

## A COMPARATIVE ANALYSIS OF MEDIA PRACTICES IN SELECT COUNTRIES THROUGH THE LENS OF NORMATIVE PRESS THEORIES


<sup>1</sup>Christianah Shade Ade-Johnson, Ph.D.; <sup>2</sup>Toyin Adinlewa, Ph.D.; Olabode Henry Taose

<sup>1, 2, & 3</sup>Department of Mass Communication,  
Adekunle Ajasin University, Akungba-Akoko, Ondo State

<sup>1</sup>[sunshineoasis12@gmail.com](mailto:sunshineoasis12@gmail.com)

+2348035780487

<sup>2</sup>[toyin.adinlewa@aaua.edu.ng](mailto:toyin.adinlewa@aaua.edu.ng)

 <https://orcid.org/0000-0002-2343-9046>

+2348066741605

<sup>3</sup>[taoseh@gmail.com](mailto:taoseh@gmail.com)

+2347063054533

### Abstract

This study examines the application and relevance of normative theories of the press across various political and cultural contexts. Using a qualitative comparative case study approach, it analyses media practices in countries including China, Russia, North Korea, Afghanistan, Nigeria, Sweden, and the United States. Anchored on the four classical normative theories (Authoritarian, Libertarian, Soviet-Communist, and Social Responsibility), with consideration of Development and Democratic-Participant theories, the paper explores how national media systems align with or deviate from theoretical ideals. The findings reveal that while no country strictly adheres to a single theory, dominant tendencies exist, influenced by historical, political, and cultural factors. The study concludes that hybrid media systems are now the norm, challenging the applicability of rigid theoretical classifications and calling for a different, context-based understanding of press freedom and media regulation globally.

**Keywords:** Normative Press Theories, Comparative Media Systems, Press Freedom, Authoritarianism, Social Responsibility, Media Regulation

### Introduction

In the field of communication studies, a theory is an organised bundle of concepts that elucidate the connections between them in order to improve our comprehension of a particular phenomenon. According to Magsamen-Conrad (2023), it gives a framework for defining, comprehending, anticipating, and eventually regulating occurrences. Theories are more than just speculations; they provide views that assist to organise learning and experience into intelligible frameworks (Magsamen-Conrad, 2023). They offer an organised description of why and how things operate in a certain setting.

For instance, the Normative theories of the Press are predicated on the assumption that the Press assumes the colouration of the society it operates. Siebert, Peterson and Schramm, (1995) echo this in (Anaeto et al, 2008) that “The Press always takes on the form and coloration of the social and political structure within which it operates.” Daramola (2003) adds that the operation of the media in any given country is a lot of time tied to the political structure of the country. Meanwhile, Baran & Davis (2010) proposition on Normative theories through its ontology and epistemology definitions has given this work the anchor upon which comparisons can be drawn from different countries in relation to the four predominant theories.

The scholars opine that what is known is situational. In other words, what is real or knowable about a media system is real or knowable only for the specific social system in which that system exists. On its epistemology, they argue that we can only judge the worth of a given media system in comparison to the ideal espoused by the particular social system in which it operates.

This study analysed the operations of the theories – Authoritarian, Libertarian, Soviet-Communist, Social Responsibility, Development and Democratic-Participant media theory – in countries such as North Korea, China, Russia, United States of America, Sweden, Nigeria, and mentioned other few ones in passing. Examples of the situational practicality of these theories in these countries were drawn for better understanding.

These countries were chosen for their population, press market, strong democratic principles and their likelihood to better explain the situation under the scope of examination.

## **Literature Review**

The normative theories of the Press have long served as analytical tools for understanding the role and expectations of the media in different societal structures. According to Siebert, Peterson and Schramm (1956), the media reflects the political and social framework of the society in which it operates. Daramola (2003) also supports this by stating that the operation of the media is closely aligned with the political structure of a country. Baran and Davis (2010) expand this understanding through ontological and epistemological lenses, arguing that what is knowable and valuable in a media system is rooted in the unique context of each society.

