

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

Application of the Media Pluralism Monitor In the European Member
States and in Candidate Countries in 2023

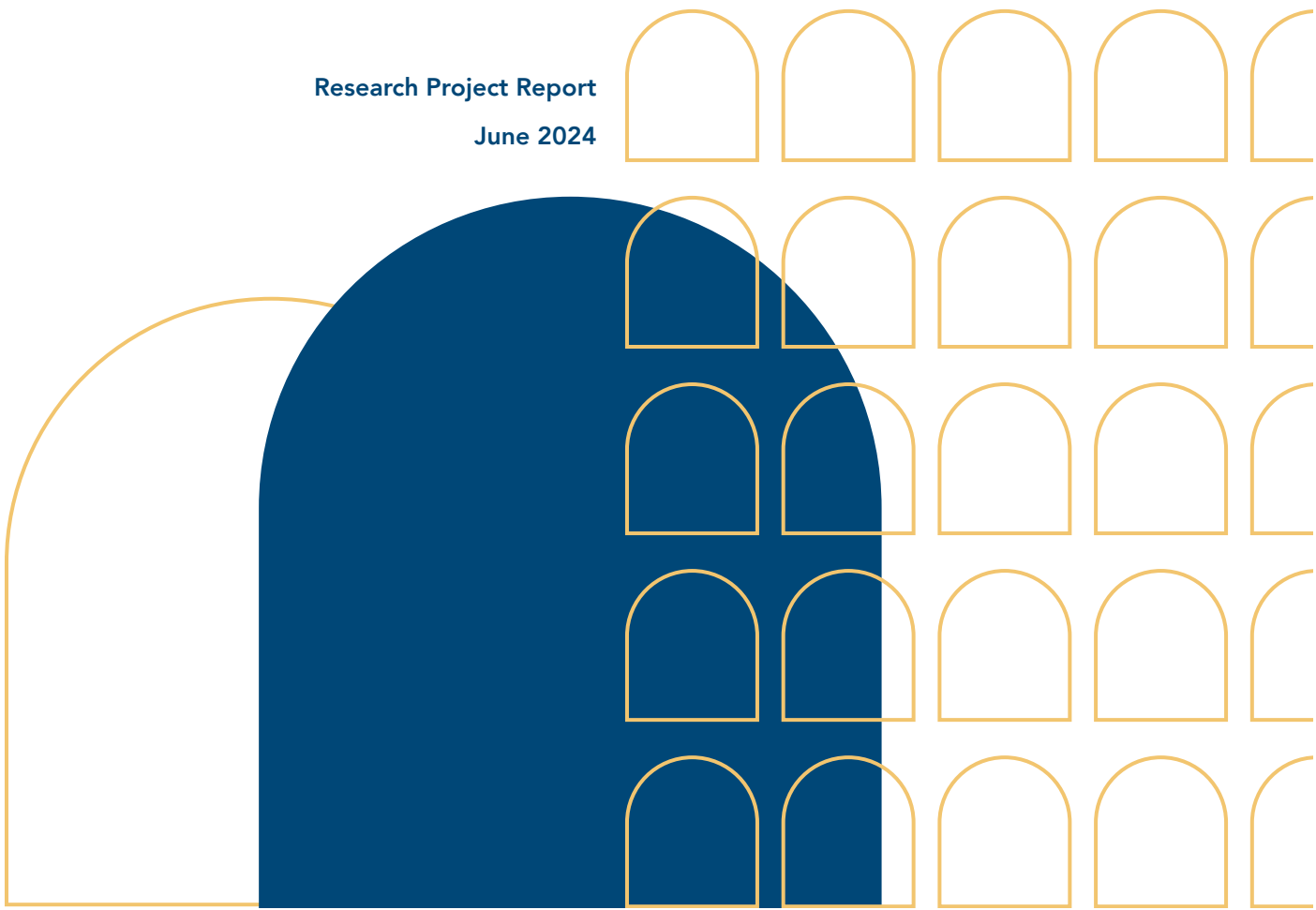
Centre for Media Pluralism and Media Freedom

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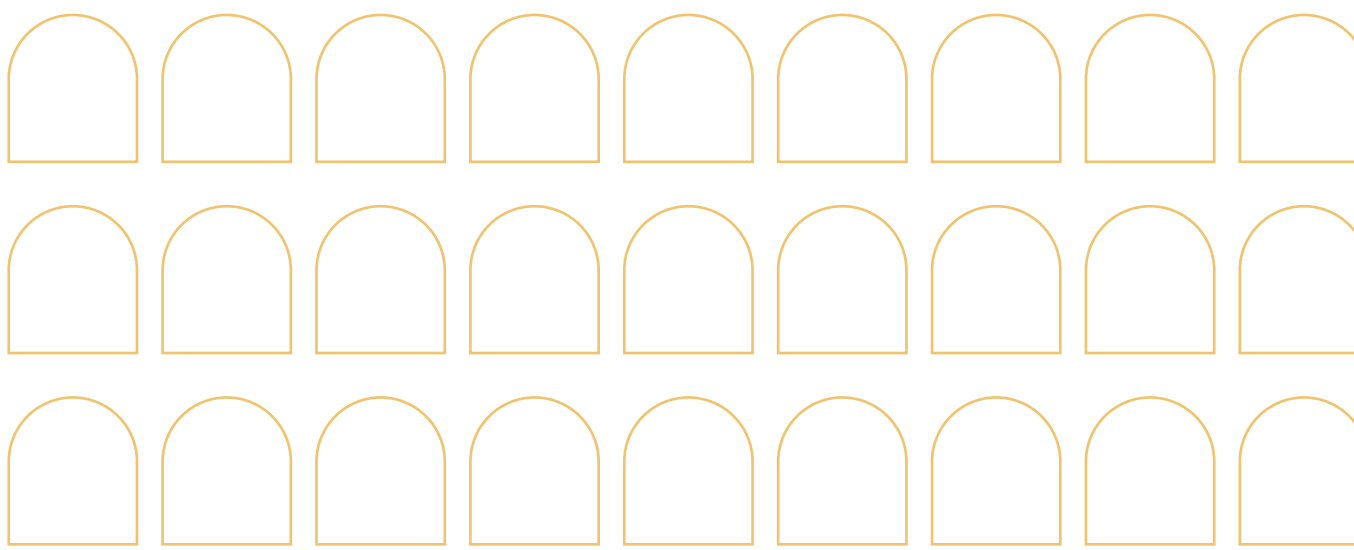
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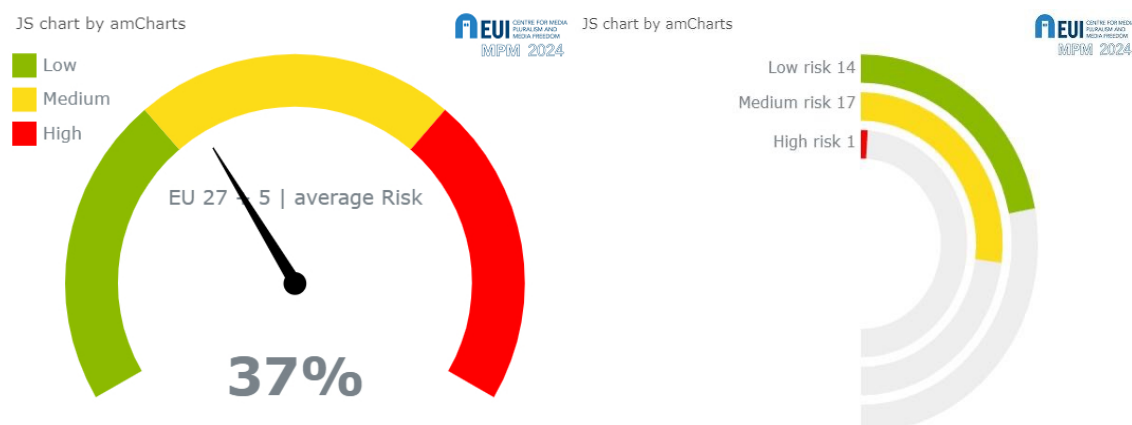
1. EXECUTIVE SUMMARY

This report presents the results and the methodology of the Media Pluralism Monitor 2024, based on its implementation in 32 countries (27 EU Member States and five candidate countries) for the year 2023. The Media Pluralism Monitor (MPM) is a tool that is geared to assessing the risks to media pluralism in both EU Member States and in candidate countries. Since 2013/2014, it has been implemented on a regular basis by the Centre for Media Pluralism and Media Freedom, and on a yearly basis since 2020. This tool is based on a holistic perspective, taking into account the legal, political, and economic variables that are relevant in analysing the levels of plurality in media systems in a democratic society.

Fundamental Protection

The **Fundamental protection** area of the MPM analyses the requirements for media pluralism and freedom, the existence of effective regulatory safeguards to protect freedom of expression and the right to seek, receive and impart information; favourable conditions for free and independent journalism (in terms of both working conditions and safety of journalists from physical, verbal and legal harassment); the presence of independent and effective media authorities; and the universal access to both traditional media and access to the internet. The area also focuses on the challenges to the plurality of the media landscape that are posed by the specificities of the online environment. The MPM thus also assesses the protection of freedom of expression online, online data protection, the safety of journalists online, the levels of internet connectivity, and the implementation of European net neutrality obligations.

Figures 1.a. and 1.b. – Fundamental Protection – risk level



The analysis of MPM2024's results in the **Fundamental protection** area indicates that, in the EU and candidate countries, the average risk for this area is slowly increasing: it is assessed as being at 37%, three percentage points more than last year and four more than in MPM2022, in the medium-risk band.

In the **Fundamental Protection** area:

- 14 countries scored as being at low risk: Austria, Belgium, Denmark, Estonia, Finland, Germany, Ireland, Lithuania, Luxembourg, Portugal, Slovakia, Sweden, the Czech Republic, and the Netherlands.
- 17 countries scored as being at medium-risk: Albania, Bulgaria, Croatia, Cyprus, France, Greece, Hungary, Italy, Latvia, Malta, Montenegro, Poland, Romania, Serbia, Slovenia, Spain and the Republic of North Macedonia. Six of them shifted from the low to the medium-risk band, namely: Cyprus, France, Italy, Latvia, Malta, and the Republic of North Macedonia.
- Turkey scored high risk, as in the last three years of MPM implementation.

The indicator **Protection of freedom of expression** scored as being at medium-risk (35%), close to low risk. Some of the main issues remain unsolved, namely the ongoing lack of decriminalisation of defamation, and the continuous lack of transparency of online platforms' blocks, removals, and filtering of content. Moreover, in virtually all the countries under analysis, the constitutional framework guarantees freedom of expression; however, in practice, this fundamental right is not always enjoyed freely.

The Indicator, **Protection of the right to information** (42%) scored as a medium-risk. In 2023, some important developments occurred at the EU level in this area, as most of the EU countries—Estonia and Poland excluded—transposed the 2019 EU Whistleblowing Directive.

The countries scoring a high risk with regard to this sub-indicator are those where even if legal frameworks to guarantee access to public documents are in place, they are not really effective in practice. The MPM2023 reported a significant deterioration in access to information brought about by the judgement of the EU Court of Justice by its suspension of public access to beneficial ownership registries on the basis of their interference with the rights to privacy and personal data protection under the EU Charter of Fundamental Rights. As an attempt to balance the equilibrium of rights, the proposed 6th EU Anti-Money Laundering Directive—for which the Council and Parliament reached a provisional agreement in January 2024—introduces the obligation to demonstrate a “legitimate interest” in this context, thus granting special rights to access information to the press and civil society.

