



# Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

Country report: Lithuania

*Aukse Balcytiene, Vytautas Magnus University*

*Kristina Juraite, Vytautas Magnus University*

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# 1. About the project

## 1.1. Overview of the Project

*The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States and Candidate Countries of the European Union, and considering both online and offline news environments. This narrative report has been produced within the framework of the implementation of the MPM carried out in 2019, under a project financed by a preparatory action of the European Parliament. The implementation was conducted in 28 EU Member States, Albania and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.*

## 1.2. Methodological note

*The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the case of Italy where data collection was carried out centrally by the CMPF team. The research is based on a standardised questionnaire and apposite guidelines that were developed by the CMPF.*

*In Lithuania the CMPF partnered with Aukse Balcytiene, Kristina Juraite (Vytautas Magnus University), who conducted the data collection, scored and commented the variables in the questionnaire and interviewed relevant experts. The report was reviewed by CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts).*

*Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1 below).*

<b>Basic Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for people with disabilities
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Access to media for women
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Media literacy

Table 1: Areas and Indicators of the Media Pluralism Monitor

*The Monitor does not consider the digital dimension to be an isolated area but rather as intertwined with traditional media and existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor allows for an extraction of a digital-specific risk score and the report contains a specific analysis of risks related to the digital news environment.*

*The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk.*

On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk.

**Disclaimer:** The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, the MPM2020 scores may not be fully comparable with MPM2017 ones. For more details, see the CMPF report on MPM2020, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

## 2. Introduction

Lithuania (territory 65 300 km<sup>2</sup>) is situated on the South-Eastern coast of the Baltic Sea. It is bordered by Latvia to the North, Belarus to the East and South, Poland to the South, and Kaliningrad Oblast (a Russian territory) to the Southwest. At the beginning of 2020, the population of Lithuania was 2.79 million. The number of people was in a steady decline since Independence in 1990 (3.7 million). Emigration and a higher mortality rate than birth rates are the main reasons for population decline.

Lithuania is an ethnically homogeneous country with Polish and Russian-speaking being the biggest minorities (6.6% and 5.8% respectively of the total population). Most of Lithuania's population resides in cities. The official language of the country is Lithuanian.

Lithuania is a member of the European Union and NATO since 2004 and a member of the Eurozone as of 2015. In 2019, the GDP per capita in Lithuania was 80% of the EU average.

Aside from the country's geographic location and size, political culture acts as yet another decisive factor determining the country's social and political identification that is also mirrored in the specificities of media culture and patterns of professionalization of journalism in the country (Balčytienė, 2012; Jastramskis, 2012). The contemporary media ecosystem in Lithuania displays a number of specificities. Media ownership concentration appears as indeed high and this is affected also by dominant regulatory approaches (media regulation which does not pose restrictions on cross-media ownership and defines the dominant position in media in the same way as in other business sectors). Ownership concentration affects the state of media plurality and social inclusiveness. 'Hybridization' might be identified as another characteristic shaping the developments in the current media ecology. Though two media sectors remain the strongest – that of TV and that of the Internet-based communications – all media industries do not constrain their activities to conventional news channels, but heavily invest into various content integrating actions. This adds another stress to newsrooms and general working conditions of journalists. Ongoing conglomeration is observed in all media sectors, but financially the biggest loser in this trend is the newspaper's industry.

Additional exceptionality of the current media scene in the country is the dominance of the nationwide news media industries. All leading news media are founded and operate in the capital city of Vilnius (where daily politics is being made). Regional media is marginalized. The imbalance is obvious and can be detected also in other aspects, such as working conditions and professionalization of journalists (payment for the journalistic work produced, professional freedom and independence and professional motivation and ambitions of journalists and editors). One notable exception within these trends is the presence of media start-ups financed through crowd-funding actions.

