not language promotion, but that of fostering journalism and the so-called 'Catalan communication space', which includes Catalan-speaking territories. They could therefore be considered indirect subsidies aimed at improving the media sector in general.

VALENCIAN COMMUNITY

In the Valencian case, calls for applications have been issued for two different subsidy streams since the change in the political leaning of the government in 2015. First, subsidies granted by the Acadèmia Valenciana de la Llengua (Academy of the Valencian Language, AVL), the independent body for language standardisation, and second, subsidies relaunched by the Valencian Government, which were based on those existing in the 1990s. The underlying objective of both calls was the same: to foster the language.

In the first case, subsidies were aimed at local radio broadcasters and local or county-wide specialised magazines and research journals, regardless of whether they wholly or partially used Valencian. The beneficiaries of the 2019 call's €35,000 were nine radio broadcasters (mostly municipal ones), eight research publications and 24 press publications.

Commercial broadcasters had been eligible to submit applications under this call until 2016. In that year, the Valencian Government opened a media subsidy stream and the AVL redefined its subsidies to foster not-for-profit initiatives only, thus complementing those of the Government. Prior to the co-existence of the two streams, the AVL had allocated a budget of up to €60,000 per year to its calls (Blasco-Gil, 2008).

The Valencian Government's last call —a competitive one— was in 2018.⁶ It was issued by the Directorate General for Language Policy and Multilingualism Management, which reports to the Government of the Valencian Community's Ministry of Education, Research, Culture and Sport.

The beneficiaries were all kinds of local, county, Valencian or state-wide print and digital publications. For radio, local and county broadcasters or Valencian delegations of state-wide broadcasters were also taken into account. In the case of television, local, county and autonomous-community channels were considered, but not state-wide ones.

To assess the amounts granted to paper and digital press outlets, the length of the articles in Valencian, periodicity and space devoted to information and advertising in Valencian were taken into account. For radio and television broadcasters, the total number of hours of programmes in Valencian was taken into account, as was the part devoted to informational, cultural and music programmes in Valencian.

In 2018 (Official Gazette of the Valencian Community, 2018a), there was an allocated budget of \leqslant 600,000 for radio broadcasters, \leqslant 400,000 for television broadcasters and \leqslant 900,000 for paper and digital press outlets. However, in the final decision (Official Gazette of the Valencian Community, 2018b), only \leqslant 1,800,000 were granted because, while there were awardees in the paper and digital press categories, there were none in the radio and television ones.

GALICIA

In Galicia in 2019, non-competitive calls for applications were issued for subsidies relating to production and distribution costs (Official Gazette of the Government of Galicia, 2019). They were aimed at paper press firms, radio broadcasting firms, and journalistic firms publishing on the Internet. Expressly excluded were television firms, private radio firms broadcasting solely on the Internet, and freesheets.

The call-issuing body was the Government of Galicia's Office of the Vice President and Ministry of the Presidency, Public Administrations and Justice, and the objective was to strengthen media that defended Galicia's identity, interests, language and culture.

The amounts varied depending on the profiles of the applicant bodies. The amount was \leqslant 1,255,000 for journalistic firms publishing on paper, \leqslant 266,400 for private radio broadcasting firms, and \leqslant 455,377 for journalistic firms publishing on the Internet.

⁶ In 2019, the Ministry announced that it would not issue any new calls until it had analysed whether the 2018 subsidies had been correctly granted, with the necessary evidence being provided by the beneficiaries. The 2020 call was postponed and, as of April 2020, had not been reinstated (Levante, 2019).

Among the conditions was the need for the applicant bodies to be included in the audits undertaken by the Estudio General de Medios (EGM, General Media Study) and the Oficina de Justificación de la Difusión (OJD, Circulation Audit Office) referring to the calendar year prior to the call. For radio broadcasters, it was necessary to provide a service in Galicia, whereas for Internet firms, it was compulsory to disseminate information daily. In addition, they had to provide evidence of having a workforce of at least five employees, and of creating and disseminating all or some information in the autonomous community. Applicant bodies were also required to use Galician in at least 10% of all information in the press, and in at least 50% of radio broadcasts with an equitable distribution by time slot.

Regarding the assessment criteria, different percentages were established when it came to scoring: dissemination (74%), use of Galician (24%) and language standardisation (2%).

NAVARRE

In 2019, Navarre had two different subsidy streams for activities connected with the media in its territory.

The first one was called by the Directorate General of Communication and Institutional Relations, which reports to the Government of Navarre's Ministry of the Presidency. Its aim was to grant direct subsidies to not-for-profit bodies undertaking generalist communication activities via the creation of new online media, or the improvement of existing ones, as a mechanism for fostering citizen participation and strengthening the assurance of pluralism. The call for these subsidies (Official Gazette of the Government of Navarre, 2019b) did not receive any applications (Government of Navarre, 2019), so nobody benefited from the €87,500 that had been set aside.

