



Towards a better social contract with big tech



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New technologies, new responsibilities

New technologies have always been changing the world and brought about amazing advantages and opportunities. The Internet, automation and the digital revolution we are in the midst of are no exceptions.

This progress has become an indispensable part of everyday life for many Danish families and for the business community. Whether at our workplace or when communicating with friends and family, shopping, or finding entertainment, these new technologies make various aspects of our life easier. While also contributing to innovation, growth and job creation in Denmark.

During the pandemic, we have seen the benefits of the high degree of digitalisation in Denmark. Our strong digital infrastructure and skills have contributed to Denmark managing the crisis well.

But with progress comes new challenges. Big tech companies have become world-dominant based on a new economy – the platform economy, which is built on data-driven, algorithmic business models. An economy in which corporate business models increasingly dictate our time and manage our data, without regulations keeping pace.

This poses challenges to our democracy and national interests. Challenges within the areas of health, law, media, democratic debate and participation, the labour market, taxation and competition and consumer protection that need to be addressed. These have remained unattended for too long. We have seen problems grow bigger because we have more or less

accepted that these problems are the price of progress. That the state of affairs could not be changed, and that the actions of big tech were inevitable.

But this does not have to be the case. We should insist on setting limits. It does not have to be big tech's data-driven business models that dictate so much of social development, as is the case today. It must be our societal values providing the frameworks. We must take advantage of free market innovations, but big tech and the emerging platform economy should be regulated, which has traditionally been done when new types of companies and economies have emerged.

The development of big tech is one of the megatrends that we need to find a way to deal with as a society. Big tech needs to be regulated in the public interest – just like everyone else on the market.

That requires debating the challenges inherent with big tech, as well as pausing to consider where it is we want to go. This is the motivation behind this White Paper.

It sets out nine principles for a more responsible and just society with big tech, each dealing with an area in which we perceive a significant challenge to our society. The principles and the White Paper are not exhaustive, but should be seen as a first step towards a common direction for Denmark and the international community. A common direction where technology, accountability and social responsibility go together.



Box 1

Big tech

'Big tech' is a dynamic term for technology companies that have gained a large social impact and market-dominating position through the proliferation of their platforms and services. These are companies that base their business model on collecting huge amounts of data for later use and dissemination. Companies such as Facebook and Amazon are good examples.

Proposal for debate and nine principles for a more responsible and fair society with big tech

The Danish government wants to implement regulation addressing the business model of big tech and the platform economy this decade, to ensure that digitalisation interacts in the most positive way with our democracy, our economy and our culture.

However, this poses a series of significant problems. Five issues in particular are central to the debate:

- How do we strengthen democratic control while preserving the benefits of technological development and innovation?
- How do we connect the strong learning and teaching potentials of technology with a safe and healthy childhood and youth without dissatisfaction?
- How do we ensure an orderly, nuanced public debate, get rid of illegal content and at the same time respect freedom of expression?
- How do we set the framework for big tech's business models to benefit the public and all of society?
- How do we ensure that big tech contributes to our welfare society with fair tax payments, promotion of Danish culture, fair competition and proper working and consumer conditions?

The Danish government does not have the answer to all the problems nationally, in the EU or globally. But there is no doubt about where we want to go. The government has therefore set out nine principles for what we want to see in our society, and what role we wish for big tech within it. The nine principles will contribute to a more responsible and fair society with big tech.

Much must be resolved jointly in Europe and in cooperation with like-minded countries, not least the United States. But a new and stronger approach is also needed nationally for its own sake, as well as to inform common European and international solutions.

We believe strongly in direct dialogue with the tech industry, which has called for clearer regulation in several areas – and we invite companies to participate in the discussion on how we ensure democratic control of the rapid technology development. Mark Zuckerberg, the founder of Facebook, is quoted as saying: *"Major regulation of large internet platforms is needed to help them balance the dilemmas of privacy, competition, free speech and safety".*¹

We must ensure greater visibility, also in the national debate, about the solutions we believe are necessary if we are to ensure a social contract with big tech along the lines of the 9 principles.

We want a society in which



1. the business models of big tech must be subject to democratic frameworks



2. children and young people must have a safe childhood with a healthy balance between the digital world and the physical world



3. big tech must support democratic debate – rather than undermine it through digital echo chambers and polarisation



4. big tech must take greater responsibility for the content on its platforms



5. free, well-functioning media must support democratic debate, in which everyone receives fair payment for their creative work



6. workers' rights must be protected – including on digital platforms



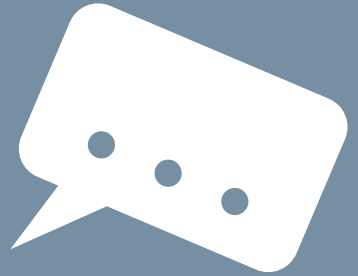
7. big tech must contribute to the financing of the welfare society in line with all other companies



8. competition must be fair and transparent, and consumers must be able to shop safely online



9. democratic governments must set the framework for big tech – not the other way around



The growing influence of big tech

Big tech companies continue to grow bigger and take up more space in our society and everyday life. This is partly due to the fact that they offer many products and services that make our lives easier. Services that many users rely on, as evidenced by the number of users on their platforms and their rapid economic growth. Their amount of users and tremendous financial capabilities give them large influence in both a Danish and global perspective. That growth has also challenged

traditional legislation, and meant that big tech operates outside the framework of regulation in several areas, as the regulations we have that cover big tech are outdated or inadequate in many areas.

Big tech has undergone rapid development and growth in the last decade, with Amazon in particular multiplying its turnover, cf. Figure 1.²

The many rankings of the world's most valuable companies show the increasing dominance by big tech from the year 2000 onwards, cf. Figure 2.³



Figure 1

The annual turnover of big tech companies 2010-2020

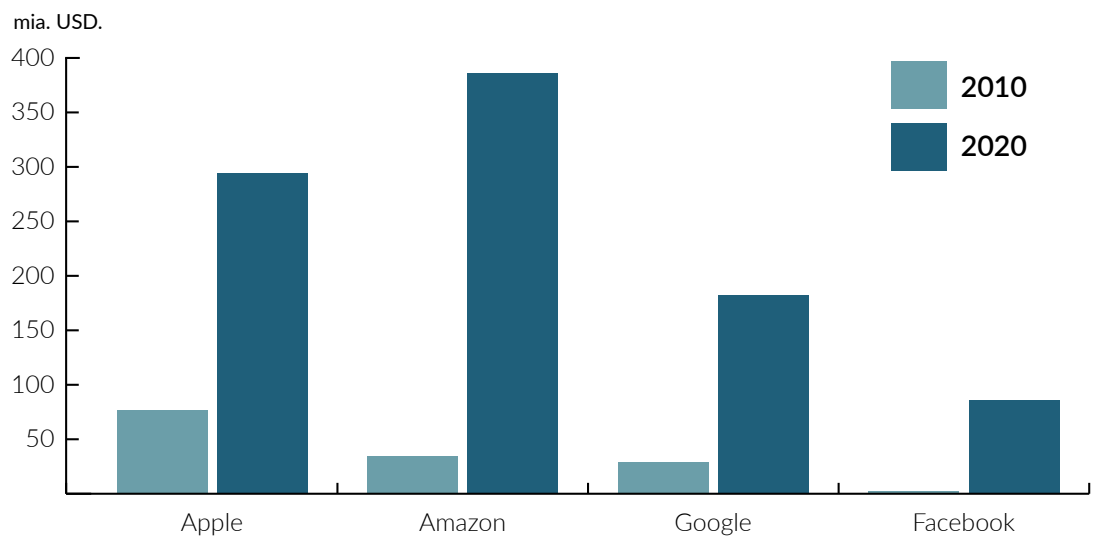


Figure 2

Table of the five most valuable Fortune 500 companies in 2000, 2010 and 2020

	2000	2010	2020
1	MICROSOFT	EXXONMOBIL	MICROSOFT
2	CISCO SYSTEMS	MICROSOFT	APPLE
3	GENERAL ELECTRIC	APPLE	AMAZON
4	INTEL	WAL-MART STORES	GOOGLE
5	EXXONMOBIL	BERKSHIRE HATHAWAY	FACEBOOK

And in a recent top 10 of the world's most valuable companies in 2021, large platforms such as American Amazon, Facebook and increasingly also Chinese platforms and companies such as Alibaba figure prominently.⁴

Danish citizens, like the rest of the world, embrace big tech, including social media. This is seen by the fact that three out of four Danish citizens⁵ have a profile on Facebook, our most widely used social media. Of those profiles, 64% use Facebook daily or several times daily.⁶ Globally, the number of daily



90%

of all internet searches in the EU are done via Google

users has been steadily increasing since 2011, when there were 483 million users. Today there are 1.8 billion daily users of Facebook, cf. Figure 3.⁷

Facebook Inc. owns not only the service Facebook, but also other apps, sites and tools, including social services such as Instagram and messaging services like Messenger and WhatsApp. Facebook is experiencing sustained growth, including during the Covid-19 pandemic, with further growth across their services.⁸

The most popular search engine used in Denmark, Google, has also achieved dominance globally. The European Commission has in previous studies stated that 90% of all internet searches in the EU are done via Google⁹, and Alphabet/Google has been fined DKK 32 billion by the EU's Danish competition commissioner Margrethe Vestager¹⁰ for having abused its power over the Android mobile software. Alphabet,

like other tech giants, continues to grow, and their global brand value has gone from nearly DKK 700 billion in 2010 to almost DKK 2,000 billion in 2020.¹¹

Big tech are significant international players with massive global economic value.¹²⁺¹³ Their influence extends beyond their growth curve, as almost a quarter of the world's population has a Facebook profile, and the majority of internet searches are via Google. This is especially true in Denmark, which is one of the world's most digitised societies, and where the use of smartphones is part of nine out of ten families, cf. figure 4.¹⁴

Social media, e-commerce platforms, search engines and other services from big tech puts them in a special position, from which they influence a large part of the world's population. They are helping to change the way people all over communicate and live.