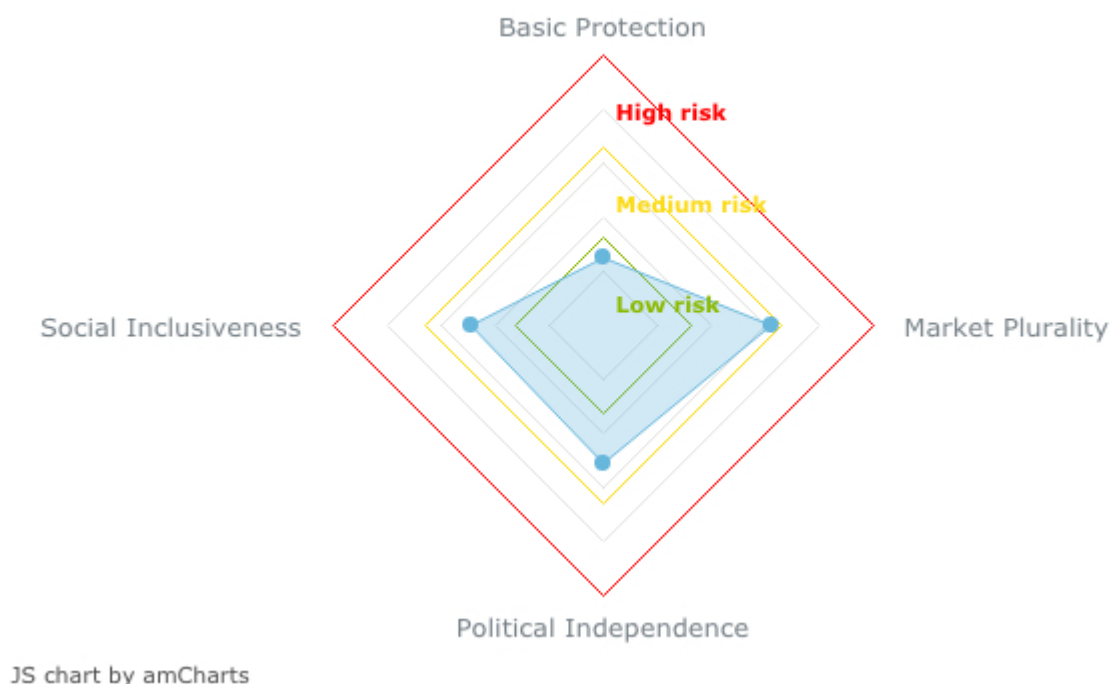
And, lastly, an extra factor determining the state of media functioning in the country is the ongoing political-economic influence. Political and economic constraints as direct pressures on media content and pluralism come both from media owners (and in some media sectors, predominantly in the regional media, these are indeed highly pressing) and editorial offices: 'financialization of journalism' appears to be another serious matter in media business affecting media quality and, hence, diversity and pluralism (Balčytienė et al., 2015; Jastramskis, 2016). Lithuania is a consolidated representative democracy. Ideological and populist clashes are a reality in many contemporary democracies, but the distinctiveness of 'conflictive political culture' in Lithuania lies in the character and specificity of political negotiations, which are shaped and determined by the political winner 'taking all' to meet popular (and quite often also personal) interests and goals. As revealed in the current analysis of risks to media pluralism, political and economic factors remain among the top pressing issues for media functioning in Lithuania. Hence, both (political and economic) weights on media diversity and pluralism cannot be analyzed separately. Both of them are highly interrelated and come 'hand-in-hand': political thinking of elites seems highly determined by the economic factors (Jastramskis, 2011; Balčytienė, 2015; Balčytienė, 2016; Jastramskis, 2019). Such exclusivity is an outcome not only of certain features of multi-party politics in the country but also of the unique timing of societal transformations. In Lithuania, as in other Central and Eastern European countries, transformations have taken place in an economically weak context, thus a continuing political control of economic capital and resources still appears visible (Balčytienė, 2015). This tendency also shapes the political thinking of elites.

Ultimately, close integration of politics and business interests also has a direct impact on the media's institutional standing as well as professional functioning. Lithuanian media operates in economically unsteady conditions that are determined by such factors as the growing uncertainty related to changes in the global economy, the negative outcomes of emigration from the country that distresses both demographic situations and has social and economic impacts, and the persisting presence of political corruption with 'grey zones' economy.



### 3. Results from the data collection: assessment of the risks to media pluralism

#### Lithuania: Media Pluralism Risk Areas



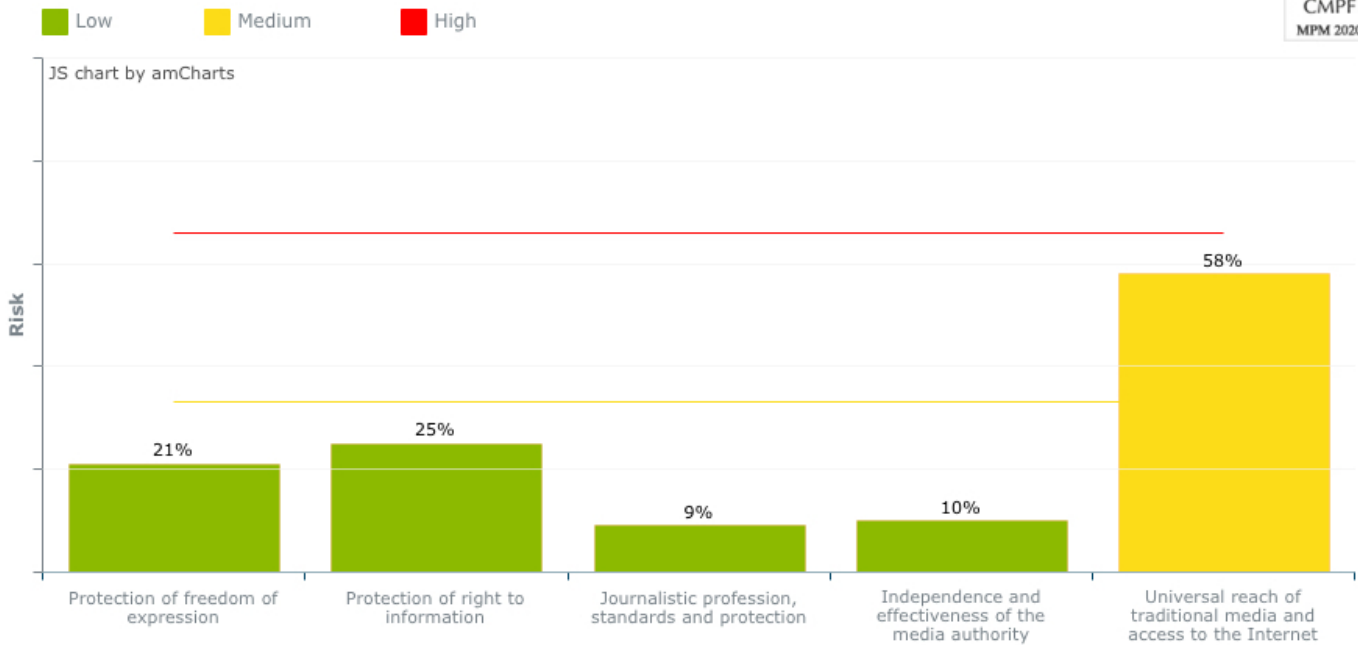
Lithuania does not score high risk in any of the assessed areas. Still, though Basic Protection shows low risk, it is important to stress that in the past year alone there were several politically initiated attempts to make significant changes in this area. Amongst the most evident ones were continuing attempts to impose stricter regulation of PSM management. None of the initiated regulatory shifts were brought into actual changes in the legislation.