Journalistic profession, standards and protection (43%) also scored as being at medium-risk, as in MPM2023. Overall, the sub-indicator posing the higher risk is that related to journalists’ digital safety (69%). In general, the digital dimension registers a higher risk for all the sub-indicators, e.g. regarding journalists’ working conditions online. With regard to journalists’ physical safety, worrying events took place in Turkey, Spain, and the Netherlands, including physical attacks and arrests of journalists, as will be better outlined later in this report. Poor working conditions in some of the countries assessed persisted, and the low popularity of journalistic associations has made bargaining for better working conditions even more difficult.

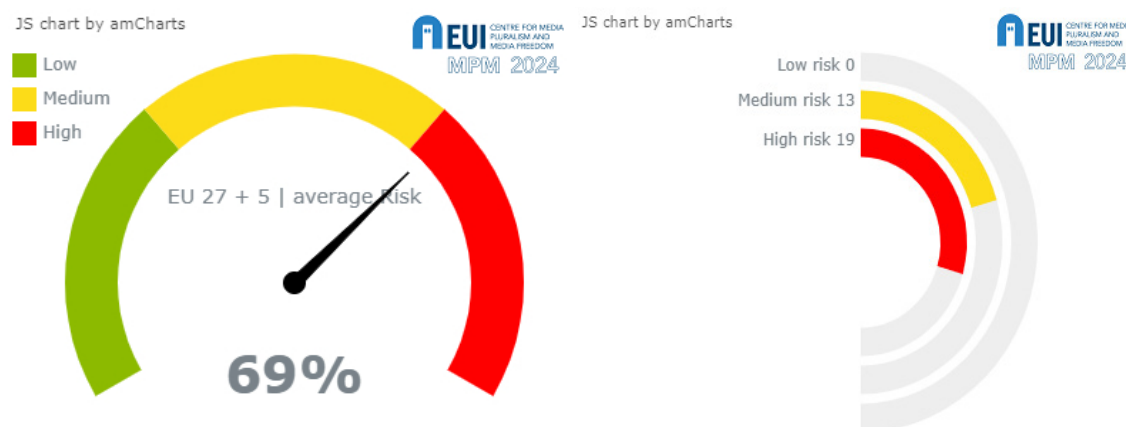
The indicator **Independence and effectiveness of the media authority** was the only one to remain in the low-risk band. However, in addition to Hungary, also Poland, Turkey, and Greece entered the high-risk band. Greece’s risk score skyrocketed with a 20% increase, mainly because the board’s appointment of the main media authority—the National Council for Radio and Television’s (ESR)—was deemed illegitimate. The Competencies sub-indicator scored better, with most countries falling within the low-risk band. Nonetheless, challenges persist, particularly in countries like Turkey, where authorities wield sanctioning powers to stifle critical voices. Budgetary pressures are another concern, with some countries facing medium to high-risk levels due to inadequate funding for their regulatory bodies.

The aggregate risk score for the indicator **Universal reach of traditional media and access to the internet** was 41% in MPM2024. However, it should be noted that differences in the risk score compared to MPM2023 are mainly attributable to methodological changes. Indeed, substantive shifts in the risk level were confined to the sub-indicators for which there were data source changes, namely those pertaining to broadband coverage and internet access. Overall, there was a slight increase in the percentage of households with broadband coverage and internet access detected across the countries under assessment.

Market Plurality

The **Market Plurality** area considers the economic dimension of media pluralism. Healthy, competitive, and open media markets favour external pluralism and the potential flourishing of a diverse media offer, whereas transparency of ownership and editorial independence protect the integrity of newsrooms and of the media, and the right of their recipients to have access to correct and independent information. The Market Plurality area assesses the risks resulting from opacity of media ownership, from the concentration of the market, in terms of both production (media service providers) and distribution (digital intermediaries), from the economic sustainability of the media, and from the influence of commercial interests and ownership on editorial content.

Figures 1.c. and 1.d. Market Plurality - risk level



The **Market Plurality** area scores at high risk at 69%, the same level registered in the MPM2023. A comparison with previous years shows that the risk level of the market area has always been the highest across all the areas of the Monitor; it shifted to the high-risk zone during the COVID-19 pandemic, in MPM2021; it improved slightly in MPM2022 (66%); then it returned to the high-risk zone in MPM2023, and remained there in the current implementation. As in the past, the main risks in this area derive from the concentration of media ownership and the concentration in the digital markets, which threaten the pluralism of offer and pluralism of exposure, respectively. In the year of the assessment, a worsening trend is reported for the economic sustainability of the media industry, together with increased risks for editorial independence from commercial and owners influence.

In the **Market Plurality** area:

- no country is at low risk.
- 13 countries are at medium-risk: Austria, Belgium, Denmark, France, Germany, Greece, Italy, Latvia, Luxembourg, Portugal, Slovakia, Sweden, and the Netherlands.
- 19 countries are at high risk: Albania, Bulgaria, Croatia, Cyprus, Estonia, Finland, Hungary, Ireland, Lithuania, Malta, Montenegro, Poland, Romania, Serbia, Slovenia, Spain, the Czech Republic, the Republic of North Macedonia, and Turkey.

In comparison with the MPM2023, four countries shifted from high to medium-risk (Austria, Belgium, Greece, and Slovakia); conversely, two countries shifted from medium to high risk (Croatia and the Republic of North Macedonia). In evaluating the results, it must be taken into consideration that in the **Market Plurality** area, the differences in the risk level, from a quantitative point of view, are not strong, as the majority of the countries score between 60% and 70%.

The main findings of this edition in the area of **Market Plurality** are the following:

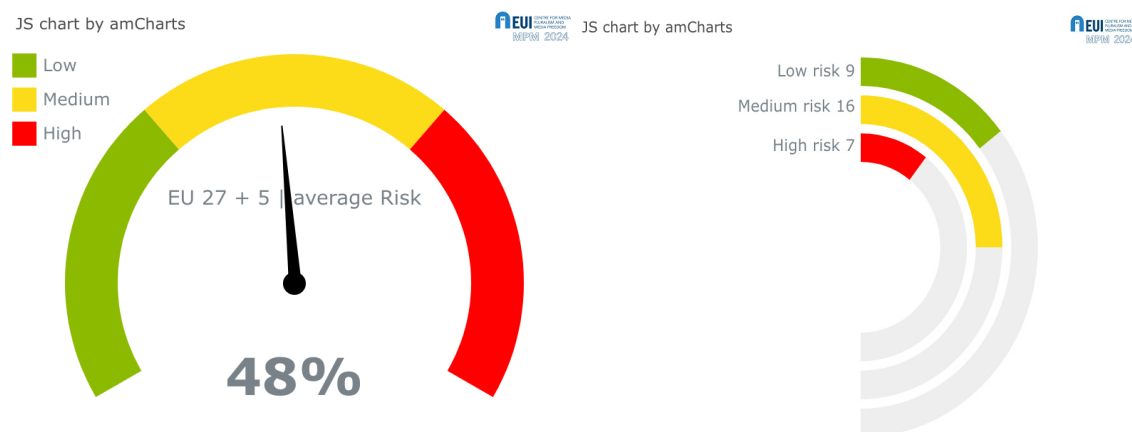
- Three indicators are at high risk, namely: **Plurality of media providers**, **Plurality in digital markets**, and **Editorial independence from commercial and owners influence**. The remaining two indicators, **Transparency of media ownership** and **Media viability**, are at medium-risk.
- The indicator on **Transparency of media ownership** scores 51%, one percentage point below last year's score. Progress in this indicator is related to new regulations at the EU and at the national level. However, high risk remains in nine countries. In addition, it should be highlighted that in the digital environment of the media this indicator performs worse, in particular when it comes to the transparency of ultimate ownership online.
- The indicator with the highest level of risk is **Plurality in digital markets** (82%), which overtook, in MPM2024, the indicator on **Plurality of media providers** (80%), signalling that, in the digital environment of the media, the concentration of the digital gatekeepers distributing the news is even higher than the concentration of the media owners. In this regard, the last year has been characterised by a continuous trend towards mergers and the consolidation of the media industry; by increased dominance in the advertising market by the digital intermediaries; and by discontinuous attempts of negotiations between platforms and media regarding accessibility, and remuneration of the content.

- The indicator on **Media viability** is at 62%, with a small increase of the risk level. In a year still marked by inflation and low growth, the media revenue trends did not recover, except for some cases in the digital realm. Together with the long-lasting decline in the newspapers sector, this edition of the MPM highlights the deep crisis in the economic sustainability of local media. Innovative practices and models are still not enough to counterbalance the crisis of the traditional models. The sub-indicator of employment shows, on average, high risk.
- The indicator on **Editorial independence from commercial and owners influence** shifted to high risk (68%) for the first time in the history of the MPM implementation. This is due to the lack of effective legal or self-regulatory safeguards to protect the integrity of editorial content, in line with international and European Union standards; and to the deteriorating economic conditions that increase vulnerability of the newsrooms to the pressure of non-editorial interests, including the interests of their owners who often have stakes in multiple sectors of the economy.

Political Independence

The area of **Political Independence** is designed to evaluate the risks of the politicisation of media ownership, political influences in editorial autonomy, political interference with the public service media, and the politicisation of the distribution of state managed resources to the media. The area also concerns the role and regulation of both the audiovisual media and online platforms, especially during election campaigns. Political pluralism in the media enables the representation of diverse political perspectives, ensuring that citizens have the opportunity to engage with a broad range of ideas and ideologies. By encompassing various viewpoints within the political spectrum, political pluralism promotes inclusivity, encourages public discourse, and enables individuals to make informed decisions in the democratic process.

Figures.1 e .and.1 f - .Political Independence - risk level



The **Political Independence** area continues to show a medium-risk (48%), which is in line with the most recent implementations of the MPM (MPM2023, 48%; MPM2022, 49%; MPM2021, 48%; MPM2020, 47%). Nine countries present low-risk results, sixteen score a medium-risk level, and seven indicate high-risk levels for **Political Independence**: Albania, Malta, Hungary, Montenegro, Romania, Serbia, and Turkey.

All five indicators investigated in the area demonstrate medium-risk levels, when considering the overall aggregate. Once again, the indicator **Editorial autonomy** is the one presenting the most concerning results. However, when the EU-27 alone are considered, the indicators **Audiovisual media, online platforms, and elections**, and **State regulation of resources and support to the media sector** ranked in the low-risk band (its highest margin, very close to the medium-risk zone).

Considering the overall aggregate score, three out of five indicators had increased risks (**Political independence of the media, Editorial autonomy, Independence of public service media**). One indicator remained stable (**State regulation of resources and support to the media sector**), and one decreased by one percentage point (**Audiovisual media, online platforms and elections**). In terms of the geographical distribution of risk, it is confirmed that the highest levels of political capture of the media are largely concentrated in Central and Southeastern Europe, although significant evidence of political control is found across the whole Old Continent, with minor risks only for Northern Europe.