Figure 3

Growth in the number of daily Facebook users

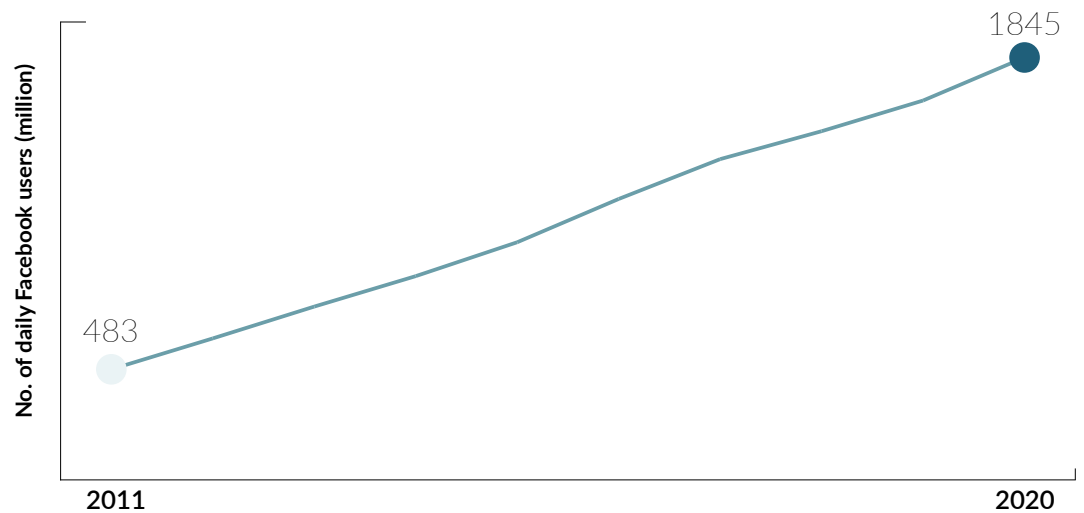
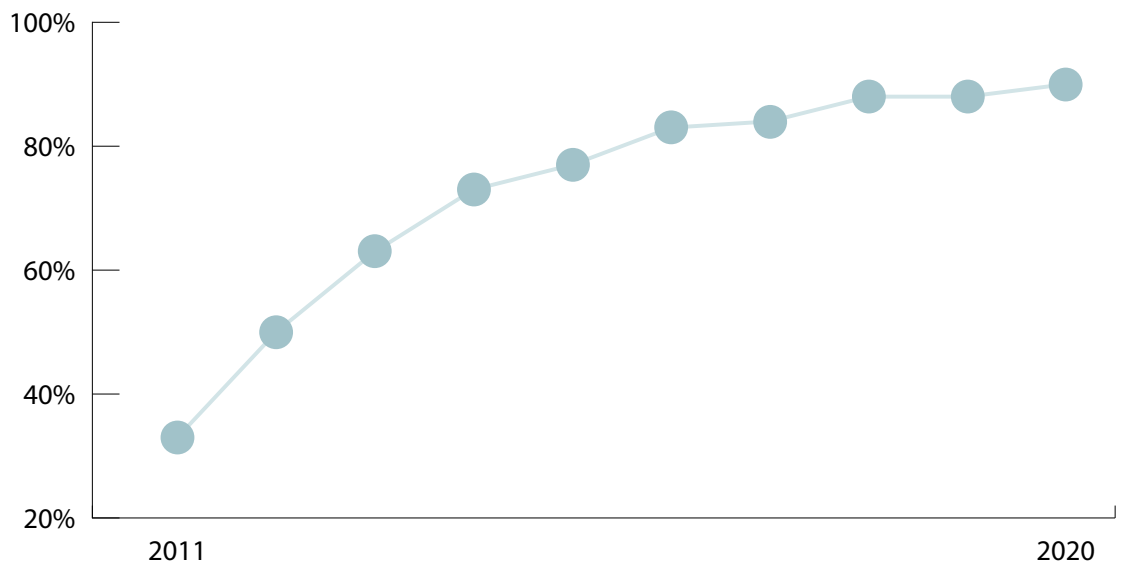


Figure 4

No. of smartphones and mobile phones in the family





The business models of big tech must be subject to democratic frameworks

The digital platform economy relies heavily on business models based on data harvesting and opaque algorithms. As much information and data about its users as possible is collected, used and disseminated, without those users necessarily being aware of it.

Big tech collects large amounts of data about their users, because in several cases their business models are based on collecting as much information about us as possible. Through third-party cookies and login functionalities, they also collect information about our behaviour outside their platform. Even if we are not users of the platform we can be mapped through a shadow profile, using advanced technology and algorithms. This makes it difficult for the vast majority of users to see what personal data they willingly or unwillingly share with others.¹⁶

This knowledge about users is re-sold by some big tech companies to affiliates and advertisers who

can tailor advertisements, banners and other things to each of us that affect our attitudes, behaviour, buying patterns and so on without our knowledge and control. The information is also often used to create profiles of each individual user about everything from our age, gender and nationality to political beliefs, sexual orientation, etc.¹⁷

The amount of data collected is so extensive that big tech can influence their users to make certain choices.¹⁸ This is not only true when it comes to influencing our consumer behaviour with targeted ads that match our searches, but also true concerning our political views and the basis of our democratic debate.¹⁹



Box 2

Cambridge Analytica

In breach of Facebook's guidelines, the consulting firm Cambridge Analytica used data from more than 50 million Facebook profiles to target ads to social media users. The data collected was used to target political messages in connection with the US election campaign in 2016.²⁰



64%

of all approaches to extremist groups go via algorithm-driven recommendations.

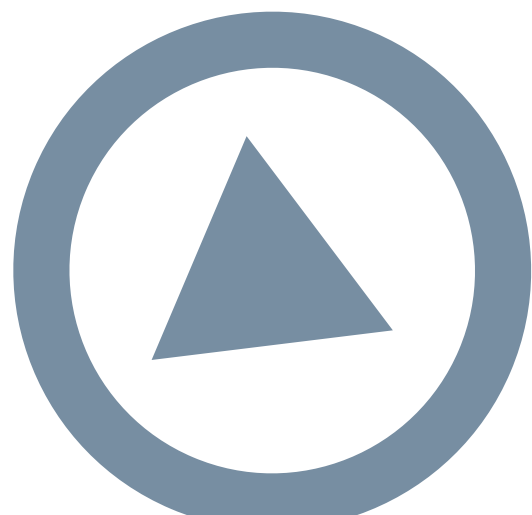
It can allow big tech to influence our opinions and affect rights such as freedom of expression and privacy, while big tech in several areas operates in a regulatory vacuum. To a much greater extent than in the past, we are thus allowing corporations to influence the reach of our open society.

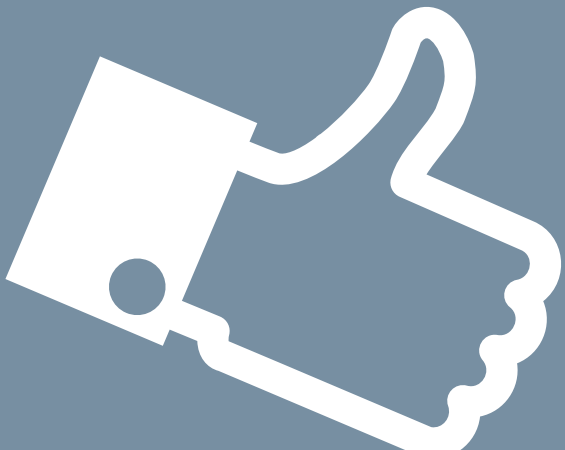
Through their size, business models, and accumulated data and knowledge, certain big tech companies are now close to indispensable to the public, businesses, and ordinary activities of society.

Danish companies, like others in society, experience a number of challenges, and have had some negative experiences on digital platforms.²¹ Among other things, they have found that they often cannot control the conditions under which they are present on a platform.²² The status of global monopolies may thus in some cases weaken competition and consumer conditions and impair the protection of users' data.