Among the most representative societal tendencies identified in the contemporary Lithuanian media marketplace are such deviations, as enduring political and business influence, on-going media ownership concentration, continuing audience fragmentation and social and political polarization, declining overall institutional trust, and rising societal uncertainty and skepticism.

The diagram of risk areas depicts those dominant risks within spheres of political influence, market plurality, and social inclusiveness. Although all these three aspects are identified within the range of medium risk, as will be discussed in the succeeding sections of this country report, neglecting some of the current problems (such as media ownership concentration and continuing influences on media editorial autonomy) might result in the creation of more critical outcomes in the future.

#### 3.1. Basic Protection (25% - low risk)

*The Basic Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have competence to regulate the media sector, and the reach of traditional media and access to the Internet.*



In Lithuania, the overall legal climate for the functioning of media pluralism is quite favourable: the basic rights of **freedom of expression** and **the access to information** are preserved and protected (risks assessed are relatively low, respectively 21% and 25%).

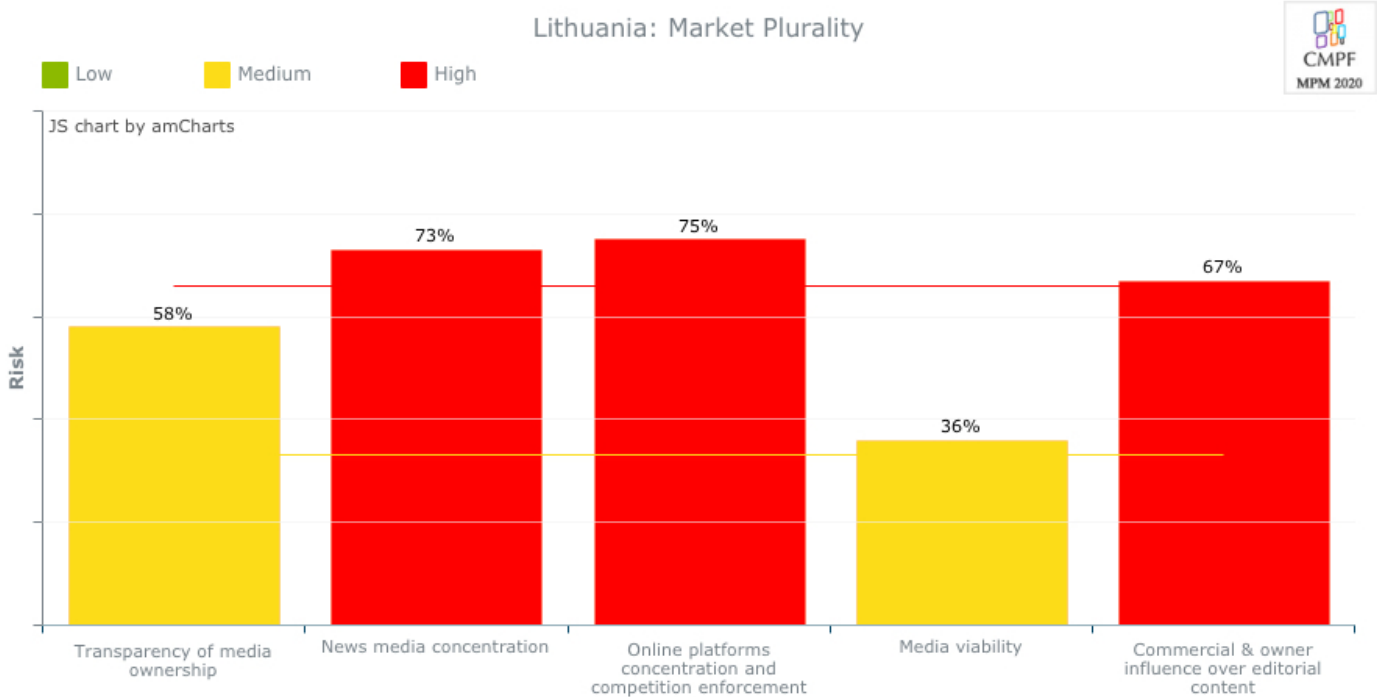
The indicator of **Journalistic profession, standards and protection** indicates low risk (9%), journalistic profession is struggling with growing pressures most of which are determined by specific contextual particularities. Some of these are described as standard (such as economic instability and weakness of the market) whereas other requests (such as perceived lack of public credibility and the need to constantly update their skills) appear as new challenges. Though the overall environment for practicing journalism might seem as rather supportive (for instance, from the point of view of social guarantees), in reality, this is not the case. Media professionals are working in an environment that is highly competitive, economically insecure, professionally vulnerable, and hence is susceptible to professional flaws and corruption. Media organizational factors also contribute to this outcome: the majority of the media organisations have no clear rules regulating the work of journalists and editors; direct accountability of editorial offices is also insufficient as there is no regular practice of having editorial lines clearly declared, nor is there a tradition of having an ombudsman position to deal with consumer complaints. Solidarity among journalists is also weak, and the majority of professional journalists are not members of professional organisations. On the one hand, low membership signals that journalists are striving and mainly concerned with their individualistic professional aspirations (which in the long run lowers journalistic solidarity and might affect the general professional culture in the country). On the other hand, professional organisations are doing little to represent the interests of journalists (which affects any organisational reputation and leads to low membership).