In the case of Navarre, however, there is another type of subsidy, whose calls for applications are issued by the Navarre Institute of the Basque Language, an autonomous body for the promotion of Basque within the autonomous community, which is attached to the Government of Navarre via the Department of Citizen Relations.

It is therefore not surprising to find that the purpose of the subsidies for which this body issues calls for applications is the promotion of the presence of the Basque language in the media (Official Gazette of the Government of Navarre, 2019a). They are competitive, language-related direct subsidies for paper press outlets, radio broadcasters and online media. They consider subsidies for media that wholly or partially use Basque. In order to be eligible to apply for these subsidies, applicants need to submit projects detailing the language contribution they would make. And, for the subsidies to be awarded, aspects such as the number of pages and broadcast hours in Basque are taken into account. The procedure is not automatic, however, as applications are assessed by a committee.

In 2019, the amount allocated to these subsidies was \leq 680,000 and there were 24 beneficiaries.

BASQUE COUNTRY

In the Basque Country in 2019, subsidies were managed by the Government of the Basque Country's Department of Culture and Language Policy and were aimed at increasing the presence of the Basque language in the media (Official Gazette of the Basque Country, 2019). Albeit with slight differences, they followed the same lines as those in previous years. In 2018, subsidies were aimed exclusively at newspapers and news agencies (Official Gazette of the Basque Country, 2018). In 2019, national publications, local radio and television broadcasters, and exclusively digital media in the Basque language benefited from these subsidies, which have a budget for the 2019-2021 period of \in 12,165,900, of which \in 5,550,000 are for national publications, \in 1,050,000 for local radio broadcasters, \in 4,215,900 for local television broadcasters, and \in 1,350,000 for digital media in Basque.

In the case of publications, the only ones able to benefit were national ones in Basque that dealt with topics that were more profound than everyday ones (general information magazines and specialised magazines on thought, science, music, nature, chidren's and youth issues, etc.) and were distributed throughout the Basque Country. For radio and television broadcasters and digital media, it was also compulsory to broadcast or disseminate in Basque.

Among the requirements, publications had to be attached to the OJD or be able to provide evidence of the number of copies, of a transparent distribution system, and of a minimum periodicity and number of pages. For digital media, a journalistic style and periodical update were demanded, as was evidence of the number of visits using Google Analytics.

For radio and television broadcasters, broadcasts had to be live and aired year round, with at least 25 hours per week for local radio broadcasters and 10 per week for local television broadcasters, without computing repeats, wholly musical programmes, simulcasts or delayed broadcasts of third-party programmes.

Institutions Responsible for Issuing Subsidy-Related Calls for Applications

In this first section of cross-cutting analysis of the different subsidy-related calls for applications, the types of institution or body responsible for the subsidy streams are examined.

Firstly, it was found that, in the majority of cases, subsidies were awarded by the government of each autonomous community, albeit with some slight differences. Up to five autonomous communities issued subsidy-related calls for applications via their directorates general. These reported to ministries of the presidency of a markedly political, non-sectoral nature, and had an almost direct organisational dependence on the presidency of the autonomous community. That was the case for Andalusia, Catalonia, Galicia and one of Navarre's subsidy streams.

Secondly, of note are those autonomous communities that made media subsidies available via their ministries of culture: Asturias, the Balearic Islands, the Valencian Community and the Basque Country. Common to all of them is the

fact that subsidies were linked to the promotion of each autonomous community's own language, i.e., they formed part of calls for applications that depended on language policy bodies and were presented as cultural policy.

In this language-related field, of note is a second subsidy stream found in the Valencian Community and Navarre. In the first case, the AVL, the Valencian Community's language standardisation body, issued calls for applications and made a final decision to award subsidies to non-commercial specialised magazines and local media outlets. Even though the AVL's available budget was much smaller than the one allocated to the call for applications issued directly by the Government of the Valencian Community, it stands out because it was the only call for applications issued by an autonomous-community institution that did not report to the Government. In the case of Navarre, it was the Navarre Institute of the Basque Language that issued calls for applications relating to the main subsidy stream. Again, it is an organisation linked to language policy, but the fact that is an autonomous body means that it is attached to the Department of Citizen Relations and that its director is appointed by the Government of Navarre.

Lastly, worthy of attention are the subsidies in the Canary Islands. Given the fact that they were approached from the perspective of being a mechanism to compensate for the cost of transporting goods between the islands, calls for applications were issued by the Government of the Canary Islands' Ministry of Economy, a formula not found in any other autonomous community studied.