With the use of supercomputers, artificial intelligence and behavioural psychology, big tech has developed an effective business in retaining users' attention. One consequence of this is that users are exposed to content that risks leading them into echo chambers and extremist content. An internal memo from Facebook has estimated that 64% of all approaches to extremist groups go via algorithm-driven recommendations.²³

Data volumes and algorithms thus give the platforms massive influence over what content we are presented with online – without giving us the means to relate to how they manage all that data. Neither the ordinary user nor the authorities now know what underlies the fact that some content is profiled above others, or how big tech identifies risks associated with the deliberate manipulation of their services, such as dissemination of misleading information during Covid-19.







Children and young people must have a safe childhood with a healthy balance between the digital world and the physical world

Children and young people's consumption of social media and presence on digital platforms affects their well-being. The digital reality and the algorithms of the platforms may contribute to stress, insecurity, unhealthy physical pressure, anxiety and bullying.



97%

of 9th grade school students are on Snapchat, with 93% of 6th graders

Children and young people interacting with technology is nothing new. With the first home consoles in the 1980s, friends could visit and play games. Later, players could compete and create communities through online games and chat forums. But exposure and technology have evolved, and are expanding with increasing rapidity. The use of digital technologies by young people has thus gone from being pure entertainment and play as part of everyday life, to being whole generations whose lives unfold in front of and on screens.

Everything from homework to friends and shopping is performed on tablets, mobiles, computers, etc. Development is accelerating, and the new generations are now digital natives. There are plenty of benefits to this, but we still do not know the full consequences of digital technologies being present in greater and greater parts of our lives.

The youngest generations are digital from an early age, and the interaction of children and young people is increasingly taking place in digital communities on social media. For example, 97% of 9th grade school students are on Snapchat, with 93% of 6th graders. The most intensive consumption occurs among the 15-19 year-olds, who use social media to a greater extent than the other age groups during school hours and at night.²⁴

Social media provide new opportunities for interaction, but may also have negative effects on the well-being of children and young people. They are at risk of being exposed to inappropriate or offensive content, bullying and misleading as well as false information. And this often happens without them realising it, without adults being aware of it or having the opportunity to intervene. Digital platforms and social media are also the setting for many

children and young people to stage and tell stories about their own lives, which often happens through the sharing of manipulated images.

In many places, this leads to a culture of perfection among children and young people, which can push and stress them. But they cannot just 'log off', as it often means opting out of the community. One study shows that over time (2009-2017) there is a small but statistically significant correlation between having a high screen consumption and severe dissatisfaction.²⁵ The same study indicates that young people who thrive have a lower screen consumption, but chat more often with friends than those who are doing worst.

We must therefore help children and young people find the balance between the digital world and physical reality.

Social media platforms can target content and hold the attention of children and young people and strengthen their fear of missing out, or being left outside the community. Social media such as Snapchat have built-in addictive features, such as 'snapstreaks', which reward users for being active

and interacting with each other. This can lead to a number of problems.

One study shows that especially among girls aged 15-19 years, there are problems with stress, bullying and Fear Of Missing Out ('FOMO'). For example, 19% of girls and 9% of boys find it stressful to keep up on social media. Girls are more concerned with getting likes, and there are social norms concerning always being 'online' and answering messages, snaps, etc. quickly.²⁶

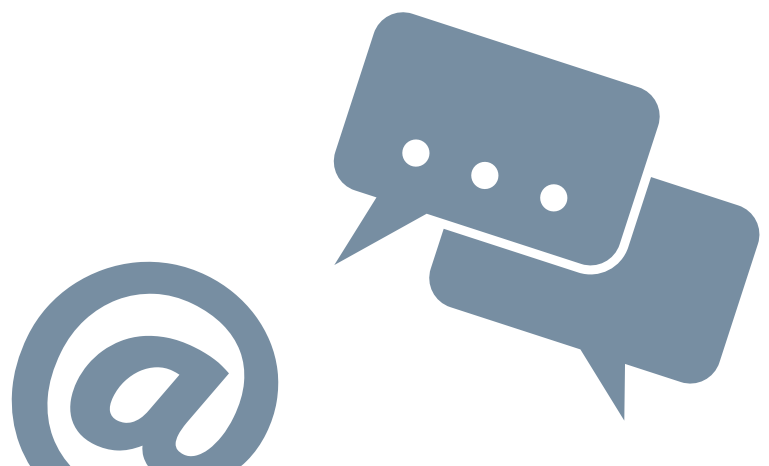
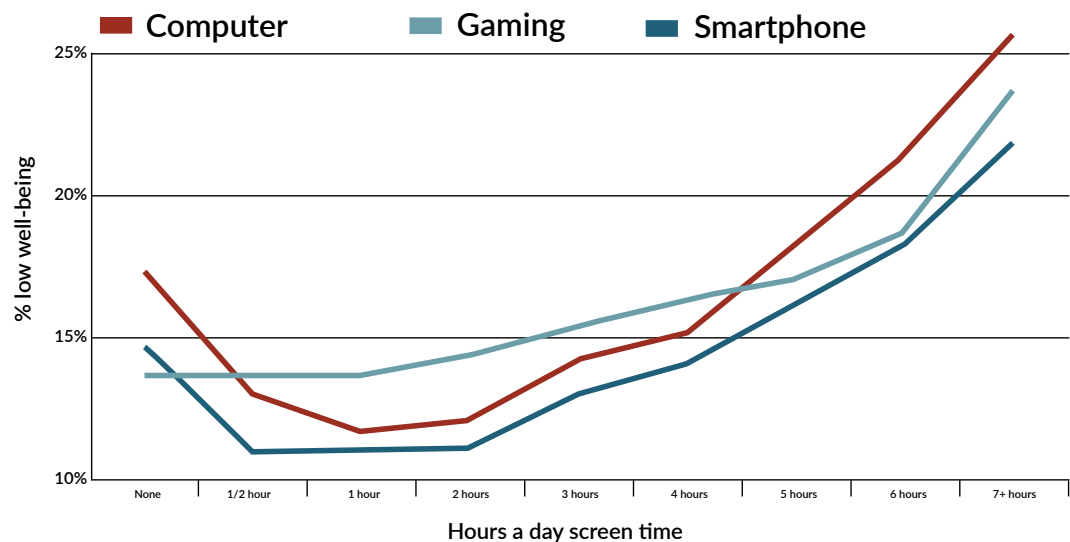
The fear of missing out can keep children and young people up at night in seeking to keep up and be present, which means poorer sleep that can affect well-being. This is clearly illustrated by the fact that young people's consumption of digital media and screen time affects their mental well-being, which decreases in line with their consumption, cf. Figure 5.²⁷

Dependence on digital media and the amount of time spent on digital media also increases the risk of children and adolescents feeling stressed or experiencing stress symptoms such as elevated cortisol levels, palpitations or difficulty concentrating.²⁸



Figure 5

Relationship between consumption of digital media/ screen time and mental well-being







Big tech must support the democratic debate online – rather than undermine it through digital echo chambers and polarisation

Digital technologies and social media platforms connect us as never before, and create new opportunities to express an opinion. But social media algorithms threaten democratic discussion, and create echo chambers online in which the opinions of users are simply reinforced.

▼
3,3
mio.

of the posts on Facebook in Denmark between 2019 and 2021 were either hateful or offensive

With their platforms, the big tech companies have created a global forum for exchanging opinions, where everyone can have a say without first having to pass an editorial filter. They can therefore promote democracy and public debate. They enable anyone equipped with a computer or smartphone to express themselves widely. They have furthermore become an important tool for organising civic groups and movements, no matter where you live or who you are.

Although Danish citizens use several social media platforms, including LinkedIn, Instagram, Snapchat, YouTube, Pinterest, WhatsApp and Twitter²⁹, the preferred digital forum for watching and exchanging news is Facebook with its 3.5-4 million Danish users.

For many Danish citizens, social media platforms are important forums for news and political debate. For many young people, social media are their primary news medium.³⁰ But unlike traditional media, the core of social media is not news criteria, but data-driven algorithms whose basic design is to create more user satisfaction and increase engagement.

Social media users are therefore typically exposed to content that is reminiscent of what they have previously interacted with. Content that evokes emotions and therefore gets reactions and comments is given higher priority on the platform. This embedded logic in the algorithms can help to create echo chambers, where users are not presented with the views of others, but only the ones that confirm their own attitudes. This threatens parts of the free, open and democratic debate and can contribute to polarisation in society.

We have already seen the negative effect of echo chambers, especially in American politics over the past years, where conspiracy theories and false information abound in digital subcultures. Conspiracies such as QAnon and misinformation about Covid-19 have contributed to an extreme polarisation of society. We see indications of the same dynamics here in Scandinavia.

Even after the content moderation that takes place on social media, debate is often hateful or offensive. According to a new report from Analyse & Tal, more than 5% – corresponding to 3.3 million of the posts on Facebook in Denmark between 2019 and 2021 were either hateful or offensive. In particular, comments on ethnic minorities, gender and equality, as well as political and ideological debates, are of a hateful and offensive nature.³¹

In another study, it appears that 85% declare they "completely" or "predominantly" agree that it is a challenge to freedom of expression for individuals to refrain from participating in the debate on digital platforms.³³

It is also a democratic and social problem when hateful and condescending content is allowed to flourish on digital platforms. In extreme cases, it may become a security issue. As described earlier, almost 2/3rds of all access to extremist groups on Facebook happens through algorithm-driven recommendations. Facebook Inc has known about this since 2016, but has not yet completely solved the problem satisfactorily.³⁴

Big tech has a responsibility. They control the platforms on which public debate unfolds and the algorithms that help to influence our understanding of reality. Social media has a major impact on our democratic conversation and exchange of views, but is subject to only limited democratic control.