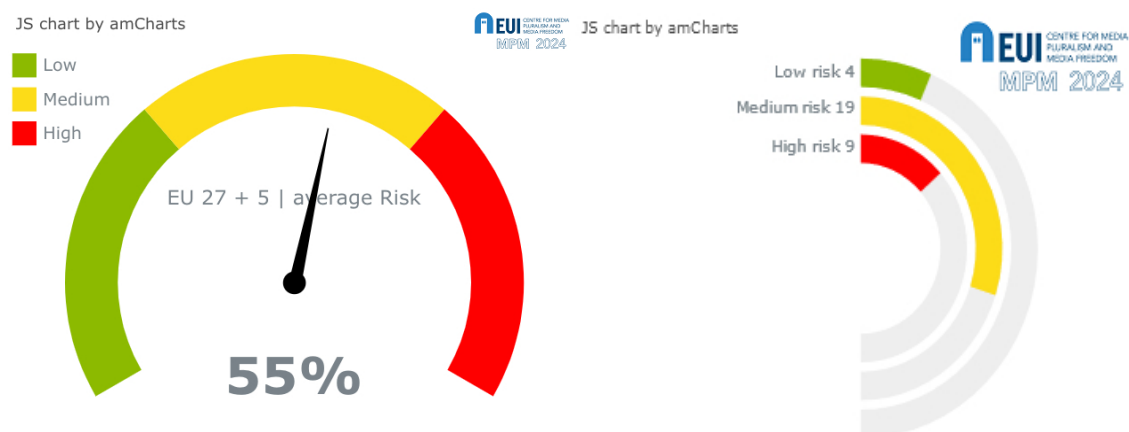
- The average risk for the indicator **Political independence of the media** is 55%, placing it in the medium-risk band. The indicator scored a one percentage point increase, when considering the overall aggregate result. Within the indicator, the sub-indicator *Political control over media outlets* remains the highest scoring one (61%), followed by *Conflict of interest* (53%) and *Political control over news agencies* (48%). All three sub-indicators fall within the medium-risk band. These results confirm the newspapers as the sector most affected by significant levels of capture through direct and/or indirect ownership means. Save for digital native media, all other media sectors showed increased risks.
- The indicator **Editorial autonomy** presents a medium-risk of 61%, remaining the worst score of the five indicators found in the Political Independence area. The drivers of the risk increase are identified within the sub-indicator *Effectiveness of self-regulation*, which was subjected to a three percentage points deterioration. At the same time, the highest scoring sub-indicator, in this context, remains *Appointment of editor-in-chief*. Consistent with the previous year, it presented an overall high-risk of 68%, reflecting the absence of common regulatory safeguards preventing political influence over the appointments and dismissals of editors-in-chief in most of the countries under analysis. The practice indicates significant concerns as well.

- On average, the indicator **Audiovisual media, online platforms and elections** results in the lowest risk score of the five indicators found in this area (35%). The legal reality and practice investigated through the sub-indicator *Rules on political advertising online* remains the major concern in this sub domain (61%, medium-risk). In the audiovisual media, the risk related to political advertising is significantly lower (15%). As for the access and fair representation of different political actors and viewpoints, the average risk is higher for private audiovisual media (*Commercial audiovisual media bias*, medium-risk, 37%) than in PSM (*PSM bias*, low risk, 29%).
- The **State regulation of resources and support to the media sector** indicator scores a medium-risk of 37% this year, stable compared to the previous assessment. However, when the EU-27 aggregate is considered, a one percentage point improvement marked the passage from the medium, to the low-risk band (33%). Most of the countries present low-risk scores. The main driver of risk is still represented by the sub-indicator *Distribution of state advertising* (76%). Most of the countries present high risks within this sub-indicator, with concerns being detected both in terms of availability and quality of the criteria for the distribution, and the actual practice.
- The indicator **Independence of public service media** presents a medium-risk of 53%, which is stable when compared with the previous MPM round. Almost half of the countries assessed present high-risk results under the sub-indicator *PSM Governance*, which scores an overall medium-risk of 52%, representing a slight increase. Once again, the analysis locates most of the concerns in the Central and Southeastern European region. As for the sub-indicator *PSM funding*, it remained stable an increased risk by one percentage point.

Social Inclusiveness

The **Social Inclusiveness** area is designed to evaluate the representation in the media, both in terms of media production and media content, of diverse groups, including cultural, ethnic and linguistic minorities, media accessibility for people with disabilities, local and regional communities, and women. It also includes media literacy, as a precondition to inclusiveness and protection against disinformation and hate speech, as a safe media environment is the key to inclusiveness.

Figures 1.g. and 1.h. - Social Inclusiveness - risk level



The **Social Inclusiveness** area, with a risk assessed at 55% (+1pp compared to the MPM2023), remains in the medium-risk range. When taking into account EU Member States only, the risk level decreases to 52%, placing it in the medium-risk band. However, when taking into account only candidate countries (5 countries), the risk level increases to 71%, shifting it to the high-risk band.

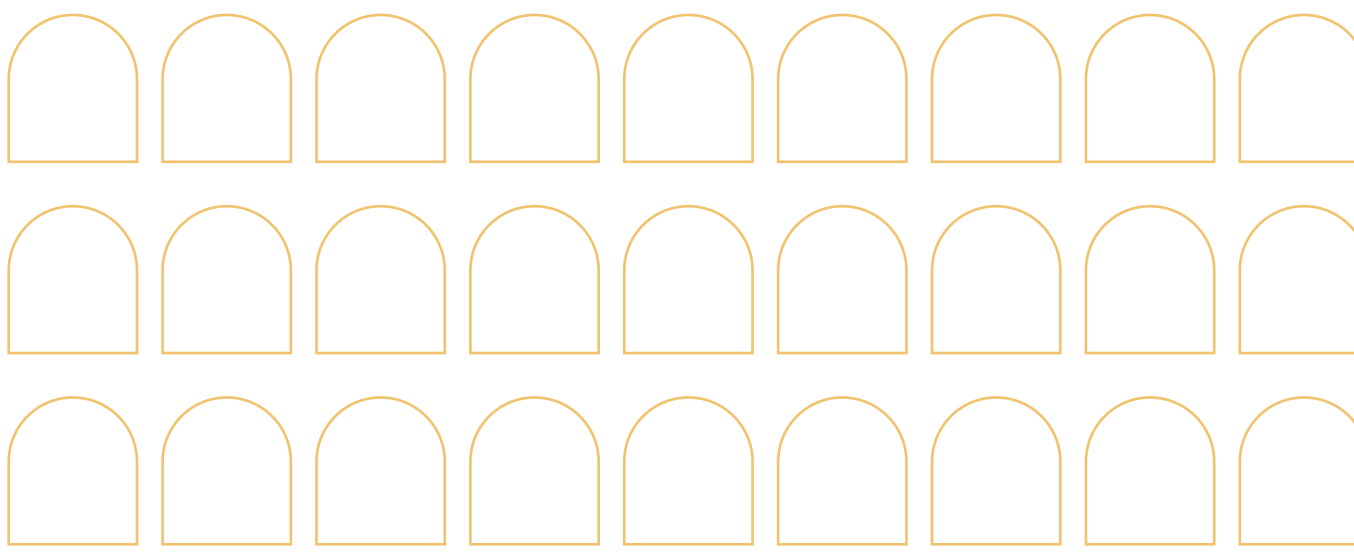
Of the 32 countries studied in this edition:

- Four countries score in the low-risk band: Denmark, France, Lithuania, the Netherlands, and Sweden.
- 19 countries score in the medium-risk band: Austria, Belgium, Croatia, the Czech Republic, Estonia, Finland, Germany, Greece, Ireland, Italy, Latvia, Lithuania, Luxembourg, the Republic of North Macedonia, Poland, Portugal, Slovakia, Spain, and Slovenia.
- Nine countries are associated with a high risk: Albania, Bulgaria, Cyprus, Hungary, Malta, Montenegro, Romania, Serbia, and Turkey.

The main findings for this new edition are the following:

- All the indicators for the area score within the medium-risk band. There is no change compared to last year.
- **Gender equality in the media remains the most problematic indicator in this area**, in line with the findings of the previous editions of the MPM. This indicator remains, with an average risk score of 64%, the fourth highest scoring indicator in the whole report, following three indicators of the Market Plurality area: Plurality in digital markets (82%), Plurality of media providers (80%), and Editorial independence from commercial and owners influence (69%). The main issue remains the representation of women, which is often limited and/or stereotypical.

- The **Representation of minorities in the media** remains unsatisfactory in most countries, especially in private commercial media, despite some positive efforts being taken in Member States. Public service media tend to lack diversity charters to promote the representation of marginalised communities. However, media accessibility for people with disabilities has improved in some countries, due to the use of AI tools.
- The indicator **Local, regional and community media** presents the highest increase in risk for the area. The existence of news deserts in many countries contributed to increasing the risk level for this indicator. The other main factor of risk for this indicator is the absence of legal definition of community media in half of the countries studied.
- The **Protection against disinformation and hate speech** remains underdeveloped in most countries. Regarding the fight against disinformation, there are a lot of individual initiatives, yet most countries do not have a comprehensive and long-term strategy to fight disinformation. Among these individual and stand-alone initiatives, useful fact-checking projects with high ethical standards, have emerged over the past years in many countries.
- A similar trend is observed in the field of **Media literacy**. The multiple individual initiatives often fail to compensate for the lack of a comprehensive and up-to-date strategy at the national level. However, awareness regarding the need for strong media literacy seems to increase, triggered by the necessity to conduct a strategic fight against disinformation.



2. INTRODUCTION

The Media Pluralism Monitor (MPM) is a diagnostic tool developed by the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute. It evaluates the potential risks to media pluralism within a specific country while providing a comparative analysis across them. The MPM utilises 20 indicators designed to analyse four key dimensions of media pluralism: **Fundamental protection**, **Market plurality**, **Political independence**, and **Social inclusiveness**. Designed with a normative approach, the MPM aims to identify a range of factors and conditions that could jeopardise media pluralism, including lack of or inadequate legal protections, media market concentration, and socio-political challenges within the media and information landscape.

The primary goal of the MPM is to assess potential vulnerabilities in a country's media system that might impede pluralism, rather than to rank countries or describe the current state of media pluralism. The MPM mostly focuses its analysis on news and current affairs, and on a broad definition of media that includes various information channels, both digital and traditional, that disseminate news and current affairs and ultimately contribute to the shaping of public opinion. While media that uphold editorial responsibility in selecting content for dissemination are at the core of the MPM analysis, some structural elements of social media platforms services and business models are also considered insofar as they are deemed to contribute or limit the dissemination of news and information.

Table 1. Areas and Indicators of the Media Pluralism Monitor

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech

This report presents the results of the implementation of the Media Pluralism Monitor 2024 (MPM2024) in 32 countries, including the 27 EU Member States and five of the candidate countries (Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey), for the year 2023. Therefore, the analysis covers the year preceding the year of publication. The consequences of reforms in the media sector that have been announced and not implemented, are not considered in the analysis. The MPM project is co-funded by the European Union.

Media freedom and pluralism, together with freedom of expression, are fundamental prerequisites for democratic societies. The availability of information in the public interest and access to free and independent journalism are vital for enabling informed citizen participation in democratic processes. The European Union recognises the significance of these principles, as reflected in various official documents. *These freedoms are embedded within the Charter of Fundamental Rights of the European Union (Article 11) and are safeguarded by Article 10 of the European Convention on Human Rights*, which all EU Member States and candidate countries evaluated in the MPM have ratified.

The media landscape has undergone profound changes in recent years, primarily fuelled by swift technological progress and shifts in consumer habits. Central to this transformation is the digital revolution, characterised by the emergence and dominance of online intermediary platforms and major digital corporations (Moore & Tambini, 2018). These entities have reshaped the media market, exerting significant influence on how content is created, distributed,

and monetised (Irion et al., 2022a). Traditional media models, which relied on direct consumer sales and advertising revenue, have been particularly affected, facing a decline in their sustainability as digital platforms capture more of the advertising market share.

The media, historically pivotal in shaping the public's perception and opinion on various issues, no longer holds a monopoly over this influence. As noted by Helberger (2020), the media's role as the primary opinion-forming power has been significantly diluted. This shift is largely attributed to the rise of a few major technology companies that have become central in the global content delivery ecosystem. These tech giants now play a critical role as intermediaries in the distribution and consumption of content, including news. Their platforms facilitate a wide spread of information, effectively positioning these companies at the heart of the contemporary information environment. This development highlights a transformation in how information is disseminated and consumed, shifting the dynamics of power from traditional media houses to technology-driven platforms.