Anaeto et al. (2008) and Alao et al. (2013) contribute to the understanding of the development of the six media theories: Authoritarian, Libertarian, Soviet-Communist, Social Responsibility, Development, and Democratic-Participant. These theories represent diverse political ideologies and societal expectations about how the media should function.

The literature suggests that pure adherence to any one theory is rare; instead, media systems often reflect hybrid models shaped by national interests, political ideologies, and socio-economic realities. There is a growing emphasis on comparative studies that contextualize these theories within the practical realities of media operations across nations.

## **Methodology**

This research used a qualitative comparative case study technique. Selected countries (Russia, North Korea, China, Afghanistan, Nigeria, Sweden, and the United States) were picked for their adherence to normative press theories. Each nation has a distinct dominant media system, shaped by its political structure, press history, and socio-cultural dynamics. Academic books, Reporters Without Borders and the United Nations' worldwide press freedom rankings, media law, and reputable news stories are among the primary data sources. The investigation is on determining how normative ideas materialise in real-world behaviours in each nation. Examples were selected to demonstrate the dominant or hybrid theory in action, offering a solid comparison across locations.

## **Findings**

### **Authoritarian Theory**

Countries like Russia, North Korea, and Afghanistan exhibit strong authoritarian tendencies. Media in these states are heavily censored, journalists face persecution, and state narratives dominate. Russia's suppression of anti-war journalism in Ukraine-Russia war and North Korea's harsh punishments for accessing foreign media underscore authoritarian control. Afghanistan under the Taliban imposes restrictions, especially on female journalists, aligning with authoritarian and religious orthodoxy.

### **Soviet-Communist Theory**

China exemplifies the Soviet-Communist theory with its state-controlled media and censorship mechanisms. The Chinese Communist Party uses the media to propagate state ideology. The 'Great Firewall' limits foreign content, while domestic surveillance ensures adherence to state narratives. Unlike Russia, China's communist ideology remains intact, making it a contemporary model of this theory.

### **Libertarian Theory**

The United States represents the libertarian model, advocating for a free press. However,

recent administrations have seen tensions between the media and government. The use of the Espionage Act and political attacks on media outlets have raised concerns about declining press freedom, highlighting that even libertarian systems are not immune to challenges.

**Social Responsibility Theory**

Sweden embodies the social responsibility model, combining press freedom with accountability. The 1766 Freedom of the Press Act underpins this tradition. Other democracies like Nigeria, the UK, and Canada implement similar frameworks through regulatory bodies such as the Nigeria Press Council, Ofcom, and CRTC, respectively.

**Comparative Synthesis**

Across the nations studied—North Korea, China, Russia, Afghanistan, Nigeria, the United States, and Sweden—a distinct pattern of hybrid media practices emerges, breaking from the rigidity of traditional normative ideas. Rather than adhering rigidly to authoritarian, libertarian, or social responsibility principles, modern press systems represent a pragmatic combination impacted by political environment, historical precedents, and emerging digital dynamics (Baran & Davis, 2012; Anaeto et al., 2008). Government control is a worldwide constant; whether via overt censorship as seen in North Korea and China (Reporters Without Borders, n.d.) or regulatory monitoring as shown in Sweden and Nigeria (UNESCO, n.d.; NBC, 2019), no country provides unrestricted press freedom. National security, in specific, is an often used excuse for censorship, from North Korea's ideological control to limits on whistleblowers and wartime reporting in the United States (CNN, 2025; Women in Journalism, n.d.). This convergence highlights a fluid international press landscape in which normative norms are used selectively and hybridisation is now the prevalent trend.

**Model 1: Spectrum of Normative Press Practices Across Countries**

A continuum model to show how countries blend or skew toward particular normative theories.



**Insights:** Countries do not fit well into a single theory; instead, most function in hybrid zones, modifying components to the circumstance. Even in democracies, authoritarianism prevails during times of crisis. Social responsibility is becoming more prominent in democracies, albeit with limited freedom.