Box 3

Democratic debate

The Freedom of Expression Commission's population survey from 2019³² concluded that four out of ten Danish citizens have refrained from speaking out on social media within the past six months, even though they really wanted to. That figure is halved for politicians around the country.





Big tech must take greater responsibility for the content on their platforms

A number of examples of illegal content such as revenge porn and terrorism are found on social media and is not removed quickly enough. Simultaneously, there can also be a perception that social media removes too much legal content. Further, it has become easier to sell illegal products through online platforms.

Big tech platforms have become global forums for exchanging opinions, but there is a downside. Examples have been seen – such as the Umbrella case³⁵ and the terror video from Morocco of a Danish and Norwegian woman³⁶ – where illegal content is shared on social media, spreading quickly to thousands of people and going viral in a short time. The two examples mentioned show that the platforms do not effectively succeed in removing illegal material to a sufficient extent.

But it is not only in the context of illegal content on social media that a problem arises in relation to the responsibility of the platforms. The large digital trading platforms are also used for the purchase and sale of illegal, unsafe and harmful products and services, and it can be difficult to hold the platforms responsible for this. This is partly due to the fact that big tech companies often function exclusively as online trading platforms and thus act as intermediaries without responsibility for the content sold or posted on the platform.

A number of European consumer organisations have purchased and tested 250 different products from online marketplaces such as Wish, Amazon, eBay and AliExpress. 66% of the tested products failed. 165 out of 250 online purchases failed on electrical, physical or chemical safety, some of which were very serious.³⁷ Our increasing consumption through the internet combined with an increasing degree of

illegal behaviour on the internet means that regulation is needed.

In contrast to the liability of the platforms in relation to illegal content and illegal products, it may also be perceived as intrusive and offensive when a platform removes content and products or blocks a profile that is not necessarily illegal. The companies have wide access to decide what they want to allow on their platforms, as they are private companies, where users have to accept the conditions set by the company to use their services. The view that terms and conditions must be accepted as they are, does not take the social significance of the platforms into account. Because even though the premise that these are private companies whose terms the users have accepted is correct, we also need to consider the social importance of these private companies in guiding and developing what freedom of expression means today.

One study shows that there are problems with the deletion of too much legal content on the news media's Facebook pages, but also problems with the deletion of illegal content.³⁸

This creates a dilemma in which we want the platforms to take greater responsibility in relation to illegal content on the one hand, but do not want content moderation where platforms take down so much content that freedom of expression is restricted.



66%

of the tested products failed.



Free, well-functioning media must help support democratic dialogue, in which everyone receives fair payment for their creative work

The use of culture and media by Danish citizens is under increasing influence from foreign tech and media companies. Big tech companies like Alphabet and Facebook Inc dominate the advertising market, which has previously funded newspapers and other publishing activities. Big tech can also censor, promote and price, for example, Danish content without Danish influence. That erodes our free media and the livelihoods of our artists.



Danish content on the major international streaming services

2%

on Netflix

1%

on HBO Nordic

1%

on Amazon Prime

In the past, newspapers and news dissemination on flow TV were the primary sources of news, but we are seeing a global development in which social media are increasingly becoming a gateway to the news.³⁹ To reach a wide audience, traditional media therefore depend on being present on social media and may thus be subject to editorial control by big tech.⁴⁰ The same situation applies to artists and other content producers, who often have limited financial means and depend on digital platforms.

The competition for the attention of Danish media and cultural users has intensified in recent years, as a result of an increasing supply of content from international tech and media companies. Danish content now accounts for just a few percent of the content on the major international streaming services, e.g. 2% on Netflix, 1% on HBO Nordic and 1% on Amazon Prime.⁴¹

The large supply of foreign content sharpens the need for a Danish-based media and cultural life, which is based on Danish culture, social conditions and history, and which can thus create a common reference point for democratic dialogue in Danish society.

A democratic society rests on a free press and an open cultural life that can accommodate the public debate. But the size and market position of big tech means that news media and artists rely on platforms to reach the public. Big tech can also exercise

editorial control and influence access to public service-financed content in app stores.⁴²

Developments in the advertising market are also creating new conditions for traditional media. Since 2007, the largest big tech companies have increased their share of the total advertising revenue on the Internet in Denmark from 19% to 64%, cf. figure 6.⁴³ In the same period, the largest big tech companies have increased the share of total advertising revenue in Denmark from 3% to 42%. This affects the business models and terms of traditional news media.⁴⁴

It also affects the way the traditional news media act, as they adopt new formats to be present on the platforms. An example of this is clickbait headlines, where headlines are not written based on news criteria, but rather written to achieve a good ranking in the opaque algorithms whose primary goal is to create more engagement.⁴⁵

Through its inevitability and size, big tech also plays a significant role in pricing creative content online. A service like YouTube operates with different principles for creative rights compared to the traditional model used in Denmark so far, and a service like Spotify offers little transparency on its payment policy.⁴⁶ This challenges the way we think about creative rights – and ultimately the opportunities to make a living from creative products.



Figure 6

Big tech's share of the total advertising revenue on the Internet in Denmark

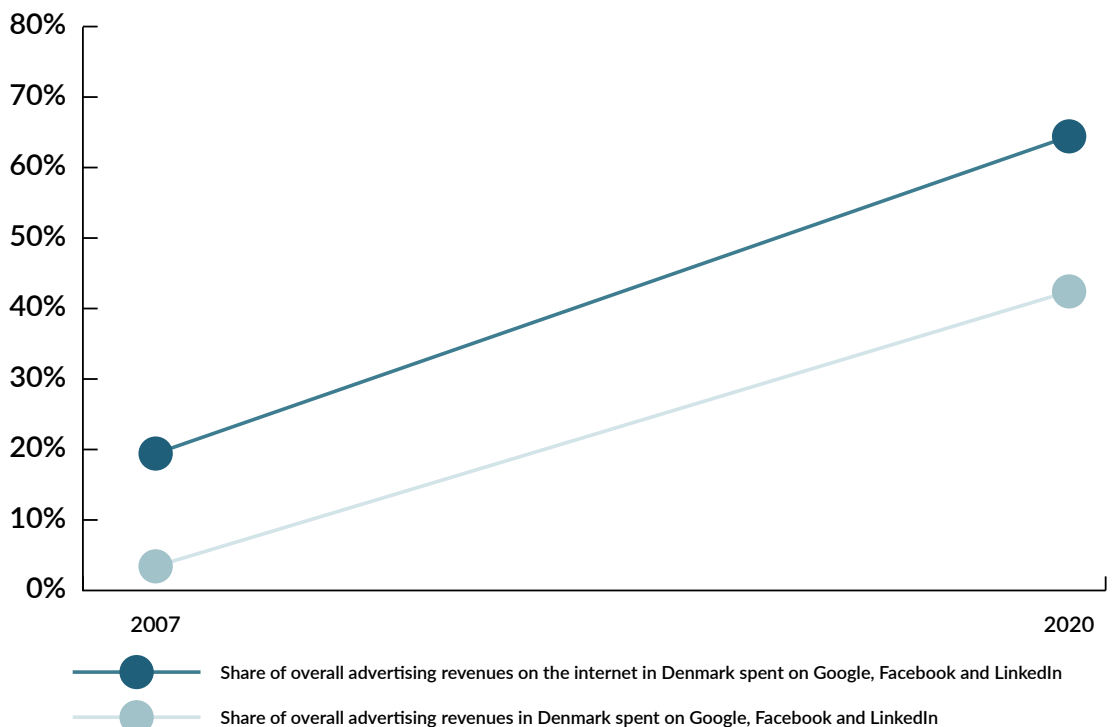
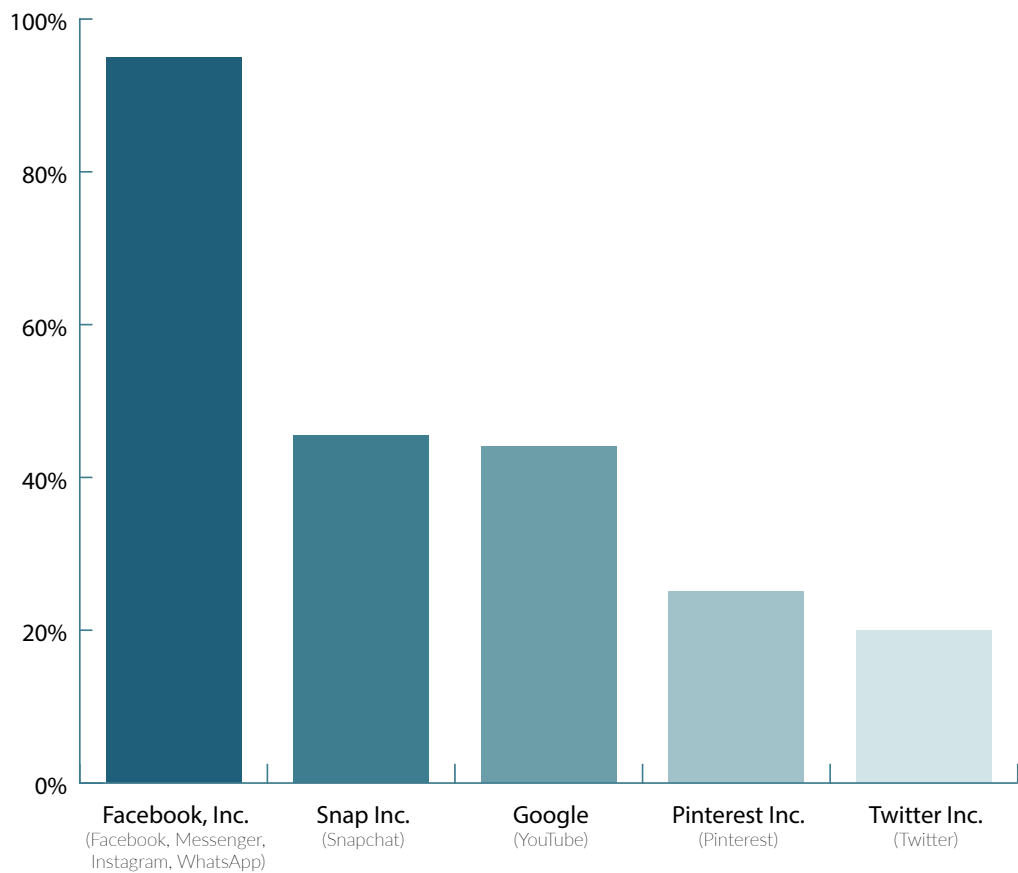