The indicator on **Independence and effectiveness of media authority** is assessed as low risk of 10%. It includes mainly the Radio and TV Commission, Inspector of Journalist Ethics, LRT Council, which act according to the main media laws and regulations and provide with transparent information on their activities. Regular reporting on the main decisions, annual reports and studies are published and available online.

What appears worrisome is the **Universal reach to traditional media and access to the Internet**: the risk is medium of 58%. Despite the technological progress, consistent development of broadband internet and focus on the next generation access (NGA) networks in Lithuania with one of the fastest internet in the EU, intensive digitalisation of the informational space raises significant risks. Disinformation, manipulation, divisive narratives and hate speech are new challenges and rising concerns to the democracies around the world.

### 3.2. Market Plurality (62% - medium risk)

The Market Plurality indicators examine the existence and effectiveness of provisions on transparency of media ownership and the existence and effectiveness of regulation or self-regulation against commercial & owner influence on editorial content. In addition, they assess the risks related to market concentration in the production as well as in distribution of news: as for production, considering separately horizontal concentration in each sector and cross-media concentration; as for distribution, assessing the role of online platforms as gateways to news, the concentration of online advertising market, and the role of competition enforcement and regulatory safeguards in protecting information pluralism. Moreover, they seek to evaluate the viability of the news media market.



News media ownership in Lithuania remains highly concentrated (risk level for **News media concentration** is assessed as high as 73%) with a small number of companies owning the majority of the news media outlets across different sectors. High level of risk of 75% is also generated by the **Online platforms concentration and competition enforcement** in Lithuania. The overall tendency of news media concentration appears indeed challenging and even troubling for a small and steadily decreasing news media market due to worsening demographic situation in the country. Another important indicator of **Commercial and owner influence over editorial content** is demonstrating as high risk as 67%.

**Transparency of media ownership** is assessed as medium risk of 58%. Despite legal safeguards and policy measures to disclose media ownership to the designated authorities (according to the main media law), public information available on the media owners is limited and often outdated. Only few leading news media declare their ownership information on their own websites, as well as only a few of them declare their editorial policies, including PSM group, business daily, few minority and community media.

The indicator on **Media viability** scores a medium risk as well, but at a lower level (36%). This is mainly due to the rising national economy and relatively favorable market and employment trends in different news media sectors, as well as to the positive impact of public support to news media.

One of the most obvious deficiencies observed in the Lithuanian media regulation is the fact that media diversity (and, consequently, pluralism) is not adequately promoted. All major factors – such as definitions of the ‘dominant position’ in the market, or requests to media to disclose, on a yearly basis, media ownership changes – appear to be in place in the existing media regulations; still these arrangements appear to be insufficient to promote adequate and healthy competition in the market.

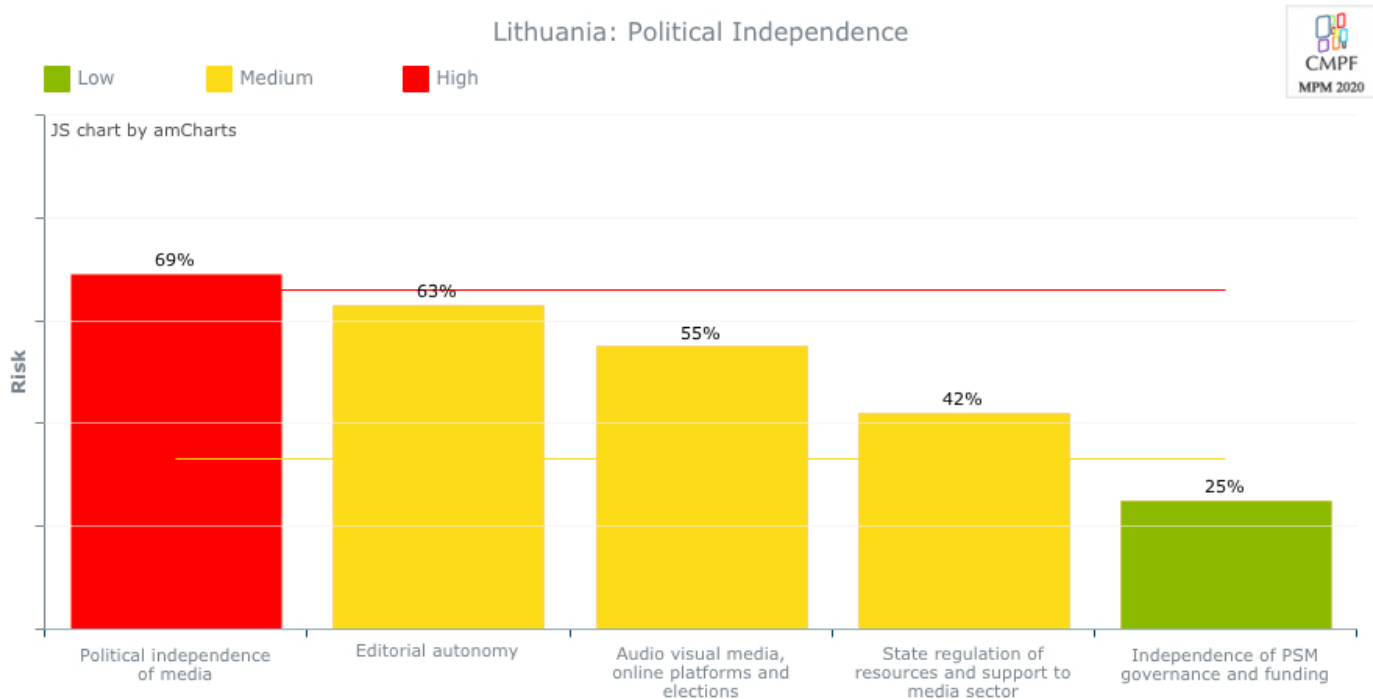
To support media market pluralism, a stronger institutional supervision of largely media business related issues (as well as raising public awareness and interest in media business related matters), and transparency of media ownership appear