### Model 2: Normative Theory Alignment and Media Practice Indicators

This matrix model links normative theory with media control indicators and country examples:

		High control	Low control
High freedom	High freedom	<b>Authoritarian</b> <ul style="list-style-type: none"><li>• State ownership</li><li>• Strict censorship</li></ul> <b>North Korea</b> <b>Russia</b>	<b>Libertarian</b> <ul style="list-style-type: none"><li>• Editorial autonomy</li><li>• Market-driven</li></ul> <b>United States of America</b>
	Low freedom	<b>Soviet-Communist</b> <ul style="list-style-type: none"><li>• State ownership</li><li>• Party/state ends</li></ul> <b>China</b> <b>Afghanistan</b>	<b>Social Responsibility</b> <ul style="list-style-type: none"><li>• Self-regulation</li><li>• Ethics of journalists</li></ul> <b>Sweden</b> <b>Nigeria</b>

**Insights:** Observed indicators include restrictions, arrests, propaganda, lethal injections, an Internet firewall, censorship, surveillance, and party narratives. Autonomous media, FOIA legislation, and press assaults in crisis situations; Legal systems, regulatory bodies, ethical duties, dynamic censorship/freedom ratio, situational openness.

### Discussion

The study indicates that normative theories are seldom used in their purest versions, despite their analytical value. The majority of nations use hybrid models, which include aspects of many different theories. The rigid classification put forward by classical thinkers is called into question by this fact. Globalisation and technical advancements have also made it harder to distinguish between old theory-bound practices.

Democratic nations struggle with regulatory restrictions and misinformation, whereas authoritarian regimes use surveillance technology more often to stay in power. The demands of national interest and social obligation often temper the libertarian ideal. It is necessary to reconsider normative paradigms in light of the worldwide trend towards hybrid systems in order to account for new complexity.

Results show how journalistic freedom is eroding globally, especially in authoritarian and war-torn nations. The Russian case highlights a systematic and brutal onslaught on journalists both within and outside the country. Deliberate assaults on frontline journalists have resulted in several fatalities since the 2022 invasion of Ukraine, further solidifying the regime's animosity towards independent reporting. Along with these deadly measures, Russia has increased the arbitrary imprisonment, physical attacks, and legal punishment of journalists who cover anti-war demonstrations. Women in Journalism ([www.womeninjournalism.org](http://www.womeninjournalism.org)) has recorded the drone assaults, kidnappings, poisonings, and imprisonments that journalists experience. The 2023 poisoning of journalist Elena Kostyuchenko in Munich and the murder of Victoria Amelina after a missile attack in Kramatorsk serve as prime examples of the international scope of Russia's anti-press effort.

In Afghanistan, media freedom remains tenuous, worsened by Taliban control. While the country had early media developments—such as the establishment of Saraj-ul-Akhbar in 1906 and radio broadcasting in 1925—the reality has been long-standing suppression. The joint report by the UN Assistance Mission in Afghanistan (UNAMA) and OHCHR documented 336 violations against media professionals between August 2021 and September 2024 (United Nations, 2024). Journalists operate

under unclear regulations and face intimidation for perceived criticism. Particularly, female journalists encounter systemic discrimination and are excluded from specific assignments. Alao et al. (2013) note that while the 2004 Constitution provides for media freedom, any publication contrary to Islamic principles is punishable. The work of Reporters Without Borders further supports claims of press suppression, highlighting “no-go” zones for journalists and threats from both local and national authorities. Cases like the incarceration of Mortaza Behboudi and restricted access to social media affirm the extent of press suppression (Beh Lih Yi & Rahmani, CPJ.org).

In North Korea, the regime's media control aligns with classical authoritarian and Soviet-Communist media theories. According to Reporters Without Borders, the DPRK ranks 177th out of 180 in the 2024 Press Freedom Index, reflecting severe repression. The leadership of Kim Jong-un imposes absolute censorship, allowing only state-sanctioned content. Instances such as the execution of two 15-year-old boys for listening to K-pop and the public trial of soldiers for possessing foreign media illustrate the brutal enforcement of information control. These examples demonstrate how media in North Korea is not merely restricted but used as a propaganda arm to reinforce totalitarian rule.