Figure 7

Proportion of Danish citizens on social media by medium



Note: Danish population aged 12 and over.

Social media and streaming services are now an important channel for reaching Danish citizens with Danish-produced content. Among the social media, Facebook is a crucial means of access for Danish citizens. Figure 7 shows that 95% of all Danish citizens who use social media have a profile on one of Facebook's services.⁴⁷

It therefore becomes a problem when digital channels that address Danish citizens are blocked (see infobox). In 2020, DRTV was used weekly or more often by 42% of the Danish population over the age of 4, only surpassed by Netflix (48%) and YouTube (52%).⁴⁸ Danish content producers and public service providers are faced with a challenge to ensure sufficient knowledge and use of their streaming services.



Box 4

Examples of big tech companies exercising editorial control over Danish-produced content

- In August 2020, DR found that Alphabet removed the Ramasjang app from the Google store, due to content in violation of Google's guidelines – despite DR's editorial responsibility for the content.⁴⁹ The Norwegian public service provider NRK has also experienced the same with Google.⁵⁰
- In August 2020, all Danish-produced content from Koda's members (composers and songwriters) was blocked on YouTube due to disagreements during the negotiations between Koda and YouTube over payment. Koda's members were paid an average of DKK 11 per 1,000 streams across music streaming services in 2019.⁵¹



Workers' rights must be protected – including on digital platforms

The business models of digital platforms have affected the labour market and contribute to the increasing numbers of people with atypical employment, temporary employees and platform workers who become "false self-employed". This challenges the usual form of regulation on the labour market in relation to securing uniform workers' rights. Common for this group is that a number of problems arise, including ambiguity about employer liability and employee rights.

In relation to big tech companies and the employment they create in Denmark, it is crucial that workers are guaranteed the same basic rights as the rest of the labour market. For example: the right to free negotiations, the right to strike, the freedom to join a union, etc. Finally, it is crucial that work in Denmark is carried out on usual Danish pay and working conditions. Reasonable relations and dialogue between the different parties on the labour market the social partners are fundamental parts of Danish society.

Technological progress has also meant that more jobs are done via digital platforms. Several platforms have a business model based on the fact that they only mediate the purchase and sale of

services without being a formal employer, which means they make an online marketplace available to traders and buyers. They consider the people who carry out the work as self-employed, even though their affiliation with the platform may be characterised as an employer-employee relationship. They do not have any other work outside the platform, and they therefore become de facto employees of the platform.

By viewing people who work via platforms as self-employed rather than employees, the platforms can avoid adhering to a number of mandatory employer obligations, such as employee rights, working environment standards and occupational injury insurance.

Increased use of "false self-employed" in jobs previously performed by ordinary employees, such as cleaning and food delivery, has consequences for the foundation on which the labour market rests. Firstly, for negotiating payment and exercising rights, such as working environment and occupational injury insurance, in contrast to employees who usually organise themselves. Secondly, for the clarity of the rules that apply to their work and employment, as many platform workers and the trade unions do not actually know whether a platform worker is an employee or self-employed.

The Danish model is based on collective agreements, a high degree of organisation and tripartite cooperation. Overall, organisation of the labour market has declined in recent years, driven by a

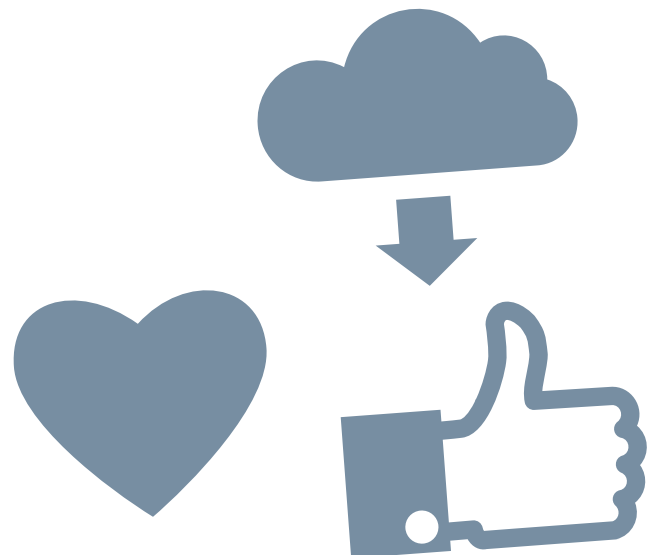
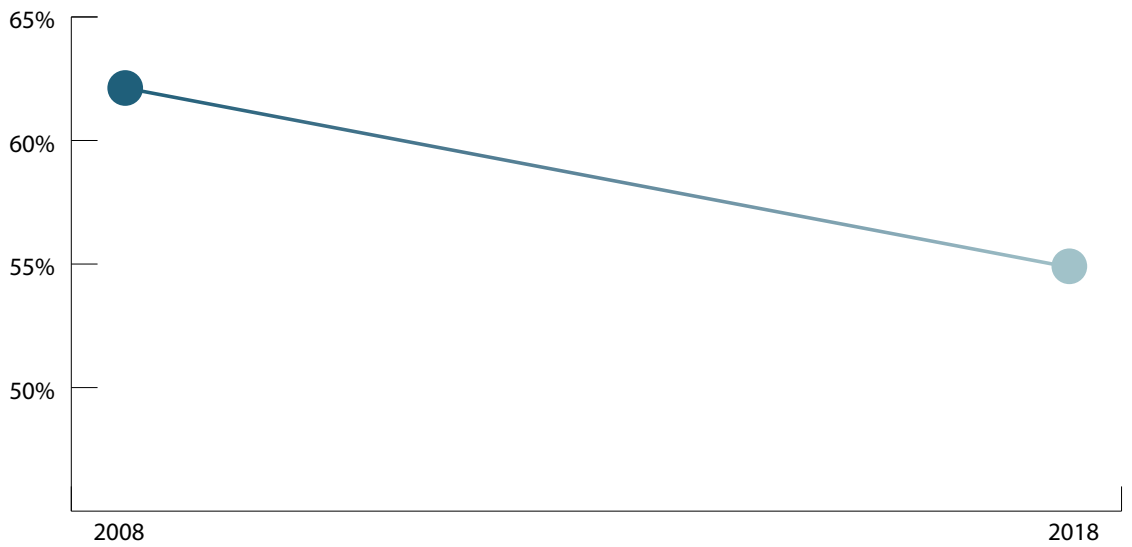
decline in the proportion organised among the traditional trade unions from approx. 62% in 2008 to 55% in 2018, cf. Figure 8.⁵²

The spread of platform work challenges the Danish model. The scope of platform work in Denmark is still relatively limited, and therefore the decrease in the degree of organisation cannot be attributed to platform work. But if trends in the number of platform workers in Denmark follows those seen abroad, it is something that may increase in the future. Furthermore, three researchers at the Research Centre for Labour Market and Organisational Studies (FAOS) have concluded that almost a third of the Danish labour market is atypically employed, which means that they either do not have a permanent position or fewer hours than full-time.⁵³



Figure 8

The degree of organisation in traditional trade unions, 2008-2018







Big tech must contribute to financing the welfare society in line with all other companies

If the largest and richest companies, including tech companies, do not pay fair taxes, the cohesion of our society is at risk. Only if everyone contributes to the community, the tax system remains and is perceived as fair, and only if it is protected can we maintain support for a collectively-funded welfare society.