to be of exceptional significance. As stated, in most cases, all legal requests appear to be in place, yet their enactment and implementation are generally missing.

All things considered, healthy media competition in Lithuania is missing and is not adequately supported through institutional instruments or through competition regulation. Such structural conditions are leading to a situation favourable for a high level of media ownership concentration in the country.

### 3.3. Political Independence (51% - medium risk)

*The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of public service media. Furthermore, the area concerns with the existence and effectiveness of (self)regulation in ensuring editorial independence and availability of plural political information and viewpoints, in particular during electoral periods.*



The risk levels in the Political Independence area have gone through a number of changes. Some indicators show significant shifts between medium and high assessments of risk.

The issue of indirect political ownership of media remains one of the most sensitive questions in media policy in Lithuania. Political linkages to media ownership prevail especially in local and regional media through subsidiaries with political interests. Lack of media ownership transparency and editorial independence, also relatively weak self-regulatory instruments result in high-risk scoring of the **Political independence of media** (an increase of risk from 56% to 69%).

**Editorial autonomy** is endangered as well, but not to such critical levels as Political independence of media (there is a slight improvement: risk assessment has changed from 75% to 63%). This is due to certain journalistic professionalism initiatives such as the promotion of investigative journalism.

National laws and regulatory safeguards provide political actors with equal conditions for representation during election

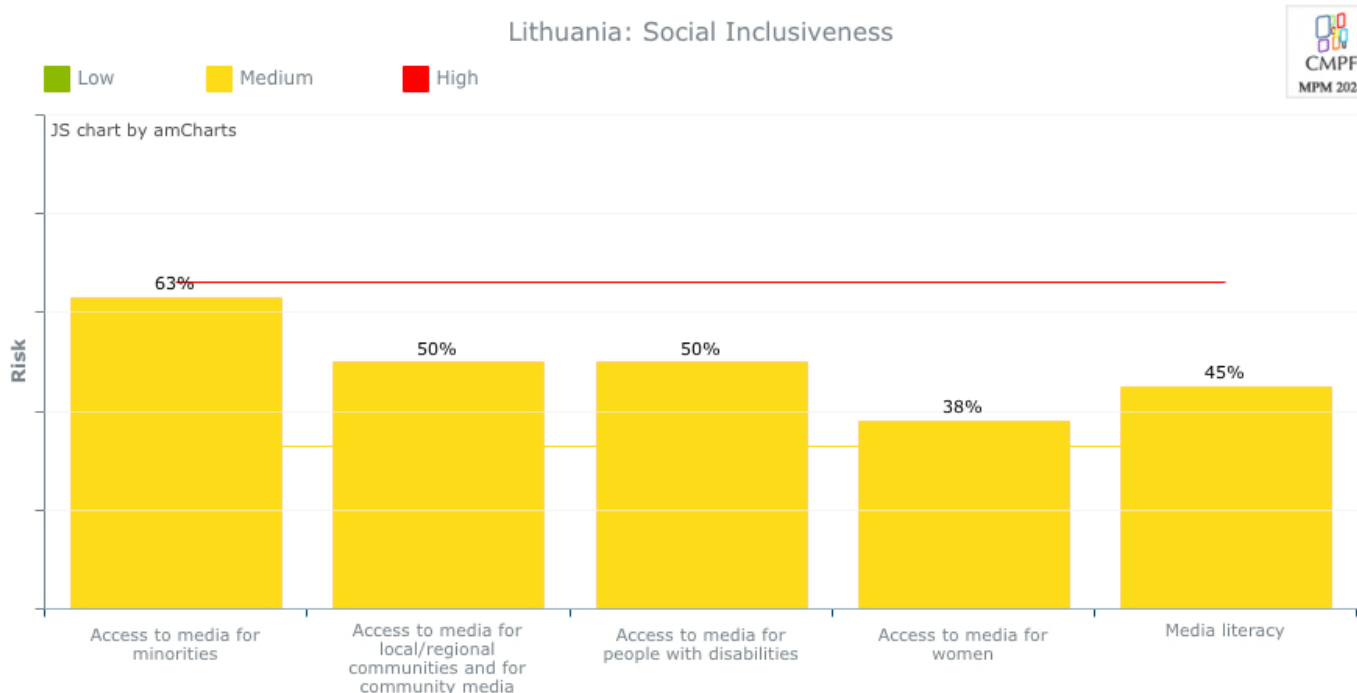
campaigns. However, the reality is more complicated, as more political and economic actors have been using their power to manipulate the media and public opinion. Hence, the indicator on **Audio-visual media, online platforms, and elections** scores a medium risk of 55%. Regulation of political advertising remains an enduring concern.