THE MAIN SECTORS BENEFITING FROM SUBSIDIES

The beneficiaries of subsidies, for which nine of the autonomous communities analysed issued calls for applications, had different profiles depending on the purpose of the subsidies and the requirements demanded. This was due to the fact that some calls for applications focused on one type of medium and specific support, whereas others selected beneficiaries according to geographical or language-related criteria.

It was found that, in autonomous communities such as Catalonia, the Valencian Community, the Basque Country, Asturias, Galicia, the Balearic Islands and Navarre, the determining and differential requirement for being eligible to apply for subsidies was language, although the degree of exigency of that criterion varied in the calls for applications. In some cases, full dissemination in an autonomous community's own language was demanded; this was the case for the Catalan model and some of the subsidy streams in the Basque Country and the Balearic Islands. In other cases, the presence of an autonomous community's own language was valued despite it not being the only one used; this was the case for Asturias and Galicia, for both calls for applications in the Valencian Community, for one of the calls in Navarre and for some of the calls in the Basque Country.

It is striking that six of the nine autonomous communities had abandoned the concept of press subsidies in favour of offering media subsidies, which meant that the beneficiaries were not only press publications, but also digital publications and radio and television broadcasters. This was the case for Asturias, Catalonia, the Basque Country and one of the subsidy streams in the Balearic Islands,

the Valencian Community and Navarre. Thus, in comparison to previous studies (Blasco-Gil, 2008), an increase in the number of autonomous communities extending subsidies to sectors beyond the press was observed.

However, another three autonomous communities offered sectoral and restricted subsidies. This was the case for Andalusia, whose subsidies were focused on local radio broadcasters; the Canary Islands, which only took into account print publications; and Galicia, whose subsidies were aimed at press outlets and radio broadcasters, leaving television broadcasters out.

Thirdly, among the requirements was proximity. Many autonomous communities underscored this component in their descriptions of potential applicants. In some cases it was exclusive, as was the case in Andalusia, where applicants could only be local radio broadcasters, and in the Canary Islands, where they could only be the archipelago's press outlets. And in other cases, the proximity component was simply inclusive, as was the case in the majority of the autonomous communities analysed.

Fourthly, another specificity was specialised topic. Publications meeting this criterion could submit applications under calls in the Balearic Islands, the Valencian Community and the Basque Country.

Lastly, of note are two calls for applications that did not have the media as such among their beneficiaries. Instead, they had bodies that could promote journalism and pluralism. This occurred in the subsidy-related calls for applications issued by Navarre, the beneficiaries of which would be not-for-profit bodies creating new online publications, and in one of the calls in Catalonia, whose subsidies were aimed at associations, foundations and professional colleges.

Purpose and Justification of Subsidies

The third section of cross-cutting analysis focuses attention on the objectives pursued by the subsidies. It was found that the predominant subsidy-related calls for applications had as their purpose the fostering of own languages, by means of developing and consolidating media that promoted content using those languages. This was the case for Asturias, the Balearic Islands, Catalonia, the Basque Country, the Valencian Community and Navarre. In Galicia, this was actually taken one step further, favouring media that defended not only the Galician language, but also Galician identity, interests and culture.

The rationale behind the language purpose derives from the respective statutes of autonomy and ensuing language standardisation laws or policies, in which the importance of initiatives linked to promoting the presence of an own language in the communication sphere is recorded. However, the different changes in political colour of the autonomous community's governments can lead to the presence or absence of this justification for their subsidies. This is the case, for example, of the Valencian Community and the Balearic Islands, where language-related subsidies have been made available or cancelled depending on the party in power at any given time (Blasco-Gil, 2008).

Besides this justification, there is a recurring concern to foster local communication. Falling within this area are the subsidy-related calls for applications issued

by the Canary Islands, in which the purpose was to compensate for the cost of transporting local press between the islands, it being understood that such press contributes to cohesion by enabling the Islands' population to have daily and occasional access to all information regardless of the publishers' island location or the territorial scope of the information. Also within this area are the Andalusian subsidies for local radio broadcasters, the purpose of which was to ensure the quality and continuity of the service and to create jobs. However, beyond these specific subsidies, many autonomous communities clearly stipulated local media as being among their beneficiaries. It was, therefore, a shared concern.

Lastly, two subsidy-related calls for applications are again worthy of note—those of Navarre and Catalonia— because the justification for them falls outside the usual criteria. In Navarre in 2019, a call for applications was issued for a subsidy aimed at not-for-profit bodies that would launch new communication initiatives with the rationale of fostering citizen participation, and thus strengthening pluralism. In Catalonia, meanwhile, of note are subsidies offered to associations, foundations and professional colleges, the justification for which was fostering journalism. In both cases, the benefit was not focused on the media, but instead on the media system as a whole. Thus, the call-issuing authorities demonstrated their interest in enriching the diversity and quality of the communication offering.