Companies, including big tech, which base their business model on intangible assets, can operate in a country without a physical presence and have better opportunities than other companies to place those assets in countries where tax conditions are favourable.

Tax systems in many of the countries where these companies operate and make their money are designed so that only business conducted through a company or a permanent establishment in that country is taxed.

A number of countries have sought to address this problem by introducing special national taxes, including sales taxes on digital services. Such national initiatives in themselves present a number of new challenges: International taxation principles and international co-operation come under pressure with the risk of trade wars and counter-reactions, the administrative costs for businesses and tax administration increase, and there is a risk of double taxation for companies.

International discussions are also under way on the tax problems that arise with the spread of the digital

business models. Such problems are global, and therefore global solutions are also sought.

They have also been discussed at length in the OECD. Negotiations on fairer taxation of big tech and other large multinationals have also been going on for some time, and US President Joe Biden has actively entered into the discussion.

Against this background, the G7 countries published a statement on 5 June in support of a global minimum tax of at least 15% and measures to ensure that the very largest global corporations will in future have to pay part of their taxes where they make their money. This also applies to the tech companies.

It is crucial that a solution is found so that everyone pays their fair share of tax, and so that the spread of digital business models does not hamper the opportunities of Denmark and other countries to maintain and expand the key institutions and schemes in our welfare society. If not, the foundations of the welfare state will be eroded. Everyone has to contribute to society and take responsibility.



Competition must be fair and transparent, and consumers must be able to shop safely online

Company size is crucial in digital competition. The largest players can gain economy of scale and network advantages that lead to monopolies, preventing less competitive platforms from entering the market. Big tech companies can also establish themselves as indispensable trading partners, which means they can increasingly set the rules of the game themselves, favouring their own products on their platforms.



8 out of 10

consumers have found that they are presented with statements that force them to make purchases.

Traditionally, competition rules have helped to ensure that players do not abuse their position on the market, and that mergers do not impede effective competition with significant harm to the other players in the market.

But big tech is challenging those competition rules, and most recently in March 2019, the European Commission fined Google Eur 1.49 billion for abuse of its dominant position on the market.⁵⁴

A study of the sales of Danish companies via digital platforms shows they find that digital platforms

have special market power.⁵⁷ 70% of the companies in the survey found it necessary to be present on a specific digital platform, while 66% found it difficult to negotiate trading terms with the platforms. That threatens free competition for Danish companies that want to sell goods or services. The same applies to Danish companies that want to establish a competing platform. Finally, it is also of great importance to Danish consumers, as a well-functioning market helps to ensure good consumer prices, etc.

However, the proliferation of digital platforms has also given us all a much wider range of goods and services,⁵⁸ and Danish citizens are increasingly shopping online. Since 2011, the proportion of Danish citizens who shop online has increased from under three million to just over four million.⁵⁹ But there are also challenges, e.g. when platforms use their data and psychographic tools to create additional sales or advertising. Some of these

measures involve a risk of promoting so-called behavioural market errors, where consumers do not make the choice that best suits their wishes. For example: 8 out of 10 consumers have found that they are presented with statements that force them to make purchases.⁶⁰ These methods and marketing practices are expected to be even more targeted and personalised in the future.

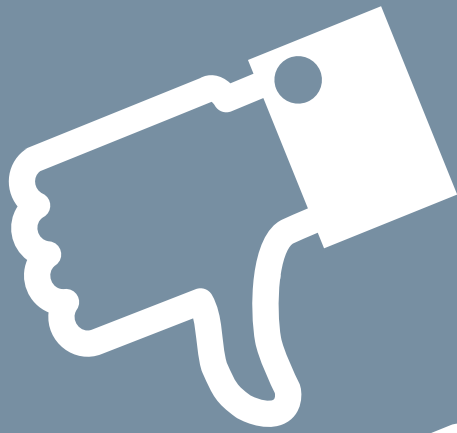


Box 5

American action against big tech

- In October 2020, the Competition Committee of the US House of Representatives presented a report accusing big tech companies such as Alphabet, Apple, Amazon and Facebook Inc of abusing their dominant market position. The report presented various measures to 1) restore competition in the digital economy, 2) strengthen competition rules and 3) strengthen enforcement of competition rules.⁵⁵
- The report has spawned a number of legislative bills, the most far-reaching of which could lead to structural separation of the major players, meaning they will have to break up their company into smaller parts. For example: the law package includes a proposal that big tech companies should not use their monopoly in one business area to monopolize new areas. If the proposal is adopted, it could in extreme cases mean that, for example, Alphabet will have to sell YouTube.⁵⁶







Democratic governments must provide the framework for big tech – not the other way around

It is a threat not only for Denmark and the EU, but for all sovereign states and organisations, that big tech has achieved a position where democratic governmental control is insufficient, and from which it can influence the security of states, including Denmark.

Currently, platforms are establishing themselves in countries other than Denmark, but targeting Danish consumers. On one hand, this means that Danish users can benefit from foreign platforms. But on the other, it places new demands on authorities and enforcement – nationally and internationally. Regulations in the EU are currently under revision, which is important as the existing regulations are outdated and therefore not equivalent to the influence big tech now has.

Because we act, meet and do things digitally, digital infrastructure has become key. Most of Denmark's digital infrastructure is now owned by foreign

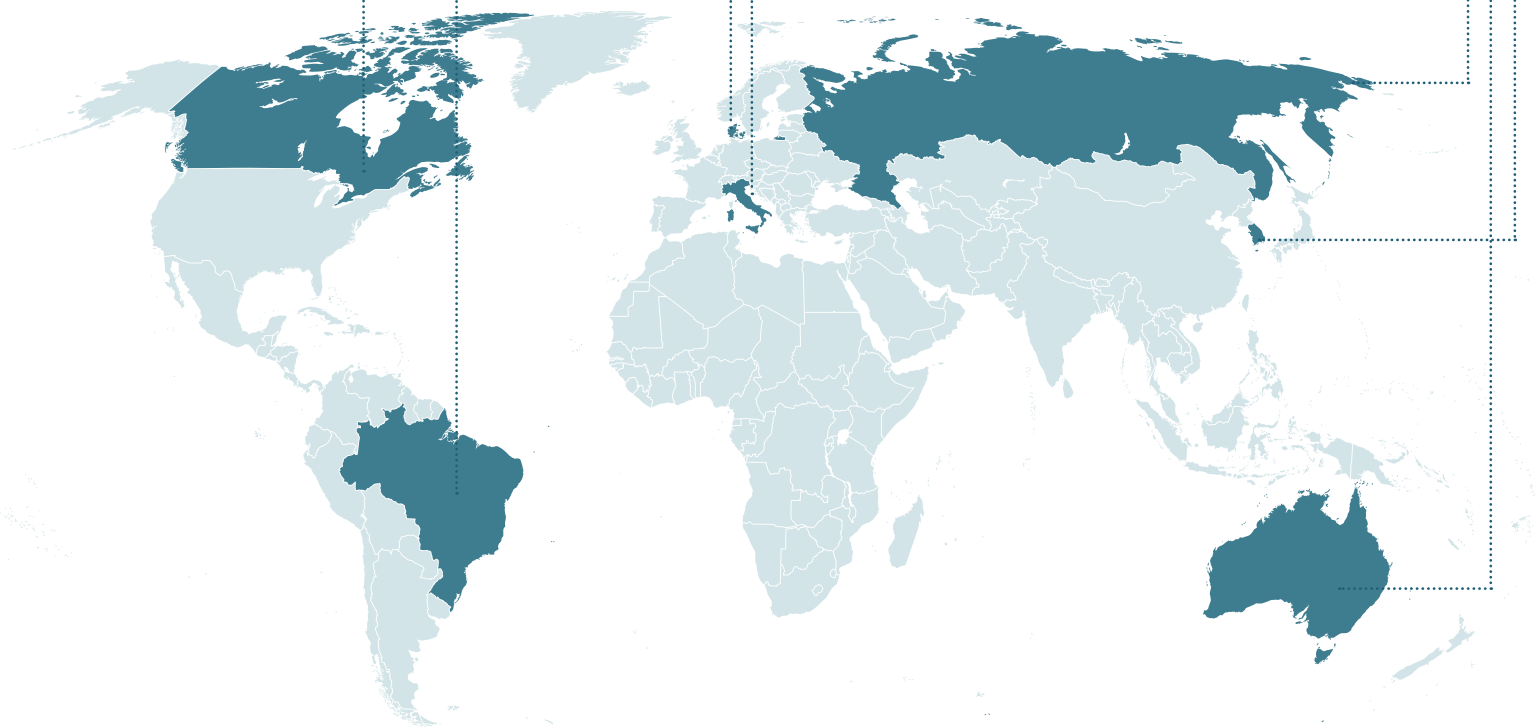
companies.⁶¹ The Corona crisis has shown that we are increasingly dependent on access to websites, apps and online tools. The most current examples are Teams and Zoom, which many of us have used for virtual meetings for the last 18 months. It has also shown us the importance of who owns our technological infrastructure, which in our case, is rapidly concentrating into a few private hands. Certain big tech companies have reached such a size and possess such large amounts of data and knowledge that it is difficult to establish competing platforms. The biggest tech players have a net worth that exceeds most countries' GDP, cf. Figure 10.⁶²⁺⁶³



Figure 10

Net value of selected players compared to the GDP of selected countries

Selected players	Net worth/GDP (DKK billion)
Apple	13.200
Italy	12.300
Microsoft	12.000
Brazil	11.300
Canada	10.600
Russia	10.400
Amazon	10.400
South Korea	10.100
Australia	8.600
Facebook	5.800
Denmark	2.100



Annot. Rounded numbers. GDP in current prices. Converted to DKK; 1 USD=6,13 DKK.