The indicator on **State regulation of resources and support to the media sector** scores 42%. Due to financial instabilities, the media industry, especially regional and print media are increasingly more dependent on the state and its support, which is not adequate to guarantee media viability and political independence in a longer perspective. In the past year, attempts were made to change the structure of the media support foundation.

The indicator on **Independence of PSM governance and funding** scores the lowest risk within this area (25%). The PSM has acquired a higher level of independence because of the new funding regulations and procedures. PSM linked legislation has enshrined safeguards that ensure its detachment from political interference.

### 3.4. Social Inclusiveness (49% - medium risk)

*The Social Inclusiveness indicators are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country's media literacy environment, as well as the digital skills of the overall population.*



The situation in the area of Social Inclusiveness area is worrisome, especially with regard to the representations of minorities, disabled people, and local/regional communities. On the legal level, regulatory instruments are in place, however, they are not enough to ensure equal opportunities for all in relation to media.

The Area of Social Inclusiveness has gone through dramatic changes in the period from 2017 to 2019.

Though the medium risk is specified in all assessed indicators, especially worrisome continues to be the indicator of **Access to media for minorities** (63% of risk score). In Lithuania, the main media law does specify that minorities have access to airtime on PSM channels (both, TV and radio); still, such policy does not apply to other types of media. Also, in the past year, previously accessible support schemes for minority media production have been undergoing changes.

**Access to media for people with disabilities** appears to be a question of high concern as well (though some improvement is indicated as the score changed from 79% to 50%). The policy on access to media content by people

with disabilities is underdeveloped and there is no legislation in place that requires access services for people with disabilities. In 2019, the PSM has ensured the increase (through subtitling and direct translation of selected news programs) of access to information for people with visual and hearing disabilities.

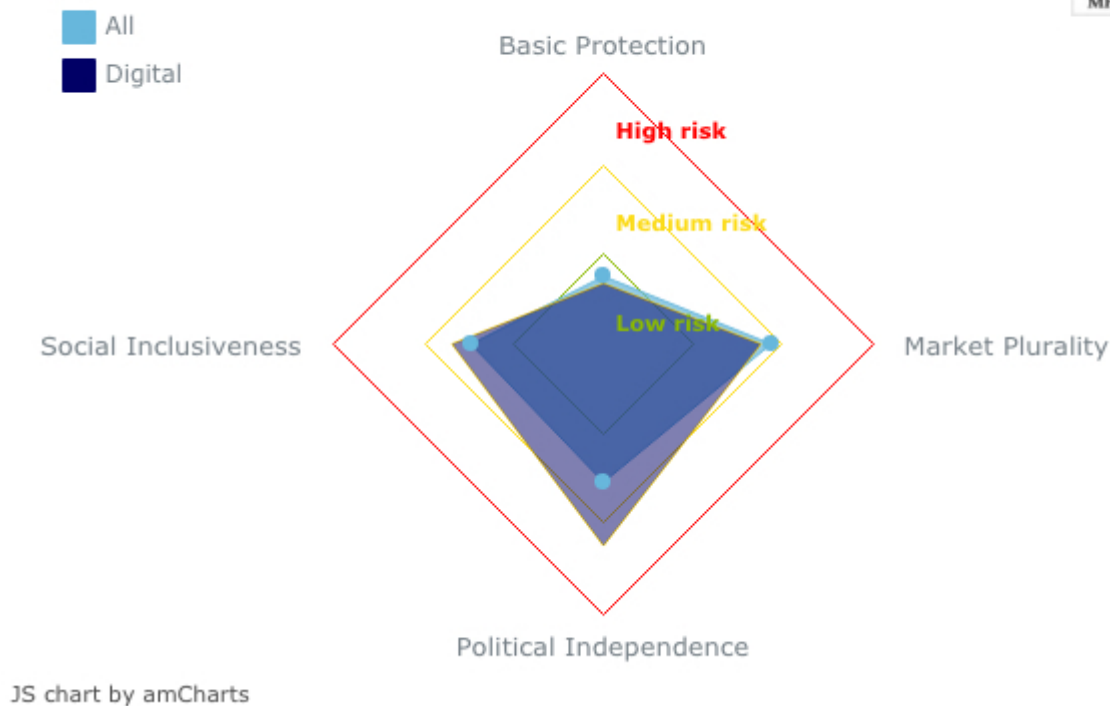
A similar situation is observed in case of **Access to media for local and regional communities and for community media** (medium risk at 50%). This is due to the fact that there are no media-related legal mechanisms that would support and provide access to media for local and/or regional communities and for community media in Lithuania.