The Soviet-Communist media theory, originating in the 1917 Russian Revolution and grounded in Marxist ideologies, posits that media should serve the state and the working class (Anaeto et al., 2008; Daramola, 2003). This theoretical framework, although modified over time, finds modern expression in China. The Chinese Communist Party monopolizes media ownership and content, regulating narratives to reflect party ideology. Reporters Without Borders labels China the “world’s largest prison for journalists.” Internet access is strictly governed through surveillance and the “Great Firewall,” which blocks access to platforms like Facebook and Twitter (Statista, 2024). Hawkins et al. (2024) report arrests of citizens for using VPNs to bypass state censorship, while Hunt et al. (CNN, 2013) reveal that over two million people serve as online censors or “public opinion analysts.”

Contrasting these authoritarian models is Sweden, a representative of the Social Responsibility Theory. The Swedish Freedom of the Press Act of 1766, the world’s first legal guarantee of press freedom, continues to be a cornerstone of its democratic ethos. While press freedom is encouraged, the legislation enforces responsibility through penalties for misuse. The Act, especially in its 1949 revision (1949:105), defines the role and accountability of a “responsible editor,” emphasizing balanced, ethical journalism.

Global reflections of social responsibility in media regulation include agencies such as the Federal Communication Commission (FCC) in the United States, Nigeria Press Council (NPC) and Nigerian Broadcasting Commission (NBC) in Nigeria, Ofcom in the United Kingdom, CRTC in Canada, and the International Telecommunication Union (ITU). These institutions oversee standards ranging from licensing and ownership to content regulation, each contextualized to national or international needs.

In Nigeria, press freedom is variable and heavily influenced by the disposition of the administration in power. Although the right of Information Act (FOIA) guarantees legal access to public information, official control via the Nigeria Broadcasting Commission (NBC) often restricts this right. Nigeria is consistent with Development Media Theory in that the government wants the media to reflect national development narratives while avoiding criticism, yet also demonstrates authoritarian tendencies when opposing viewpoints emerge. The President's tweet interrupted national communication and inhibited internet activity (Princewill & Busari, 2021). NBC has also suspended Channels TV for showing an interview with a banned IPOB spokesman (Premium Times, 2021), and Daar Communications (AIT and RayPower FM) was shut down in 2019 for allegedly airing “inflammatory” information against the state (Al Jazeera). Recently, Kano State prohibited live political programming and limited media material considered controversial (Punch, 2025), while the Zamfara State administration shut down numerous broadcast stations for broadcasting an opposition demonstration (MFWA, 2022). These trends demonstrate Nigeria's press paradigm as very mixed, alternating between social/developmental responsibility and authoritarian repression, sometimes guided by governmental convenience.

Collectively, these cases and regulatory examples underscore a continuum of media freedom—ranging from totalitarian repression to democratic responsibility. While countries like Russia, Afghanistan, North Korea, and China exemplify varying intensities of authoritarian control, nations like Sweden and Nigeria demonstrate how media freedom can thrive under guided responsibility. The global

landscape thus reflects diverse applications of media theories and highlights the critical importance of safeguarding journalistic integrity and independence.

## Conclusion

The implementation of normative press theories varies greatly across nations, influenced by historical, political, and cultural considerations. While basic theories provide valuable lenses, real-world media systems display hybrid properties that defy strict theoretical categories. Recognising these complexity is critical for evaluating press freedom and developing successful media policy in a continually changing global environment.