The technological infrastructure is thus concentrated in the hands of a few private players.

When such amounts of data and information are concentrated in the hands of a few, it can pose a security risk.

In recent years, the Danish Defence Intelligence Service has emphasized in various intelligence risk assessments that some non-Western countries seek to support their own foreign and security policy through targeted investments in technology companies, start-ups and entering into joint venture collaborations and sharing acquisitions in selected companies. This may be due to possible close links between companies and government figures, and there is a risk that foreign actors could have non-commercial intentions related to foreign investments in, for example, critical infrastructure. The security consequences can be serious and long-term, and consist of a wide range of risks – from espionage and breakdown of state core functions to risks associated with dependence on foreign states, technology transfer, etc.

Vulnerabilities in the digital infrastructure are also exploited daily to commit cyber attacks, e.g. to steal sensitive information or put key social functions out of play. This places greater demands on the way tech companies tackle the cyber threat, which is becoming increasingly comprehensive and complex.

Social media platforms are also being exploited by state and non-state players for influence, to destabilise and influence democratic elections and undermine confidence in democratic institutions and alliances. Such operations may also affect Denmark. The Defence Intelligence Service has repeatedly concluded that Russian influence campaigns pose a threat to Denmark.⁶⁴ Even though Facebook, for example, has taken steps to prevent the platform from being used to influence democratic elections, more work is needed.

Appendix

1. O'Leary, N. (May 18 2020). Facebook's Zuckerberg calls for more regulation of big tech. From The Irish Times: <https://www.irishtimes.com/business/technology/facebook-s-zuckerberg-calls-for-more-regulation-of-big-tech-1.4256579>
2. Data obtained from <https://www.macrotrends.net/stocks> and <https://seekingalpha.com/>
3. Hoover, G. (20 August 2020). Most valuable companies: The last 25 years. From American Business History Center: <https://americanbusinesshistory.org/most-valuable-companies-the-last-25-years/>
4. FXSSI - Forex Sentiment Board (6 February 2021). TOP 10 - The Most Valuable Companies in the World 2021 List. From fxssi: <https://fxssi.com/top-10-most-valuable-companies-in-the-world>
5. The Palaces and Culture Agency (2020). Media development in Denmark – Social media 2020 – Use, content and relationships. From the Ministry of Culture: https://mediernesudvikling.kum.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2019/Specialrapporter/Sociale_medier_indhold/Sociale_medier_-_brug_indhold_og_relationer.pdf
6. The Palaces and Culture Agency (2020). Media development in Denmark – Social media 2020 – Use, content and relationships. From the Ministry of Culture: https://mediernesudvikling.kum.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2019/Specialrapporter/Sociale_medier_indhold/Sociale_medier_-_brug_indhold_og_relationer.pdf
7. Iqbal, M. (24 May 2021). Facebook Revenue and Usage Statistics 2021. From Business of Apps: <https://www.businessofapps.com/data/facebook-statistics/>
8. Rodriguez, S. (28 April 2021). Facebook revenue rises 48%, driven by higher-priced ads. From CNBC: <https://www.cnbc.com/2021/04/28/facebook-fb-earnings-q1-2021.html>
9. Breinstrup, T. (19 January 2021). Anonymous search engine sets new user record. From Berlingske: <https://www.berlingske.dk/virksomheder/anonym-soegemaskine-saetter-ny-brugerrekord>
10. Breinstrup, T. (10 January 2020). The Danes will soon have to decide whether they want to opt out of Google. From Berlingske: <https://www.berlingske.dk/virksomheder/danskere-skal-snart-beslutte-om-de-vil-fravaelge-google>
11. Statista Research Department (14 January 2021). Google's global brand value from 2006 to 2020. From Statista: <https://www.statista.com/statistics/326046/google-brand-value/>
12. Horváth, E. & Klinkmüller, S. (27. august 2020). The Concept of 'Investment' in the Digital Economy: The Case of Social Media Companies. The Journal of World Investment & Trade, 20(4): 577-617.
13. Gautier, A. & Lamesch, J. (3. februar 2020). Mergers in the Digital Economy. CESifo Working Paper No. 8056.
14. Tassy, A. & Nielsen, MB (November 2020). IT use in the population 2020. From Statistics Denmark: <https://www.dst.dk/Site/Dst/Udgivelser/GetPubFile.aspx?id=29450&sid=itbef2020>

15. Horváth, E. & Klinkmüller, S. (27 August 2020). The Concept of 'Investment' in the Digital Economy: The Case of Social Media Companies. *The Journal of World Investment & Trade*, 20(4): 577-617.
16. Mønsted, C. M. & Yssing, C. (2020). The Danes' use of digital platforms. From the Danish Competition and Consumer Authority:
<https://www.kfst.dk/media/xwffgqvd/incentive-danskernes-brug-af-digitale-platforme.pdf>
17. Horváth, E. & Klinkmüller, S. (27 August 2020). The Concept of 'Investment' in the Digital Economy: The Case of Social Media Companies. *The Journal of World Investment & Trade*, 20(4): 577-617.
18. The Palaces and Culture Agency (2020). Media development in Denmark: Social media 2020 – Use, content and relationships. From the Ministry of Culture:
https://mediernesudvikling.kum.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2019/Specialrapporter/Sociale_medier_indhold/Sociale_medier_-_brug_indhold_og_relationer.pdf
19. The Palaces and Culture Agency (2020). Media development in Denmark: Social media 2020 – Use, content and relationships. From the Ministry of Culture:
https://mediernesudvikling.kum.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2019/Specialrapporter/Sociale_medier_indhold/Sociale_medier_-_brug_indhold_og_relationer.pdf
20. Hardenberg, E. et al. (21 March 2018). Overview: How Cambridge Analytica got – and used – 50 million profiles. From DR. <https://www.dr.dk/nyheder/viden/teknologi/overblik-saadan-fik-og-brugte-cambridge-analytica-50-millioner-profiler>
21. Mønsted, CG & Egedesø, PJ (2020). Danish companies' sales via digital platforms. From the Danish Competition and Consumer Authority: <https://www.kfst.dk/media/cwao5pbi/20201013-danske-virksomheders-salg-p%C3%A5-digitale-plat.pdf>
22. Mønsted, CG & Egedesø, PJ (2020). Danish companies' sales via digital platforms. From the Danish Competition and Consumer Authority: <https://www.kfst.dk/media/cwao5pbi/20201013-danske-virksomheders-salg-p%C3%A5-digitale-plat.pdf>
23. Horwitz, J. & Seetharaman, D. (26 May, 2020). Facebook Executives Shut Down Efforts to Make the Site Less Divisive. From *The Wall Street Journal*:
<https://www.wsj.com/articles/facebook-knows-it-encourages-division-top-executives-nixed-solutions-11590507499>
24. Epinion (2018). Strengthening data ethics and IT security in the field of education. From the Ministry of Children and Education:
<https://www.uvm.dk/publikationer/2018/180822-styrkelse-af-dataetik-og-it-sikkerhed-paa-undervisningsomraadet>
25. Ottosen, M. H. & Andreasen, A. G. (2020). The well-being of children and young people and the use of digital media – two analysis reports. From VIVE:
<https://www.vive.dk/media/pure/15089/4329811>