An improvement was noticed in the indicator of **Access to media for women** that considerably decreased (risk score changed from 65% to 38%). This result is due to a number of facts. Lithuania is among the countries with the highest representation of women in top media management positions. Also, though there is no explicit media-related policy on gender equality, the PSM has issued a decision to strategically observe the equal representation of genders in its programs.

The **Media literacy** indicator shows a significant increase in risk (from 17% to 45%). Although significant actions were taken in the past year to raise the awareness on media literacy-related matters (by policymakers, media industry, NGOs, public and academic institutions) many of these activities remain strategically uncoordinated. Media literacy has not yet been integrated into formal education (though promises were issued that this should happen by the year 2020).

## 4. Pluralism in the online environment: assessment of the risks

### Lithuania: Media Pluralism Risk Areas - Digital



In Lithuania, generally, the risks to pluralism of digital environment resemble tendency similar to that of risks identified for conventional news media. The only visible exception is the political area that, as happens, reveals a slightly higher probability of risk.

Internet media has long been considered as conventional news media in Lithuania. Internet media outlets adhere to legislative instructions in the same manner as general media. The Law on Provision of the Information to the Public, which is the main media law in the country, offers a very broad definition of media that covers conceptualisations of a book, a newspaper, a magazine, a bulletin or other publication, a television or radio program, a cinema or other audiovisual product, an information agency announcement, also a media product for online distribution. Hence Internet media is considered as conventional media that also obeys to the Code of Ethics, i.e. a self-regulatory instrument that also addresses specificities of communication online. As recent experience of media organisations shows (eg. editorial decisions and actions taken by one of the leading news portals 15min.lt), some of the media have decided to open commentary sections only for identified and registered users. This example shows that editorial policies of the leading Internet media are grounded on well-defined editorial policies and clear definitions of freedom of expression online.

The State is not filtering/removing the web content in an arbitrary way. However, there are media regulatory authorities, including the Lithuanian Radio and Television Commission (LRTK), Inspector of Journalist Ethics, Communications Regulatory Authority (RRT), the National Consumer Rights Protection Authority, the Gaming Control Authority, which are monitoring online communication. There have been a number of cases when the internet sites were blocked on the grounds of violations of copyrighted content and consumer rights. However, there has been no systematic practice of violations of freedom of expression online.

The Directive (EU) 2016/680 was transposed by the national legislation. The new law on personal data protection was adopted by the national parliament in May 2018 and is in force since July 2018. In Lithuania, a new iteration of the Law on Legal Protection of Personal Data (hereinafter - the Law) came into force on 16.7.2018. The Law regulates derogations of the regulation regarding processing of personal code (ID), freedom of expression (journalistic freedom), data processing in employment, the age of a child for consent online, the procedure for imposing fines and the functions of supervisory authorities.

There have been no cases reported in relation to the threats to the digital safety of journalists in Lithuania.

There has been consistent developments in the provision of broadband Internet services in Lithuania and focus on the next generation access (NGA) technologies. The overall broadband coverage reached 99.7% of households across the country in 2018, which is slightly below the EU average of 99.9% (Broadband Coverage in Europe 2018, 2019). NGA broadband technologies increased by 8.3% and reached 62.7% in availability, but remained accessible to less than a third of rural households (27.5%) (ibid.).

The Internet market concentration has been growing in Lithuania with 76.8% of shares taken by top 4 ISPs, including Telia Lietuva, Cgates, Init, Splius (Lithuanian Communications Sector Report 2017, 2018). Telia Lietuva was the major provider of retail internet access services via fixed communications technologies (FTTx) and metallic twisted pair loops using xDSL lines (xDSL technology), respectively 46.7% and 99.3% of all internet access service users across country.

To ensure non-discriminatory and quality Internet access services, the network traffic is being monitored by the Communications Regulatory Authority of the Republic of Lithuania (RRT). The main tools include monitoring of mobile Internet access services and online speed measurement tool provided for all end-users. An online speed measurement tool <http://matuok.lt/> is available for all end-users to check their actual Internet access speed and compare it to the values stated in the contract with the ISP.

Lithuanians consume media content for about 7 hours a day (Kantar Media Day, 2019), of which almost an hour is spent in using multiple channels (multitasking). Social networks, generally, account for the lion's share of the time dedicated for spending on the Internet (37 percent); the other time is spent on such activities as video content consumption and Internet search (about 22 percent each), and news portals reach (19 percent).

Lithuanians continue to lead the EU rankings of online news consumption (DESI 2019). Often, users reach out to online news media channels via direct access. In 2018, the difference in monthly audience reach between the two most popular news portals in Lithuania was virtually gone. Both 15min.lt and Delfi.lt are read by over 1.2 million of users (in time of measurement, the difference between the two portals was only about 10 thousand of users). Such data suggests that direct access via smart phones (apps) dominates in Lithuania.

In 2017, more than 1.4 million people used Facebook in Lithuania. Facebook (97% of social network users) and YouTube (94%) are the top accessed social media and these remained unchanged over the last years. According to 2019 data, the number of Facebook users in Lithuania is estimated close to 2 mln.