## References

- Ajaegbu, O. O., & Ajaegbu, C. (2024). The new democratisation: Social media impact on the political process in Sub-Saharan Africa. *Frontiers in Communication*, 9. <https://doi.org/10.3389/fcomm.2024.1394949>
- Ajaegbu, O. O., Ajaegbu, C., & Quilling, R. (n.d.). Nigeria EndSARS protest: False information mitigation hybrid. International Information and Engineering Technology Association. <https://www.iieta.org/download/file/fid/77647>
- Al Jazeera. (2019, June 7). *Nigeria shuts down private TV, radio stations tied to opposition*. <https://www.aljazeera.com/news/2019/6/7/nigeria-shuts-down-private-tv-radio-stations-tied-to-opposition>
- Alao, D., Uwom, O., & Alao, A. (2013). Theory and practice of international communication. GrailGraphix.
- Anaeto, S. G., Onabajo, O. S., & Osifeso, J. B. (2008). Models and theories of communication. African Renaissance Books Incorporated.
- Baran, S. J., & Davis, D. K. (2012). Mass communication theory: Foundations, ferment, and future (6th ed.). Wadsworth Cengage Learning.
- Chiu, C., Ip, C., & Silverman, A. (n.d.). Understanding social media in China. McKinsey & Company. <https://www.mckinsey.com/~media/McKinsey/Business%20Functions/Marketing%20and%20Sales/Our%20Insights/Understanding%20social%20media%20in%20China.pdf>
- Daramola, I. (2003). Introduction to mass communication (2nd ed.). Rothan Press.
- Hawkins, A., & Lin, C. (2024, September 2). How China's internet police went from targeting bloggers to their followers. *The Guardian*. <https://www.theguardian.com/world/article/2024/sep/02/how-chinas-internet-police-went-from-targeting-bloggers-to-their-followers>
- Hunt, K., & Xu, C. (2013, October 7). China employs 2 million to police internet. *CNN*. <https://edition.cnn.com/2013/10/07/world/asia/china-internet-monitors/index.html>
- Mackintosh, T. (2025, May 15). Trump moves to close down Voice of America. *BBC News*. <https://www.bbc.com/news/articles/cvge4109r3o>
- Magsamen-Conrad, K. (2023). Communication theory: A foundation for understanding. In *Communication research in real life*. University of Iowa Pressbooks. Retrieved from <https://pressbooks.uiowa.edu/ssresearchmethodscommunicationonline/chapter/communication-theory-a-foundation-for-understanding/>
- Media Foundation for West Africa (MFWA). (2022, October 15). *Nigerian state govt shuts down media houses for covering opposition's rally*. <https://mfwa.org/nigerian-state-govt-shuts-down-media-houses-for-covering-oppositions-rally/>
- Policy Center for the New South. (n.d.). The evolving role of social media in the 2024 US elections. <https://www.policycenter.ma/podcasts/evolving-role-social-media-2024-us-elections>
- Premium Times. (2021, April 26). *NBC reportedly suspends Channels TV over IPOB interview*. <https://www.premiumtimesng.com/news/top-news/457676-just-in-nbc-reportedly-suspends-channels-tv-over-ipob-interview.html>
- Princewill, N., & Busari, S. (2021, June 4). Nigeria bans Twitter after company deletes President Buhari's tweet. *CNN*. <https://amp.cnn.com/cnn/2021/06/04/africa/nigeria-suspends-twitter>
- Punch Newspapers. (2025, May 9). *Kano govt bans live political programmes on TV, radio*. <https://punchng.com/kano-govt-bans-live-political-programmes-on-tv-radio/>
- Reporters Without Borders. (n.d.). China. <https://rsf.org/en/country/china>

- Reporters Without Borders. (n.d.). North Korea. <https://rsf.org/en/country/north-korea>
- Stelter, B. (2025, March 15). Voice of America channels fall silent as Trump administration guts agency and cancels contract. CNN. <https://www.cnn.com/2025/03/15/media/voice-of-america-trump-cuts/index.html>
- Swedish Parliament. (1949). The Freedom of the Press Act (1949:105). <https://www.riksdagen.se/globalassets/05.-sa-fungerar-riksdagen/demokrati/the-freedom-of-the-press-act-2023-eng.pdf>
- Thomala, L. L. (2025, February 20). Social media in China. Statista. <https://www.statista.com/topics/1170/social-networks-in-china/>
- UNESCO. (n.d.). The Swedish Freedom of the Press Ordinance of 1766: The world's first legislation guaranteeing free communication of information. <https://www.unesco.org/en/memory-world/swedish-freedom-press-ordinance-1766-worlds-first-legislation-guaranteeing-free-communication>
- United Nations. (2024, November 26). UN report reveals widespread restrictions on media freedom in Afghanistan. <https://news.un.org/en/story/2024/11/1157511>
- Women in Journalism. (n.d.). Russia's war on the press. <https://www.womeninjournalism.org/infocus-all/russias-war-on-the-press>