26. Epinion (2018). Strengthening data ethics and IT security in the field of education. From the Ministry of Children and Education:
<https://www.uvm.dk/publikationer/2018/180822-styrkelse-af-dataetik-og-it-sikkerhed-paa-undervisningsomraadet>
27. Haidt, J. & Twenge, J. (2019). Social media use and mental health: A review. Unpublished manuscript, New York University.
28. Kierkegaard, L. et al (2020). The importance of digital media use for social relationships, communities and stress among children and young people. From the National Board of Health: <https://www.sst.dk/-/media/Udgivelseser/2020/Digital-medibrug-blandt-b%C3%B8rn-og-unge/Digital-medibrug-blandt-boern-og-unge.ashx?la=da&hash=0E05AEC0569295DE340C2F23EB198FE54360D9A>
29. The Palaces and Culture Agency (2020). Media development in Denmark: Social media 2020 – Use, content and relationships. From the Ministry of Culture:
https://mediernesudvikling.kum.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2019/Specialrapporter/Sociale_medier_indhold/Sociale_medier_-_brug_indhold_og_relationer.pdf
30. Statistics Denmark (1 June 2021). Cultural habits 1st quarter 2021. News from Statistics Denmark, no. 206. From Statistics Denmark:
<https://www.dst.dk/Site/Dst/Udgivelser/nyt/GetPdf.aspx?cid=31799>
31. Analyse & Tal (2021). Attacks in the public debate on Facebook. From Trygfonden:
<https://www.tryghed.dk/viden/publikationer/trivsel/angreb-i-den-offentlige-debat-paa-facebook>
32. Ministry of Justice (April 2020). Freedom of expression in Denmark. From the Ministry of Justice: <https://www.justitsministeriet.dk/sites/default/files/media/Pressemeddelelser/pdf/2020/ytringsfrihedsundersogelse.pdf>
33. Kildegaard, K. & Domino, S. (13 May 2021). Concerned top lawyers sound alarm over trend on social media: Brutal hatred threatens a crown jewel in society. From Berlingske:
<https://www.berlingske.dk/politikymrede-topjurister-slaar-alarm-over-tendens-paa-sociale-medier-brutalt>
34. Horwitz, J. & Seetharaman, D. (26 May 2020). Facebook Executives Shut Down Efforts to Make the Site Less Divisive. From The Wall Street Journal:
<https://www.wsj.com/articles/facebook-knows-it-encourages-division-top-executives-nixed-solutions-11590507499>
35. Quass, L. (15 January 2018). More than 1,000 young people are accused of sharing child pornography online. From DR: <https://www.dr.dk/nyheder/indland/over-1000-unge-sigtes-have-delt-boerneporno-paa-nettet>
36. Toft, E. (7 March 2019). 14 people charged with sharing Morocco video. From DR: <https://www.dr.dk/nyheder/indland/14-personer-sigtet-dele-marokko-video>
37. Brøndsted, TQ (27 February 2020). Wish, Amazon and AliExpress: 66% of tested products fail in tests. Taken from the Danish Consumer Council Tænk:
<https://taenk.dk/raadgivning-og-rettigheder/online-shopping/wish-amazon-aliexpress-produkter-dumper>

38. Justitia (28. maj 2020). Digital ytringsfrihed og sociale medier - en undersøgelse af hvilke kommentarer der bliver slettet fra fem danske nyhedsmediers facebooksider. Hentet fra justitia-int.org: http://justitia-int.org/wp-content/uploads/2020/05/Rapport_Digital-ytringsfrihed-og-sociale-medier_31052020.pdf
39. Newman, N. m.fl. (2020). Reuters Institute Digital News Report 2020. Hentet fra Reuters Institute: https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf
40. Rønn, MR et al (31 May 2021). 25 media chiefs: Big tech should not have control over our public debate. From Altinget: <https://www.altinget.dk/artikel/25-medierchefer-techgiganterne-skal-ikke-have-kontrollen-med-vores-offentlige-samtale>
41. Knudsen, S. (23 November 2020). Sticking together on the important things: One-year status report on DR's strategy. From DR: <https://www.dr.dk/om-dr/organisationen/sammen-om-det-vigtige-etaars-status-drs-strategi>
42. Hilstrøm, C. (5 August 2020). Google removes DR's Ramasjang app because liquorice pipe appears. From DR: <https://www.berlingske.dk/aok/google-fjerner-drs-ramasjang-app-fordi-der-optraeder-lakridspiber>
43. Danish Media Research for the Ministry of Culture (2021)
44. The Palaces and Culture Agency (2017). The globalisation of the Danish media industry. From the Ministry of Culture: https://slks.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2017/Specialrapporter/Internationale_aktoerer/Rapport_og_bilag/Sammenfatning.pdf
45. The Palaces and Culture Agency (2017). The globalisation of the Danish media industry. From the Ministry of Culture: https://slks.dk/fileadmin/user_upload/dokumenter/medier/Mediernes_udvikling/2017/Specialrapporter/Internationale_aktoerer/Rapport_og_bilag/Sammenfatning.pdf
46. European Commission (14 September 2016). Impact Assessment on the modernisation of EU copyright rules. 301 final. From EUR-Lex: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52016SC0301&from=EN>
47. Kantar Gallup/Social Media Life 2020. Data processed by the Ministry of Culture.
48. Kantar Index Denmark for DR Media Research (2020). Media trends 2020. From DR: https://www.dr.dk/static/documents/2021/01/22/mediatudviklingen_2020_v2_53f01f21.pdf
49. Hilstrøm, C. (5 August 2020). Google removes DR's Ramasjang app because liquorice pipe appears. From DR: <https://www.berlingske.dk/aok/google-fjerner-drs-ramasjang-app-fordi-der-optraeder-lakridspiber>
50. Vilberg, B. (29 June 2019). Google believes that the Fantorangen-fjerting is not child-friendly. From nrk: https://www.nrk.no/kultur/_google-mener-fantorangen-fjerting-ikke-er-barnevennlig-1.14608452
51. Koda (n.d.). Streaming services. From Koda: <https://www.koda.dk/medlem/udbetaling/her-far-du-udbetaling-fra/online/streamingtjenester>

52. Figures for the degree of organisation are calculated for employees and the unemployed between the ages of 16-64. The figures differ from similar statistics from FAOS. This is because they calculate the degree of organisation for employees and the unemployed who have reached the age of 15. They also include cross-border commuters in their figures.
53. Ilsøe, A. & P. Larsen, T. (5 February 2021). Researchers: The number of atypical employees is growing, but is being overlooked in the statistics. From Altinget:
<https://www.altinget.dk/arbejdsmarked/artikel/forskere-antallet-af-atypisk-ansatte-vokser-men-bliver-overset-i-statistikkerne>
54. European Commission (20 March 2019). Antitrust: Commission fines Google €1.49 billion for abusive practices in online advertising. From the European Commission:
https://ec.europa.eu/commission/presscorner/detail/en/IP_19_1770
55. Subcommittee on Antitrust, Commercial and Administrative Law of the committee and the judiciary (2020). Investigation of competition in digital markets. Majority Staff Report and Recommendations. From the House Committee on the Judiciary: https://judiciary.house.gov/uploadedfiles/competition_in_digital_markets.pdf
56. Zakrzewski, C. (11 June 2021). Bipartisan proposals in House would mean major changes for the way tech giants operate. From the Washington Post: <https://www.washingtonpost.com/technology/2021/06/11/antitrust-legislation-curbs-silicon-valley/>
57. Mønsted, CG & Egedesø, PJ (2020). Danish companies' sales via digital platforms. From the Danish Competition and Consumer Authority:
<https://www.kfst.dk/analyser/kfst/publikationer/dansk/2020/20200713-danske-virksomheders-salg-via-digitale-platforme/>
58. Konkurrence- og Forbrugerstyrelsen (27. november 2019). Digitale platforme - en introduktion. Hentet fra Konkurrence- og Forbrugerstyrelsen: <https://www.kfst.dk/media/55725/digitale-platforme.pdf>
59. Tassy, A. & Nielsen, MB (November 2020). IT use in the population – 2020. From Statistics Denmark: <https://www.dst.dk/Site/Dst/Udgivelser/GetPubFile.aspx?id=29450&sid=itbef2020>
60. Mønsted, C. G. & Yssing, C. (2020). The Danes' use of digital platforms. From the Danish Competition and Consumer Authority:
<https://www.kfst.dk/media/xwffgqvd/incentive-danskernes-brug-af-digitale-platforme.pdf>
61. Bernsen, M. (5 March 2021) The net tightens. From Weekendavisen:
https://www.weekendavisen.dk/2021-9/samfund/nettet-strammes?utm_medium=Social&utm_source=Facebook
62. Digital Information World (13 April 2021). Apple, Microsoft, Amazon and Facebook are a lot richer than most of the countries. From Digital Information World:
<https://www.digitalinformationworld.com/2021/04/apple-microsoft-amazon-and-facebook-are.html>
63. Danmarks Statistik. (n.d.). BNP. Hentet fra Danmarks Statistik: <https://www.dst.dk/da/Statistik/emner/nationalregnskab-og-offentlige-finanser/aarligt-nationalregnskab/bnp>
64. Danish Defence Intelligence Service (2020). Intelligence risk assessment 2020 – a current assessment of conditions abroad of importance to Denmark's security. From the Danish Defence Intelligence Service: <https://fe-ddis.dk/globalassets/fe/dokumenter/2020/risikovurderinger/-risikovurdering-2020-.pdf>



1. We want a society in which the business models of big tech must be subject to democratic frameworks



2. We want a society in which children and young people must have a safe childhood with a healthy balance between the digital world and the physical world



3. We want a society in which big tech must support democratic debate – rather than undermine it through digital echo chambers and polarisation



4. We want a society in which big tech must take greater responsibility for the content on its platforms



5. We want a society in which free, well-functioning media must support democratic debate, in which everyone receives fair payment for their creative work



6. We want a society in which workers' rights must be protected – including on digital platforms



7. We want a society in which big tech must contribute to the financing of the welfare society in line with all other companies



8. We want a society in which competition must be fair and transparent, and consumers must be able to shop safely online



9. We want a society in which democratic governments must set the framework for big tech – not the other way around

June 2021

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