Media freedom monitoring analyses and research studies show that there is a lack of autonomy, transparency, and impartiality in the Lithuanian media newsrooms due to strong financial and market pressures. In the same manner, as for the ownership transparency in the traditional media sector, still there is room for improvement in this area, and one important improvement would be an enacted requirement for media owners to declare their interests. In fact, media companies in Lithuania are legally obliged to provide a yearly report on the changes in their ownership structures (this is clearly listed in the law indicating that as small changes as of 10% must be submitted to the designated authority - see explanations provided above); however, only a few media outlets disclose the data as no sanctions are imposed if media do not comply with this legal regulation. Nongovernmental organizations (predominantly the Transparency International) have repeatedly taken initiative in public disclosure of linkages between media companies and business ownership structures.

Political control over native digital media outlets appears of slightly higher risk, and this trend goes in the same line as with political influences on conventional news media. There is a dominant trend that persists in the so-called general practice of 'media dependency' in the country, which, as a matter of fact, might be described as altered towards greater independence of those online outlets that are financially stronger. Still, these moves are not sufficient to make a statement that digital native media experiences fewer political or market pressures than conventional media companies.

In the recent years there have been initiated various initiatives and analysis projects that apply media education and media literacy training approaches and perspectives to counteract hate speech in both online and offline communications. Very often, these initiatives also go in line with a much broader frame of cybersecurity analyses and projects how to combat disinformation and misinformation campaigns online and offline. Incentives come from a wide spectrum of national and international NGOs based in Lithuania (Media4Change, Vilnius Political Analysis Institute, Human Rights Institute, cybersecurity centers), international bodies initiating different projects (The Nordic Council of



Ministers, The British Council, Embassy of the United States, Embassy of Sweden), national bodies and institutions (Ministries of Culture, Science and Education, Internal Affairs, Defense, Foreign Affairs, and other governmental organizations), academic institutions (Vytautas Magnus University, Vilnius University). Also there have been a couple of fact-checking initiatives initiated by media groups. In 2018, Delfi.lt, the leading online news media, introduced DEBUNK ('demaskuok' in Lithuanian) project, a special platform for investigative journalism, which helps to detect fake news and reduce its harmful impact for the society. The innovative tool allows debunking fake news permanently and stop spreading them out. In the long-term perspective, the project aims at raising public awareness on disinformation techniques and fake news phenomenon, society's ability to think critically, and development of the high-quality news industry. A similar project is also run by another online news media 15min.lt. Still, the critical side from all these initiatives is linked with assessments: little factual data is available on the effectiveness of those varied initiatives (still, judging from the media discourse discussing different cases, also complaints addressed to the inspector of journalists' ethics and other media authorities, there is a steady improvement).

## 5. Conclusions

Generally, the Lithuanian media system seems to be fairly pluralistic, but there are certain topics that require closer attention and informed analysis. Among identified risks, a number of tendencies were listed that have an enduring cultural character, such as the closeness of political-business relations. As shown, there are legal safeguards guaranteeing media-independent functioning, still, lack of empirical data and analysis complicates the assessment of how serious these identified risks are. As illustrated with the PSM case, political efforts to impose stricter regulation on media might eventually end up with real threats and not only enduring problems.

Though freedom of speech and expression is adequately taken into the account into the legislation, conditions for media pluralism and diversity in Lithuania are highly dependent on such factors as the size of the market as well as specificities of politico-economic context and media culture.

Highest threats are indicated in the spheres of media ownership concentration and editorial independence from (politico-business) influences.

Three areas of policy improvement require special attention: **Media accessibility.** As appears, small niche audiences are still underserved in Lithuania. Also, greater media social responsibility and openness need to be initiated here. Media 'social inclusiveness' needs to be further strengthened by taking into account the rights and information needs as well as media literacy competencies of different groups of citizens (women, people with disabilities, children and adolescents, elders, minority groups). **Media production.** Within this action, questions linked with media financial support mechanisms and production diversity must be assessed (VAT, as well as a general media support system, need to be reviewed here). **Media professionalism.** In addition to the classical understanding of media professionalism, issues linked with audience responsiveness and media education (MIL) appear significant here.

To conclude, the issue of media diversity and pluralism appears among the top matters and concerns in public policies linked with technological connectivity and information accessibility, content production and quality assurance, and information dissemination and communication. Lithuania has a newly affirmed media policy document that was approved by the Ministry of Culture in 2018 where five strategically significant areas are listed. Among those indicated are issues related to the strengthening of the position of the Ministry in the coordination of actions and responsibilities in the media field, matters focusing on greater media independence and accountability, content diversity and quality, and media and information literacy. One year (2019) appears too short period to assess whether these strategically significant goals have had an effect on the shaping of new communication ecology in the country.

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## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Aukse	Balcytiene		Vytautas Magnus University	X
Kristina	Juraite		Vytautas Magnus University	

## ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
Deividas	Velkas	Head of Unit	Ministry of Culture, Republic of Lithuania
Deimantas	Jastarmskis	Associate Professor, media analyst and commentator	Vilnius University
Dzina	Donauskaite	Director	Lithuanian Journalism Centre
Virginijus	Valentinavicius	Associate Professor, media analyst and commentator	Mykolas Riomeris University
Mantas	Martisius	Chairman	Radio and Television Commission, Republic of Lithuania
Audrone	Nugaraite	Vice-Chair	Lithuanian Journalists Union
Andrius	Vaisnys	Professor, media analyst and commentator	Vilnius University