Alongside this shift, the state of news consumption presents a rather discouraging picture (Newman et al., 2023). Surveys indicate that interest in news continues to decline, following a stable negative trend. News avoidance and news fatigue remain a significant problem, hardened by news on climate change, the Ukraine war, and the Israel-Gaza conflict (see below). The proportion of news readers who trust “most news most of the time” is also slightly decreasing in most European countries and, unsurprisingly, newspaper subscriptions remain stagnant (Ibid). Meanwhile, the fast development and widespread adoption, on a mass scale, of advanced generative AI technologies, pose additional challenges to the survival of the media as we know it. Generative AI is emerging as a new technology that enables machines to create models of text and images, music, and video. While this is a very exciting opportunity for the generation and distribution of content, at the same time this technology has the capability to significantly influence the media landscape in many ways. First, it can lead to increases in the volume, quality, and personalization of information, and (dis-)information. As generative AI becomes more advanced and accessible for mass usage, the potential for misuse in creating and spreading disinformation grows, which could harm public debate and be detrimental for the integrity of the public discourse. Further, generative AI is fed by existent data and content and has the ability to exploit copyrighted works without the express permission of the right-holders. Thus, the issue of whether AI-generated outputs can infringe upon the copyright accorded to the original author, or, in particular, exploit media content, has become a core issue and a legal challenge. In December 2023, the *New York Times* sued OpenAI and other AI companies in the wake of the allegedly unfair usage of the media's copyrighted content in training AI models, without proper authorization, and without compensation. In Europe, in the same period, Axel Springer SE adopted a different strategy, negotiating with AI companies the use of the content of Springer's media outlets.

These different approaches demonstrate how the next frontier for media survival will be played out, tackling the market imbalance between AI companies and content producers, in particular news media.

To face the societal challenges of AI technology development, the EU has adopted the Artificial Intelligence Act (AIA), a comprehensive regulatory framework aimed at overseeing the development and deployment of AI technologies within the European Union. The AIA introduces a risk-based classification system for AI applications, distinguishing between unacceptable, high, limited, and minimal risk levels. High-risk AI systems, such as those involved in critical infrastructure, healthcare, and law enforcement, are subject to stringent requirements, including rigorous testing, high data quality, and clear accountability mechanisms. Media pluralism is not covered under high-risk rules. This legislation emphasises transparency, human oversight, and ethical considerations to ensure AI technologies align with EU values and safety standards.

AI, indeed, presents a double-edged sword for journalism and media (Diakopoulos et al., 2024), posing significant challenges, undermining journalistic credibility, and affecting employment within the industry. Yet, AI can be an invaluable asset to journalism, enhancing the efficiency and capabilities of newsrooms. It can assist in data analysis, automate routine reporting tasks, and help journalists uncover and tell stories more effectively through advanced research tools and content personalization. Thus, while AI introduces risks, its strategic use can also greatly benefit the field of journalism. Acknowledging this, in 2023, the Council of Europe published its Guidelines on the responsible use of artificial intelligence (AI) systems in journalism (Council of Europe, 2023). These Guidelines offer practical advice to stakeholders such as news media organizations, states, technology providers, and digital platforms involved in news dissemination. The guidance details how AI systems can be effectively integrated into journalism production and how to develop standards for the ethical use of AI in journalism.

As we navigate the complexities of technological advancements, it becomes increasingly essential to emphasise the importance of safeguarding the media's existence, independence, plurality, diversity, and accessibility in the digital environment. Within this framework, the unique and fundamental role of quality media as a pillar of democracy and a primary source of information must be stressed and reiterated, while the critical need to ensure its survival for the integrity of the democratic debate is underscored. Unlike online platforms, which lack and ostensibly refuse direct liability for the (usually) third-party content they host, media are deemed to follow professional standards and are accountable for their publications. Strengthening this aspect of media regulation is essential for ensuring that the media continues to serve its critical role in informing the public and upholding democratic values in the digital age.

In this regard, the European Union has complemented its regulatory intervention on digital services and digital markets (Digital Services Act (DSA) and Digital Markets Act (DMA)) with another regulation that is media sector-specific. Although media regulation has historically been the purview of individual Member States, the last three years marked a historical shift in media policy at EU level, resulting in the approval, in 2024, of a regulatory instrument called the European Media Freedom Act (EMFA),¹ which is designed to benefit the internal market, aiming to strengthen media pluralism and enhance media freedom across the EU. It represents a significant effort to create a comprehensive framework to protect these fundamental principles, establishing a coordinated approach at the EU level to enhance media freedom and media pluralism. The EMFA addresses, among many issues linked to media policy, the delicate relationship between Very Large Online Platforms (VLOPs) and Very Large Search Engines (VLOSEs) with media services when it comes to content moderation, complementing Art. 34 and Art. 35 of the DSA. These two articles focus on ensuring that very large platforms and very large search engines, as defined by the DSA itself, are proactive in identifying and mitigating any systemic risks that may arise from their operations, including risks for media pluralism, media freedom and civic discourse, reflecting the DSA's rationale on ensuring accountability and safety in the digital space through platform's compliance. The interplay of these two sets of rules, including the necessary dialogue between them, will be crucial in determining the evolution of the interplay between media and online platforms in the near future, and will affect pluralism in the online sphere (Van Drunen et al., 2024; Nenadic & Brogi, 2023).

Most of the issues regulated by the European Media Freedom Act were flagged by the analysis of the Media Pluralism Monitor in the ten years of its implementation (Brogi et al., 2024). The new regulation mandates Member States to safeguard media independence and editorial independence, forbids invasive surveillance of journalists and editors, and protects their sources. The regulation foresees safeguards to enhance independence of PSM and prevent it from being captured by political interests, as well as requiring sustainable, predictable, and transparent PSM funding. To allow the public to know who controls individual media outlets and what interests may lie behind their ownership, all news outlets, from the largest to the smallest, must publish information about their owners. Media outlets must also report on the funds they receive from state advertising and the criteria for allocating these funds to media or online platforms must be public, proportionate, and non-discriminatory. Art 22 of the EMFA, moreover, requires rules at the national level to entrust media authorities to carry out a “media pluralism test”, based on criteria defined by Art. 22 itself, integrating and complementing the competition evaluation. This media-specific evaluation can be “reviewed” by the Commission and the

¹ Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU, *OJ L*, 2024/1083, 17.4.2024 (https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202401083)

Board in case of a merger that is relevant for the internal market. EMFA has also established the Board for European Media Services (EBMS), a committee gathering national media regulators that will help the Commission to ensure the implementation of the Act. The Act (Art. 26) also foresees a mechanism to monitor the internal market, which will be carried out annually.

The monitoring exercise will encompass: (a) an in-depth examination of media markets across all Member States, focusing on media concentration levels and the threat of foreign information manipulation and interference; (b) a comprehensive review and future-oriented evaluation of the overall functioning of the internal market for media services, especially considering the impact of online platforms; (c) an analysis of risks to media pluralism and the editorial independence of media service providers that may affect the internal market's functioning; (d) a summary of actions taken by media service providers to ensure editorial decision-making remains independent; (e) a thorough review of the systems and methods used in the distribution of public funds for state advertising. The monitoring will be conducted annually. The findings, including the methodologies and data utilised, will be publicly disclosed and presented annually to the European Parliament.

It must also be acknowledged that another recently approved European regulation affecting the media sector, the DSA, is establishing a new governing body, namely the European Board for Digital Services (EBDS). The EBDS is composed of national regulators, known as Digital Services Coordinators, who are responsible for implementing and enforcing the DSA (Art. 61 DSA) (see Jaurisch, 2024; Brogi and Nenadic, forthcoming). Conversely, the EBMS under the EMFA will effectively replace the European Regulators' Group for Audiovisual Media Services (ERGA), but with expanded responsibilities that include fostering cooperation and mutual assistance among National Regulatory Authorities (NRAs) (Arts. 8 - 16 EMFA) (see Brogi et al., 2023). However, it remains to be seen how these two levels of governance, for issues that are relevant to media regulation, will be coordinated.

EMFA is complemented by a corpus of hard and soft law measures that work in the direction of upholding media in the EU. The recommendation on internal safeguards for editorial independence and ownership transparency in the media sector² was published alongside the EMFA Commission proposal. In April 2024, the EU anti-SLAPPs Directive was enacted (2024/1069³); it stems from a Proposal of the European Commission of April 2022. The directive aims to counter legal actions intended to censor, intimidate, and silence critics by burdening them with the cost of a legal defence until they abandon their criticism or opposition. This initiative seeks to protect journalists, activists, and in-

2 Commission recommendation (EU) 2022/1634 of 16 September 2022)

3 Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation') <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024L1069>.

dividuals from lawsuits that are often baseless and meant primarily to stifle free speech. Key elements of the directive include measures to quickly dismiss unfounded lawsuits, provide legal support and financial aid to defendants, and impose penalties on those who misuse the legal system to file such lawsuits. The proposal builds on, and complements, the 2021 Recommendation on ensuring journalists' and other media professionals' protection, safety, and empowerment.

It requires all the EU Member States to transpose it into their national legal framework, but the scope of the Directive is limited to cross-border civil proceedings. It includes an explicit rule on the burden of proof, which makes it clear that the claimant, and not the defendant, must prove facts they raise before the court. Furthermore, an early dismissal mechanism is enabling national courts to dismiss SLAPPs in an accelerated procedure. However, great discretion is still left to Member States. For this reason, the Directive has been welcomed by civil society in Europe, but also considered as setting the *minimum standards* needed, to be further integrated in the future on a European and national level.⁴ In April 2024, the Council of Europe also enacted Recommendation CM/Rec(2024)2 “on countering the use of strategic lawsuits against public participation (SLAPPs)”.

In the last three years the European media environment has also been substantially affected by the large-scale invasion of Russia in Ukraine. Not only has the war affected the politics and economy of the whole European continent, but it also has meant the spread of a significant amount of disinformation and propaganda across any means of communication (European Commission, 2023). On top of the European Union's measures to counteract disinformation, including the implementation of self-regulatory measures (the 2022 Code of Practice on Disinformation), and co-regulatory measures such as the DSA, the EU has deployed and confirmed the ban on RT and Sputnik and of other media outlets allegedly spreading Russian disinformation.⁵

Regrettably, the year 2023 was marked also by another conflict which has had repercussions in EU politics and public debate (and not only in the EU). On 7 October 2023, Hamas launched one of its biggest and bloodiest attacks on Israel, in what has signalled a grave upsurge in the Israel-Palestine conflict. The attack has provoked an iron response from Israel, inflicting huge losses in the Gaza Strip and a high toll of deaths, including thousands of civilians, with a very severe humanitarian crisis unfolding.

4 Anti-SLAPP Directive: CASE statement on the political agreement. 8 January 2024, <https://www.the-case.eu/latest/anti-slapp-directive-case-statement-on-the-political-agreement/>

5 Judgement of the General Court (Grand Chamber) of 27 July 2022. RT France v Council of the European Union. Case T-125/22, [62022TJ0125 - EN - EUR-Lex](https://eur-lex.europa.eu/eli/j/tj/2022/0125/oj)

The conflict has polarised the public debate worldwide to a worrisome extent. Irene Khan, the UN Special Rapporteur on freedom of expression and opinion has called it “a global crisis of the freedom of expression”.⁶ Moreover, while the war in Ukraine has been described as hyperconnected because of real-time updates and wide social media interaction alongside a digital coverage from innumerable sources, the conflict in Gaza has been marked by limited coverage on the ground, as no international journalist has been granted access to the Gaza Strip.⁷ Based on CPJ data, between 2022 and 2023, 15 journalists were killed in Ukraine;⁸ in 2023 alone, 62 journalists were killed in Israel and in the Occupied Palestinian Territory.⁹ As of 9 May, 97 journalists and media workers were confirmed dead, 92 Palestinians, two Israelis, and three Lebanese; 16 journalists were reported injured; four journalists were reported missing; 25 journalists were reported arrested.¹⁰

The European Commission has stated ((C(2023) 7170 final): “The world is witnessing an unprecedented period of conflict and instability. With Russia’s war of aggression against Ukraine and with the terrorist attack by Hamas in Israel. With the wide reach of social media, violence and war increasingly reverberate online in the Union. This has had as its consequence an unprecedented increase in illegal and harmful content being disseminated online, including coordinated actions to spread disinformation and misinformation throughout the Union in relation to such international crises.” It has also called on states for a swift implementation of the DSA and for the support of the Digital Services Coordinators in starting even informal and voluntary cooperation to face the challenges of current times.