SUBSIDY-GRANTING CRITERIA AND MARGIN OF DISCRETIONALITY IN AWARDING SUBSIDIES

The last cross-cutting issue analysed is subsidy types, depending on whether or not they directly benefited the media, and on what criteria and/or discretionality were/was applied to award them.

Of note is the lack of indirect subsidies, i.e., those that contribute to the progress of the sector as a whole and are not awarded to any particular media outlet. Within this type, we included Catalonia's subsidy stream for associations, foundations and professional colleges linked to communication. This call had a budget of $\leqslant 1.4$ million in 2019, a sum that surpassed many of the amounts that the autonomous communities had allocated to all subsidies.

The rest of the subsidies described in the study were direct ones and the beneficiaries were mostly private media outlets. However, in Navarre, there was a subsidy-related call for applications aimed at not-for-profit bodies (which did not receive any applications) and, in Valencia, the AVL's call for applications aimed at non-commercial media stood out.

Furthermore, the vast majority of media subsidy calls issued by the autonomous communities in 2019 had the common feature of being selective, i.e., the applications received by the call-issuing body could be subjectively assessed. All the calls for applications stipulated the subsidy eligibility requirements, which usually demanded a minimum circulation or number of broadcast hours, as well as other commitments, which were language-related in many cases. The computation of all the criteria usually provided the applicant with a score, but it was a final assessment committee that distributed the amounts among the awardees. A

margin of discretionality for the authorities was introduced, a fact that had the potential to make the transparency of subsidy execution somewhat nuanced.

Against this backdrop, the cases of the Canary Islands and Catalonia stood out because both autonomous communities had automatic subsidies. In the case of the former, the amount subsidised was derived from the cost of transporting press between the islands, so the amount the publishers received depended on the costs that had to be met. In Catalonia, the subsidies also had objective criteria in order to determine the amount an awardee would receive. These took into account circulation, audience, periodicity and scope. However, something that should be noted is Catalonia's intention, announced in early 2020 (Generalitat de Catalunya, 2020), to open a new stream of subsidies "for projects", i.e., selective ones with the potential for the authority to exercise discretion, like those described previously in the majority of autonomous communities, and like those that this autonomous community had already offered for many years (Blasco-Gil, 2008; Galletero-Campos and López-Cepeda, 2018).

To monitor the subsidies granted, as set out in the calls for applications and the final award decisions, the need to check the correct application of subsidies via an accountability system was considered, and justification of project execution and all costs was made compulsory. Indeed, the subsidy-granting bodies had the ability to check the correct application of subsidies by demanding invoices and documents. In the Basque Country, the creation of a monitoring committee was also considered.

CONCLUSIONS

After carrying out the analysis, the main features of media subsidies detected in nine of Spain's 17 autonomous communities in 2019 were set out in detail. Prospectively, these elements may be useful for establishing a subsidy system operated by the General State Administration of Spain, as demanded by the sector in spring 2020.

In the autonomous communities, clear profiles of the call-issuing bodies were observed. A significant number of the subsidy streams depended on directorates general of communication that reported to ministries of the presidency —the regional equivalents of Spain's Office of the Secretary of State for Communication— thus giving them a markedly political character. A representative number of them originated from ministries of culture with language policy powers. Only one autonomous community had subsidies for which calls for applications were issued by public bodies not controlled by the respective government.

The concept of press subsidies had been replaced by that of media subsidies. In fact, the radio broadcasting sector was found to have benefited the most, since it appeared in two thirds of the subsidy-related calls for applications. Next came the paper press, which appeared in half of the calls. Television was the least favoured medium, since it was only considered in one third of the calls. Meanwhile, digital media had gained ground.

The profile of the beneficiaries was determined by the purpose of the subsidies, the requirements that had to be met, and the assessment criteria. Thus, many were media outlets established in, or offering specific services in, the call-issuing autonomous community. This was due to the fact that most of the subsidies were either language related or aimed at local or county-wide media outlets. In fact, be it by geography or topic, a concern for local and specialised communication was observed.

Most subsidies —with the exception of Andalusia, the Canary Islands and one call for applications in Navarre— were aimed at fostering own languages. The justification for subsidies was, therefore, that of complying with the respective statutes of autonomy, regional laws or language standardisation laws. The Andalusian and Canary Islands' cases were characterised by a different approach, which was focused on promoting media that were local and very selective in terms of profile. Fostering media pluralism and journalism practice are also noteworthy as the main objectives of the two subsidies not directly aimed at the media in Navarre and Catalonia.

Lastly, the lack of indirect subsidies was striking. Indeed, a predominance of direct subsidies was observed, the beneficiaries of which were mostly private media outlets. In this case, most subsidies were of a selective nature, which meant that the call-issuing bodies had a higher degree of discretionality. Indeed, there were very few automatic subsidies awarded on the basis of more subjective criteria.

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