While the DSA is in full swing, EMFA and the Regulation on targeting and transparency of political advertising¹¹ were to be applicable in the event of the 2024 European elections. The EU has already put in place several measures to be ready to tackle disinformation, in all its facets. It must be stressed that addressing online disinformation effectively demands a sophisticated approach that balances the risks to democracy with the protection of fundamental rights. The European Union has initiated this effort by creating a regulatory framework that both regulates online platforms and promotes media freedom and pluralism. However, the success of these regulations largely depends on their careful implementation and proper assessment of their impact. A balanced implementation approach

6 <https://news.un.org/en/story/2024/04/1149001>

7 [‘Hugely frustrating’: international media seek to overcome Gaza ban | Israel-Gaza war | The Guardian: Journalists call for foreign media access to Gaza in open letter](#)

8 [42 Journalists Killed](#)

9 https://cpj.org/data/?status=Killed&start_year=2023&end_year=2023&group_by=location_sorted&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist

10 [Journalist casualties in the Israel-Gaza war](#)

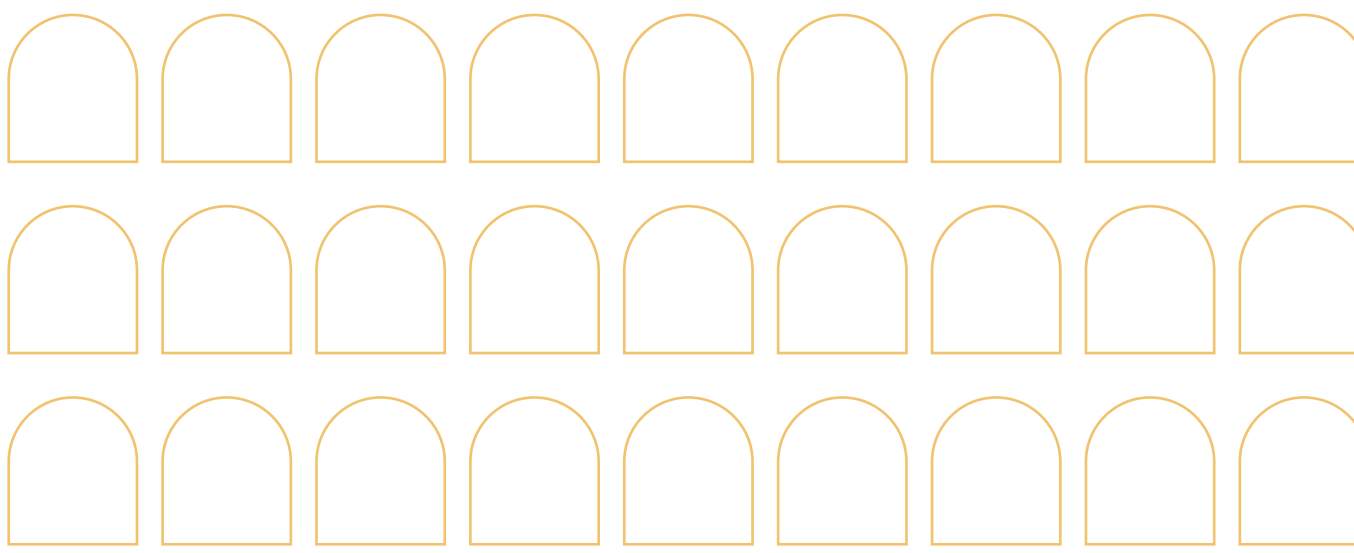
11 The Regulation on the Targeting and Transparency of Political Advertising (COM(2021)0731 – C9-0433/2021 – 2021/0381(COD)) was approved by the European Parliament on 27 February 2024. It specifically sets up rules for political campaigners, entities providing political advertising services, and publishers. These rules include transparency provisions, as well as limits on the typology of personal data that can be used.

is crucial, involving multiple stakeholders like platforms, media entities, and civil society. As the landscape of online disinformation continues to evolve, ongoing evaluation, policy adjustments, and international collaboration will be essential to effectively combat disinformation without undermining the foundational values of an open society.

While 2024 is called the “election year” as approximately half¹² of the global population is voting, including the EU for the new European Parliament, 2023 has already seen many rounds of general elections in EU Member States (Bulgaria, the Netherlands, Poland, Luxembourg, Finland, Greece, Spain, and Slovakia).¹³ It will be interesting to monitor, in the next MPM editions, how political shifts are affecting and will affect the media landscape in some countries.

12 <https://time.com/6550920/world-elections/2024->

13 [The European Elections Monitor](#)



3. FUNDAMENTAL PROTECTION

Fundamental Protection indicators are designed to describe and measure the preconditions for a pluralistic and democratic society. The first indicator that is assessed in this area is the level of the protection of freedom of expression, “the cornerstone of democracy and key to the enjoyment of other rights” (Council of Europe, 2022). Freedom of expression is guaranteed by Article 11 of the EU Charter of Fundamental Rights and Article 10 of the European Convention on Human Rights (ECHR) and encompasses not only the freedom to hold opinions and to receive and impart information and ideas without interference from the public authority, but also the freedom and pluralism of the media, both online and offline.

Along with the freedom of expression, and stemming from it, the right of access to information is another fundamental precondition of democracy. It is of utmost importance that the effective transparency of public administration is guaranteed and that information that is in the public interest can be circulated to feed the political debate and, in the end, to strengthen democracy. For that reason, contemporary democracies should guarantee access to public information and documents, grant protection to whistleblowers, and ensure that those who have information on issues of public interest are able to communicate with journalists securely and confidentially (Council of Europe, 2022). A free and pluralistic media environment relies on the free conduct of the journalistic profession. This means that access to the profession should be open; journalists should be able to enjoy decent working conditions and be able to work safely and without threats or harassment. States should guarantee an “enabling environment”¹⁴, ensuring that journalists and other media actors are able to express themselves freely and without fear of facing repercussions, even when their opinions are contrary to those held by the authorities, or by the majority of public opinion. The MPM therefore considers the safety of journalists, both physical and digital.

¹⁴ CoE, 2016; European Court of Human Rights (ECtHR) case *Dink v. Turkey*, 2668/07, 6102/08, 30079/08, 7072/09 and 7124/09, Judgment on 14 September 2010.

The Fundamental Protection area also takes into account the impartiality and independence of the institutions that oversee the media market as fundamental elements of a pluralistic media environment. Finally, the Fundamental Protection area includes an assessment of the universal reach of traditional media and access to the internet. These are essential pre-conditions that contribute to the assessment of whether citizens can access a wide variety of content, given the infrastructure.

The indicators aim to capture risks in relation to specific legal standards by measuring both the existence of legislation in a given area and how it is implemented in practice. In addition to this, the MPM assesses the effective socio-political conditions affecting the enjoyment of freedom of expression. The five indicators examined under the Fundamental Protection area are:

- *Protection of freedom of expression*
- *Protection of the right to information*
- *Journalistic profession, standards and protection*
- *Independence and effectiveness of the media authority*
- *Universal reach of traditional media and access to the Internet*

The analysis of MPM2024's results in the **Fundamental Protection** area indicates that, in the EU and candidate countries, the average risk for this area is slowly increasing, reaching 37%, which is 3 percentage points more than last year, and 4 more than in MPM2022, although it remains in the medium-risk band.

For the **Fundamental Protection** area, fourteen countries scored a low risk: Austria, Belgium, Denmark, Estonia, Finland, Germany, Ireland, Lithuania, Luxembourg, Portugal, Slovakia, Sweden, the Czech Republic, and the Netherlands. Compared to MPM2023, six countries moved to the medium-risk band: Cyprus, France, Italy, Latvia, Malta, and the Republic of North Macedonia. In MPM2024, seventeen countries scored medium-risk: Albania, Bulgaria, Croatia, Cyprus, France, Greece, Hungary, Italy, Latvia, Malta, Montenegro, Poland, Romania, Serbia, Slovenia, Spain, and the Republic of North Macedonia. The only country that scored a high risk was Turkey, which is consistent with the last three years of MPM implementation.

The most significant change in risk score that moved some countries from the low to the medium-risk band for the **Fundamental Protection** area took place in Latvia (from 21 to 35%). Other noteworthy risk increases, while maintaining the affected countries within the same risk range as last year, include Greece (from 52 to 61%), Slovakia (from 24 to 33%) and Lithuania (from 17 to 29%). We will outline the reasons for these changes later in this chapter.

The indicator **Protection of freedom of expression** scored as being at medium-risk (34%), on the cusp of being at low risk. A medium-risk was observed in 14 countries: Albania, Austria, Bulgaria, Croatia, Greece, Hungary, Ireland, Italy, Montenegro, Poland, Portugal, Serbia, Slovenia, and Spain. In MPM2024, Turkey was the only country to score high risk as in the previous year. Some countries, like Austria, Montenegro, and Portugal, shifted from low to medium-risk. The most commonly reported issues are the ongoing lack of decriminalisation of defamation, and the continuous lack of transparency of online platforms' blocks, removals, and filtering of content. In almost all the countries under analysis, the constitutional framework guarantees freedom of expression; however, in practice, this fundamental right is not always enjoyed freely.

The indicator **Protection of the right to information** (42%) scored as a medium-risk. In 2023, important developments occurred at the EU level in this area, as most of the EU countries, Estonia and Poland excluded, transposed the 2019 EU Whistleblowing Directive.

The countries scoring a high risk with regards to this indicator are Hungary, Malta, Montenegro, and Turkey, where—even if legal frameworks to guarantee access to public documents are in place—they are not really effective in practice. The MPM2023 reported a significant deterioration in access to information brought by the judgement of the EU Court of Justice, which suspended public access to beneficial ownership registries on the basis of their interference with the rights to privacy and personal data protection under the EU Charter of Fundamental Rights. As a result, the proposed 6th EU Anti-Money Laundering Directive—on which the Council and Parliament reached a provisional agreement in January 2024, currently awaiting for the final text to be finalised and officially published—introduces the obligation to demonstrate a “legitimate interest” in this context granting special rights to the press and civil society to access information, as further explained in the sub-indicator *Legal protection of the right to information*.

Journalistic profession, standards and protection (43%) also scored as being at medium-risk, as in MPM2023. Croatia and Turkey registered a high risk. In both countries, high risks were detected in particular for the sub-indicators on *Physical and digital safety*, *Journalism and data protection*, respect for *Positive obligations*, and *Working conditions of journalists*. Overall, the sub-indicator posing the higher risk is that related to journalists' digital safety (69%). In general, the digital dimension registers a higher risk for all the sub-indicators, e.g. regarding journalists' working conditions online. With regards to journalists' physical safety, worrying events took place in Turkey, Spain, and the Netherlands, including physical attacks and arrests of journalists, which will be better outlined later in this report.

Poor working conditions in some of the countries assessed persisted, and the low popularity of journalistic associations has made bargaining for better working conditions even more difficult, as reported in Slovakia for example (Urbaniková, 2024). Nine countries scored a low risk for the **Journalistic profession** indicator, namely Denmark, Estonia, Finland, Germany, Lithuania, Luxembourg, Portugal, Sweden, and the Republic of North Macedonia. Denmark stands out for scoring a particularly low risk (10%), far lower than the second country with lowest risk (Germany, 25%).

There was a minor deterioration in the indicator **Independence and effectiveness of the media authority** (which moved from 25% to a 26% risk score). The sub-indicator demonstrating the highest risk under this indicator remained that relating to *Appointment procedures*. This is due to the weakness of the mechanisms that may be able to push back against political and commercial influences and ensure the independence of the authorities through appropriate appointment procedures. While political appointments do not automatically mean that the authority will act in line with political pressure, they clearly pose the risk of interference. Moreover, appointments of the authorities responsible for the DSA implementation raise concerns for resources and competences, especially when more authorities in the same country are competent in the media field. Relatedly, there is a prospective concern for the uniform application and effectiveness of the DSA across the EU (Brogi & Nenadić, forthcoming).

The aggregate risk score for the indicator **Universal reach of traditional media and access to the Internet** was 41% in MPM2024. While universal coverage of the Public Service Media (PSM) is legally guaranteed in every country comprising the MPM, in several countries it still falls short in practice. The risk score for net neutrality and PSM coverage remained consistent with MPM2023. Overall, the percentage of households with broadband coverage and internet access increased slightly.

Figure 3.a. Fundamental Protection area - map of risks per country

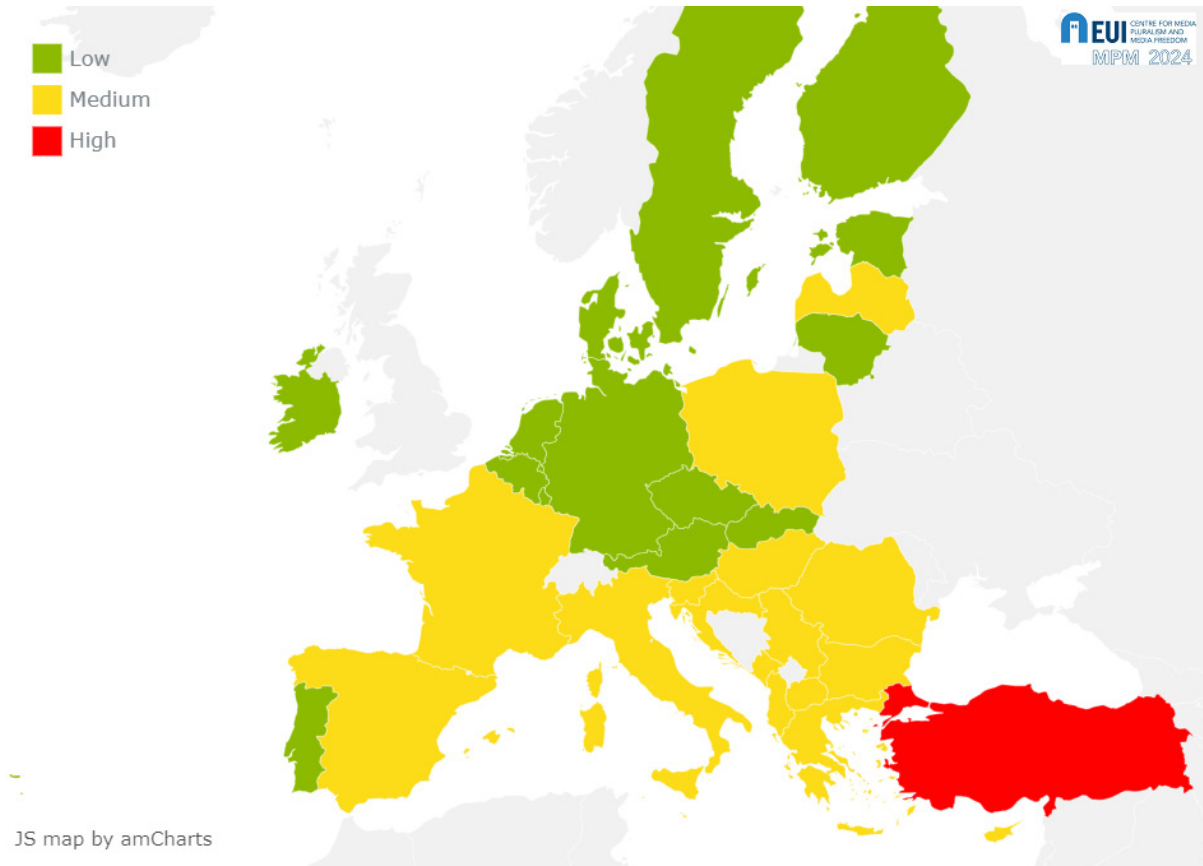
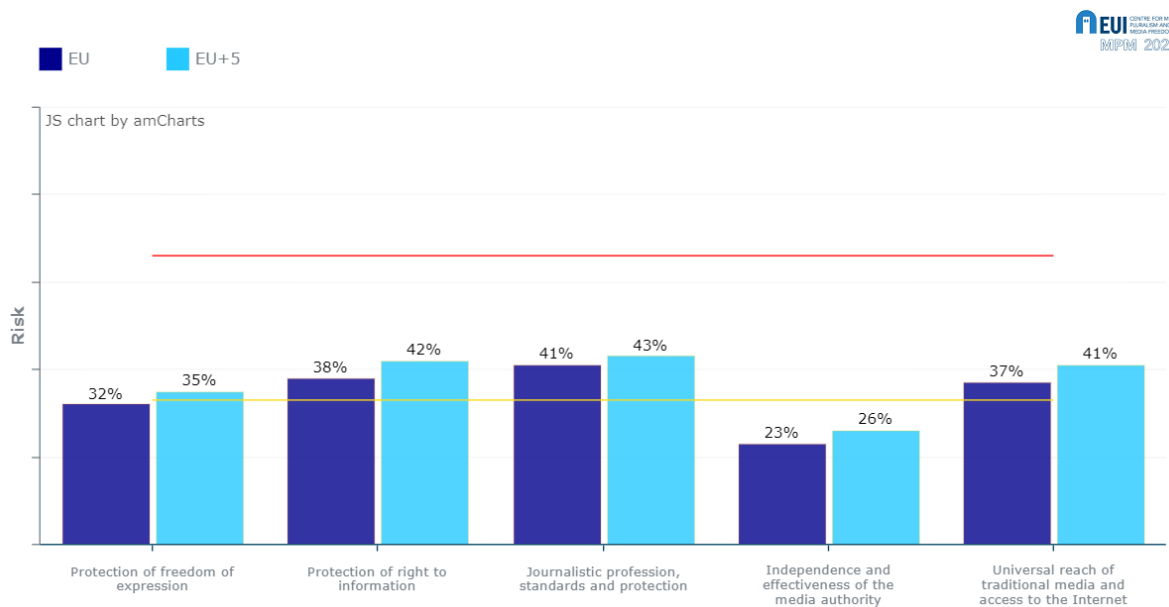


Figure 3.b. Fundamental Protection area - averages per indicator



3.1 Protection of freedom of expression

Freedom of expression is considered to be the cornerstone of democracy. Freedom of the press, freedom of the media, and the right to access information, which all stem from the recognition of the freedom of expression, are necessary conditions for a public sphere dialogue, one based on the free exchange of information and opinions. Additionally, freedom of expression also “enables” other rights, namely, the right to assembly, the right to join a political party, and the right to vote. Its protection is thus at the very core of any democratic society. EU Member States share, and are bound to respect, freedom of expression, since it is enshrined in Article 11 of the EU Charter of Fundamental Rights and in Article 10 of the European Convention on Human Rights (ECHR), and because it is at the core of their common constitutional traditions. Under the MPM2024, the indicator on the Protection of freedom of expression aims to assess the existence and effective implementation of the regulatory safeguards for freedom of expression in a given country. A country may have an adequate set of laws protecting freedom of expression, but their implementation and enforcement may be lacking. Constitutional guarantees and international treaty obligations may be eroded by exemptions and derogations, or by other laws that may limit the freedom of expression in an arbitrary way. In order to assess the levels of protection for freedom of expression, the MPM uses the standards that have been developed by the Council of Europe and the European Court of Human Rights (ECtHR) when interpreting Article 10 of ECHR. Restrictive measures must have a legal basis in domestic law, and this should be accessible to the person concerned and should be foreseeable in its effects; any limitations must have a “legitimate aim” and be “necessary in a democratic society”. The ECtHR has interpreted the scope of freedom of expression broadly, as it is considered essential for the functioning of a democratic society: “the dynamic interpretation, by the Court, of what is to be considered ‘necessary in a democratic society’, together with the limitation of the ‘margin of appreciation’ by the Member States, have been crucial for the impact of Article 10 of the Convention on the protection of freedom of expression in Europe” (CoE, 2021). This indicator includes a sub-indicator that specifically relates to defamation laws. While defamation laws are important in protecting people from false statements that damage their reputation, such laws can be abused. The criminalisation of defamation, as well as exorbitant claims for damages, may have a chilling effect on freedom of expression and journalistic freedom. The abuse of strategic lawsuits against public participation (SLAPPs) has exacerbated this phenomenon. Journalists should enjoy a position in which they can exercise their profession without fear. Online violations of freedom of expression are growing in frequency and importance.

Another element that is, therefore, taken into account in this indicator is whether freedom of expression online should be limited on the same grounds as freedom of expression offline. In this regard, the indicator takes into account whether Article 10 of the ECHR is respected and, in particular, whether restrictive measures resulting in the blocking, removal and filtering of online content comply with Article 10.2 ECHR (i.e., limitations on freedom of expression are prescribed by law, regardless of the existence of a specific law on content moderation online, they pursue a legitimate aim, and they are necessary for a democratic society). The indicator also considers whether filtering and blocking practices by internet service and content providers, and by a given state, are based on legitimate conditions and limitations, on transparent practices, or whether they are arbitrarily limiting freedom of expression online.

Figure 3.1.a. Indicator on the Protection of freedom of expression - map of risks per country

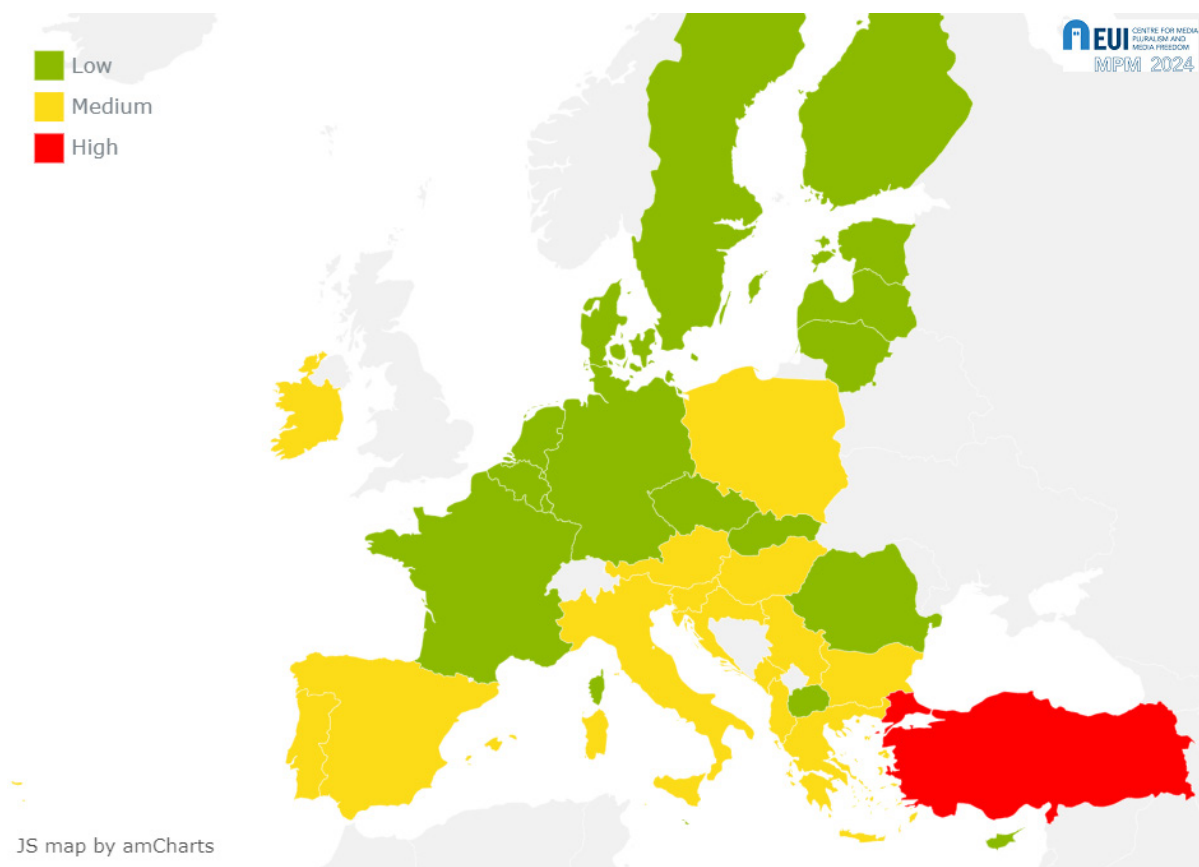
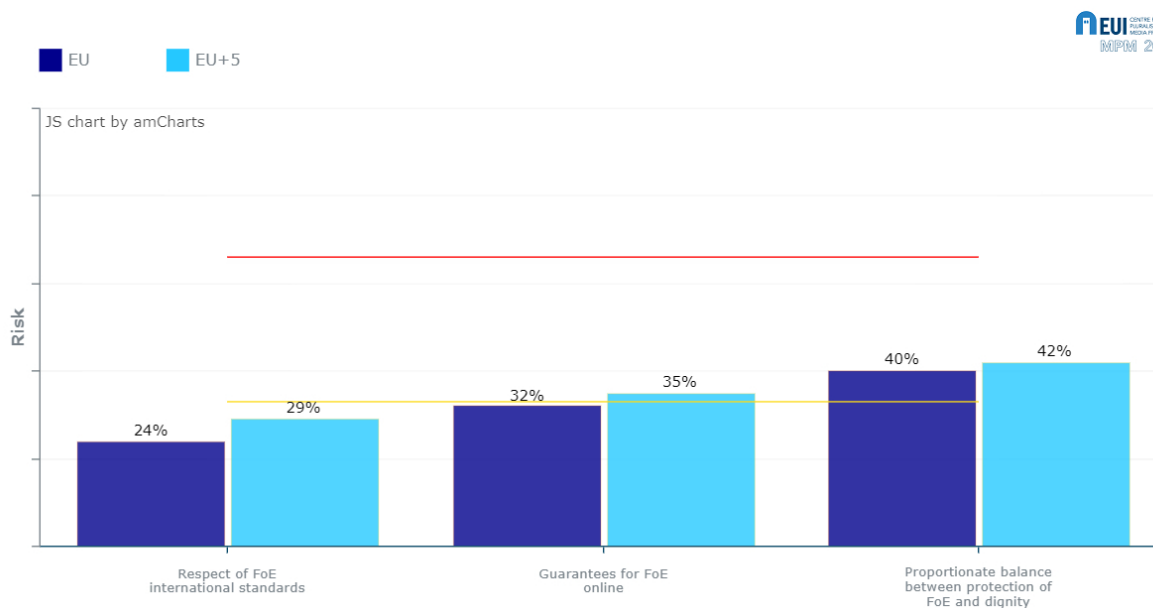


Figure 3.1.b Indicator on Protection of freedom of expression - averages per sub-indicator



The average of the indicator **Protection of freedom of expression (FoE)** scored a 35% risk score, with 17 countries scoring in the low-risk band, three countries fewer than in the MPM2023 implementation: Belgium, Cyprus, Denmark, Estonia, Finland, France, Germany, Latvia, Lithuania, Luxembourg, Malta, Romania, Slovakia, Sweden, the Czech Republic, the Netherlands and the Republic of North Macedonia. The case of Austria, increasing the risk for this indicator from 22 to 35% and thus entering the medium-risk score, is particularly worth noting: as reported by Seethaler and Beaufort (2024), there has recently been “violence at public events [that has] prevented journalists from reporting freely”, “press freedom has been undermined by various political pressures or restrictions on access to information” (Reporters Without Borders, 2023) and “attempts by politicians to discredit serious journalism” have become more frequent (Forum Informationsfreiheit, 2024, cited in Seethaler & Beaufort, 2024). Therefore, the constitutional guarantees of freedom of expression are sometimes disregarded in practice. The criminalization of defamation in Austria contributes to ongoing risks in this regard.

Montenegro also shifted from low (32%) to medium-risk (47%) in MPM2024, as well as Portugal (from 27 to 36%). As regards Montenegro, the result was affected, among other things, by higher risks registered for the digital variables reflecting transparency in the online environment. In fact, Brkić Ružić (2024) reports the decreased transparency of online platforms Meta and X on content removal, and particularly the lack of such transparency by the state. A massive cyber-attack in August 2022 disrupted the work of public services in Montenegro, and the consequences were felt in 2023 too.

In response, in December 2022, a new Directorate for Information Security known as the government CIRT (Computer Incident Response Team) was set up, but the new body, like the old one, did not establish transparency reporting practices. In 2023, there were seven recorded cases of endangering the safety of journalists online (safejournalists.net). The reasons for an increase in risk for the indicator in Portugal, basically correspond to those causing a risk increase for Montenegro (Cádima et al., 2024): the increase is (i) due to the maintenance of legislation that criminalises defamation, despite good European practices and the recommendations of different international organisations; (ii) a lack of detailed and transparent information about the online blocks that digital platforms and IGAC (*Inspecção-geral das Atividades Culturais* - General Inspectorate of Cultural Activities) decide in light of the Portuguese legal framework. The rate of blocking following complaints is 93,3% (IGAC, 2023- cited in Cádima et al., 2024); the Statistics Bulletin of IGAC only provides large numbers and segmentation of the complaints by area. Still, it does not specify each case or clarify the reasons given for the blocking decision.

With regard to France, the country's risk score—even if remaining in the low-risk band—increased from 24 to 32%, attributable to cases of violence, spying and arbitrary arrests of journalists and activists, as well as new pressures on journalists within and from media conglomerates (Ouakrat & Sklower, 2024). Similarly, in Malta, the risk score for the indicator remained in the low-risk score but increased from 18 to 28%. As explained in the Maltese MPM2024 report (Repeckaite, 2024) this increase reflects the stalled reform process, the gap between proposed safeguards and international good practice standards, as well as the continued risk of SLAPPs. The country was announced as the SLAPP country of the year 2024 by the Coalition Against SLAPPs in Europe (CASE, 2024).

Moreover, a significant risk increase for this indicator can be detected for Croatia, which increased from 40 to 48% (still remaining in the medium-risk band): once again, the main reasons are related to the misuse of defamation laws and the lack of transparency on online blocks and removals by online platforms (Bilić & Petričušić, 2024).

A medium-risk was observed in 14 countries: Albania, Austria, Bulgaria, Croatia, Greece, Hungary, Ireland, Italy, Montenegro, Poland, Portugal, Serbia, Slovenia, and Spain. In MPM2024, Turkey was the only country to score as being at high risk for the indicator, as last year.

The indicator **Protection of freedom of expression** consists of three sub-indicators: *Respect for freedom of expression - international standards*, *Proportionate balance between the protection of freedom of expression and dignity* and *Guarantees for freedom of expression online*.

In the EU, the protection of freedom of expression benefits from an established tradition with regard to constitutional and legal safeguards, international standards, and case law. Constitutional and legal protection for freedom of expression is formally guaranteed in all the countries assessed. It is enshrined in their Constitutions and/or in their national laws, as the score for the sub-indicator on the *Respect for freedom of expression - international standards* demonstrates. This sub-indicator, on average, scored as a low risk (29%), as in previous MPM editions. As a general trend, the international human rights conventions that are relevant to freedom of expression standards, namely, the International Covenant on Civil and Political Rights (ICCPR, Article 19) and the European Convention on Human Rights (ECHR, Article 10), were ratified with no particular derogations. The main differences in this area among the various legal systems are to be found in the limitations to freedom of expression that are permitted under each constitution, in the legal order, or special laws, and in the proportionality of the specific limitations that are based on the interests of “national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary” (Article 10(2), ECHR).

In 2023, as was the case last year, Turkey was the only country that scored as being at high risk for this sub-indicator (85%). The country has reservations about the provisions of both the ECHR and ICCPR: for instance, regarding the provisions of Article 27 of the ICCPR, i.e., the maintenance of the right to interpret and apply its provisions in accordance with the related provisions and the rules of the Constitution of The Republic of Turkey, some of which violate the freedom of expression international standards. Malta also has reservations concerning several Articles of the ICCPR.

Nine countries scored as being at medium-risk for the sub-indicator *Respect of freedom of expression - international standards*: Albania, Bulgaria, Croatia, Greece, Hungary, Montenegro, Poland, Serbia, and Slovenia. In most of these countries, the key issue is the gap between the letter of the law and its implementation and enforcement. While the legal and regulatory framework that aims to protect freedom of expression is robust, violations of the exercise of freedom of expression are common, in practice. The situations are multiple, ranging from the persistence of criminal defamation laws, and the frequency of SLAPPs against journalists, to threats against journalists’ safety.

This is true in low-risk countries as well: for example, in France, Ouakrat and Sklower (2024) reported the “criminalization of civil disobedience, especially of the ecological movement *Les Soulèvements de la Terre* (Observatoire des libertés associatives, 2022; European Centre for Press and Media Freedom, 2023; Quadrature du net, 2023a; 2023b - cited in Ouakrat & Sklower, 2024). The situation has had consequences within the

media field, with the cutting of subsidies to local associative media in the Plateau de Millevaches (Creuse, Corrèze, Haute-Vienne departments), which are tied to the latter's network". In Malta, for the anniversary of the assassination of Daphne Caruana Galizia, press freedom groups reiterated that the atmosphere of impunity that led to the journalist's murder has remained unaddressed, especially in the area of journalists' safety (Article 19 et al., 2023 - cited in Repeckaite, 2024).

Within the indicator, **Protection of freedom of expression**, the sub-indicator *Proportionate balance between the protection of freedom of expression and dignity* scored as being the one at the highest risk (42%).

In Poland, one of the most concerning trends has been the disproportionate protection of dignity over freedom of expression, especially in regard to the political elite. Article 212 of the 1997 Criminal Code is overused in order to silence critical voices, and the recent amendments of the Polish Criminal Code (in 2019, 2022 and 2023) were not successful in changing the situation despite increasing criticism (Klimkiewicz, 2024). In Croatia, insult (Article 147) and defamation (Article 149) in the Criminal Act (OG 56/15, 61/15, 101/17, 118/18, 126/19, 84/21, 114/22, 114/23) are often misused to stifle journalistic freedoms and freedom of expression in general. While courts dismiss many cases, there is uncertainty and risk about the outcome, which puts pressure on journalists and their freedom to report on sensitive topics in the first place (Bilić & Petričušić, 2024). This is also the case in Greece, for example, where defamation is punished with imprisonment of up to one year (and up to three years if the act is committed publicly or through the internet) or by a pecuniary penalty (Article 362 of the Penal Code); the consequent chilling effects are common (Papadopoulou & Angelou, 2024).

In Turkey, insulting the President is provided as a crime by Article 299 of the Turkish Penal Code, and has been overused since the current President, Recep Tayyip Erdoğan, assumed office in 2014. In 2023, a 14-year-old secondary school student was sentenced to five months in prison for "insulting the President" (BirGün, 2023- cited in Inceoğlu et al., 2024). Ten of the thirty-two countries assessed scored as being at medium-risk. Six countries received the maximum score for medium-risk (66%): Austria, Slovakia, Slovenia, Spain, Poland, and Portugal. Another four, Bulgaria, Greece, Ireland, and Italy, scored 50%. Albania shifted from the medium to the high-risk band (83%), joining Turkey. As reported by Likmeta & Voko (2024), "according to the findings of the 2023 Albania Media Ownership Monitor, Albania's government employs a multifaceted strategy of rewards and punishments to shape media coverage. While certain prominent media outlets receive subsidies and concessions, those critical of the ruling party face fines, inspections, and other punitive measures" (Global Media Registry and BIRN Albania, 2023- cited in Likmeta & Voko, 2024).

In Italy, the persistent issue concerning defamation within the criminal legal system remains unresolved (Vigevani et al., 2024). Despite previous condemnations by the ECtHR because of provisions in the Press Law (No. 47/1948, Article 13) and the Criminal Code (Article 595), which mandated imprisonment for libel, the Italian Constitutional Court addressed the issue twice, in 2020 and 2021 (Ordinance no. 132/2020 and Sentence no. 150/2021). It issued interpretative rulings to restrict imprisonment for defamation to cases of exceptional severity, urging Parliament to enact a comprehensive reform. However, the laws pertaining to defamation have yet to be amended. Consequently, the use of defamation lawsuits against journalists persists, often wielded by influential entities as a means to initiate SLAPP cases.

In Italy, when adjudicating a case of alleged defamation through the press, the Court of Cassation (order no. 30522/2023) provides a reconstruction of investigative journalism, also invoking Article 21 of the Constitution. According to the Court, the "civil and useful role in democratic life" of investigative journalism needs to be protected, even if it does not lead to an immediate truth. Its value, the Court explains, lies precisely in its ability to stimulate the community, to the extent that its outcomes must be evaluated "not so much in light of the reliability and truthfulness of the news, but rather in the author's compliance with the ethical and deontological duties of the journalistic profession and good faith." Therefore, ethics are the true barrier set by the Supreme Court against defamatory or otherwise groundless initiatives disguised as journalistic investigations. "The relaxation of the truth canon," the decision reads, "is justified in light of the constitutional principle regarding the right to freedom of expression, when said journalism reasonably indicates a 'suspicion of wrongdoing' with the suggestion of an investigative direction to the investigative authorities or a denunciation of obscure situations that require administrative or regulatory interventions to be clarified, provided that they concern social issues of general interest, on the condition that 'suspicion and denunciation' are expressed on the basis of objective and relevant elements; indeed, in investigative journalism, suspicion must maintain its own 'propulsive and inductive character of deepening,' being autonomous and, in itself, ontologically distinct from the notion of attributing an untrue fact".

Twenty countries scored as being at low risk with regards to the sub-indicator *Proportionate balance between the protection of freedom of expression and dignity*, 15 of which are in the maximum band for the low-risk range (33%, Belgium, Croatia, Estonia, Finland, France, Germany, Hungary, Latvia, Lithuania, Luxembourg, Serbia, Sweden, the Czech Republic, the Netherlands and the Republic of North Macedonia). Four countries scored 17% (Denmark, Malta, Montenegro, and Romania), and only Cyprus scored 3%, the minimum in the low-risk band, as in the MPM2023.

Under the **Protection of freedom of expression**, the MPM also analyses whether freedom of expression online is formally guaranteed and respected in practice. The MPM sub-indicator, *Guarantees of freedom of expression online*, aims to analyse whether any restrictive measure, e.g., blocking, filtering and removing online content, complies with the three conditions that are set by Article 10(2) ECHR, namely, that limitations on the freedom of expression are prescribed by law, pursue a legitimate aim that is foreseen in Article 10(2) ECHR, and that are necessary for a democratic society, according to the case-law of the ECtHR.

Another aim of the sub-indicator is to collect information on, and assess the risks stemming from, the blocking and filtering practices of governments and online intermediaries, and to acknowledge whether content moderation practices and data-gathering practices are reported in a transparent way. It assesses the transparency and accountability of the online platforms when removing online content that is based on their terms of reference or on obligations that stem from legislation, co-regulation, and self-regulation. The sub-indicator on the *Guarantees of freedom of expression online* scored as being at medium-risk (35%). There are 14 countries that scored as being at medium-risk (Albania, Bulgaria, Croatia, Greece, Hungary, Ireland, Luxembourg, Malta, Poland, Portugal, Romania, Serbia, Montenegro, and Slovenia), which is 3 more than in MPM2023 (when Croatia, Slovenia, Malta and Portugal were scored as low risk and Cyprus scored medium-risk). In MPM2024, Cyprus, in fact, scored as being at high risk together with Turkey, increasing from 62% to 69%. Ireland is on the verge of being high risk (62%).

On paper, in virtually all the countries under analysis, the legal guarantees for freedom of expression are valid, including online. With regard to freedom of the press, however, it is not always clear which entities can be defined as media outlets (or “media service providers”, using the terminology of the newly enacted European Media Freedom Act). In Sweden, for example, the scope of interpretation is quite wide, as Swedish media entities benefit from automatic constitutional protection under the Freedom of Expression Act for their online publications and, in addition, since 2002 individuals also have the option to apply for a publishing certificate to obtain similar protection (Färdigh, 2024).

State authorities themselves generally seem to refrain from arbitrarily filtering and/or monitoring, and/or blocking, and/or removing online content. There were, however, concerning examples from Central-Eastern Europe and Turkey.

On the other hand, the MPM2024 data collection shows that online platforms sometimes moderate content online in a way that can be considered arbitrary, or at minimum, not transparent, as explained earlier in this text. The continuous lack of transparent reporting from online platforms was one of the main reasons why the MPM risks for the **Protection of freedom of expression** indicator increased for some countries, such as Croatia,

Montenegro, Italy, Portugal, and Turkey. In this regard, it will be interesting to observe if and how the provisions of the Digital Services Act and European Media Freedom Act regarding content moderation will be implemented by the EU Member States and candidate countries.

It is worth focusing on the blocks following the Russian invasion of Ukraine, on 24 February 2022, when several European countries, including Bulgaria, Germany, Estonia, Lithuania, Latvia, and Poland, resorted to restrictive measures against Russian media broadcasting services on their territories, which were spreading propaganda and disinformation, and which were perceived as being threats to their national security. The EU imposed sanctions on the state-owned outlets' (RT/Russia Today and Sputnik) broadcasting in the EU, as part of the broader sanctions package against Russia. This measure was not taken without controversy. It has been perceived as being a threat to freedom of expression and information in several Member States (Färdigh, 2023; Flynn, 2023; Kies & Lukasik, 2023). These blocks also involve the online dimension: in Latvia, for example, "Facebook (Meta) users regularly inform that their accounts have been restricted for a specific time following reports from other users, for example, for engaging in discussions about the Ukrainian war and defending Ukraine's position" (Rožukalne & Skulte, 2024). In Lithuania, "members of civil society have complaints about the transparency standards of information filtering/removals on global platforms (mainly because of the most popular network in Lithuania, Facebook) and especially in the context of Russia's war in Ukraine. These practices have not only ignited public discourse but have also led the Lithuanian government to seek clarification from Meta" (Jastramskis & Balčytienė, 2024).

Such blocks were continued in 2023, and in some cases enlarged their scope, being considered crucial ahead of the June 2024 European elections and beyond. This is especially the case in countries like Latvia where Russians are one of the largest ethnic minorities (26%), who—consuming Russian-language news—might be more exposed to Russian propaganda and disinformation. In Latvia, the National Security Concept (Latvijas Vēstnesis, 189, 29.09.2023) included the goal to stop broadcasting PSM's content in Russian as of 1 January 2026, "thus promoting the belonging of all Latvian citizens to a common informational space, which is based on the Latvian language and other EU languages". This decision was criticised by professional environment representatives as unrealistic and infringing on the PSM duty to reach different groups in society (Rožukalne & Skulte, 2024). In Sweden, the "foreign espionage law" came into effect on 1 January 2023. The act criminalised the release of sensitive information that could damage Sweden's relationships with its allies as foreign espionage. The act involved changes to the Freedom of the Press Act and the Fundamental Law on Freedom of Expression. So far, "there have been no observable violations of freedom of the press and expression resulting from this constitutional amendment" (Färdigh, 2024).

Most of the MPM researchers did not specifically report on the online blocks, removals and shadowbans related to the war in Gaza, which took place all over Europe from 7 October 2023. However, this phenomenon is worth mentioning, considering its magnitude and pervasiveness on a highly contested topic. Examples were reported from Italy, where Meta obscured the Instagram profile of the Italo-Palestinian activist Karem Rohana, who was reporting on the situation on the ground in Palestine. The same happened to the accounts of other Palestinian activists. Meta later apologised for this conduct, reactivating profiles (such as Rohana's) that it deemed non-violent and not associated with Hamas. It should be mentioned that when Rohana returned to Italy at the end of October 2023, he was the victim of an intimidating assault by four individuals (Vigevani et al., 2024; Carboni, 2023 cited in Vigevani et al., 2024).

The debate over monitoring journalists employing invasive spyware technologies is alive in some countries, for different reasons. In France, for instance, the Constitutional Council blocked a provision from the Justice Orientation and Programming Law (Law n. 2023-1059), which would have enabled the police to spy and remotely access and activate connected devices (phones, computers, tablets, cars, etc.) owned by suspected terrorists, organised criminals, and specific types of delinquents (Ouakrat & Sklower 2024). Since late 2022, France has been lobbying with six other countries (Greece, Cyprus, Malta, Sweden, Italy, Finland) to counter Article 4 of the EMFA, prohibiting the use of spyware against journalists. An agreement was reached in the final text, maintaining the prohibition but providing a list of exceptions (e.g. investigating on serious crimes punishable by custodial sentences) allowing for the use of surveillance technologies on journalists. In the Czech Republic, a recent case of two exiled Russian journalists living and working in Czechia, Alesya Marokhavskaya and Irina Dolinina, who were surveilled and faced threats from parties that appear to have acted on behalf of the Russian Federation, drew the attention of the Committee to Protect Journalists (Štětka et al. 2024). The Association of Latvian Journalists (ALJ) received information that the phone of the publisher of the Russian independent media outlet *Meduza*, and possibly also the means of communication of other journalists, was infected with the spyware Pegasus: consequently, it requested the authorities to provide information about the use of the Pegasus software in Latvia (Rožukalne & Skulte, 2024).

3.2 Protection of the right to information

The indicator on the Protection of the right to information is designed to assess the existence and effective implementation of regulatory safeguards in relation to access to information and to the protection of whistleblowers. Hence, it aims to assess one of the building blocks of media freedom and investigative journalism. The indicator, as in the previous MPM editions, focuses on the right to access to information by journalists and citizens more at large, the lawfulness of the limitations thereto, as well as the existence and effectiveness of appeal mechanisms, in cases where information is unduly withheld. The indicator is based on the principle that all public-sector information belongs to the public, with limited and qualified exceptions that must be justified by the authorities. The indicator is also composed by a sub-indicator on whistleblowers' protection, which aims to understand whether, in each country assessed, legislation on the topic exists; whether the state systematically raises awareness in relation to the protection available to whistleblowers and implements that legislation in practice, and whether the country is free from the arbitrary sanctioning of whistleblowers. Based on the standards of the Council of Europe (Recommendation CM/Rec (2014)7 of the Committee of Ministers to the Member States on the Protection of Whistleblowers), a "whistleblower" is "any person who reports or discloses information on a threat or harm to the public interest in the context of their work-based relationship, whether it be in the public or private sector". Whistleblowing is fundamental to journalists in their work of shedding light on wrongdoing (e.g., corruption, fraud) and in exposing situations that are harmful to the public interest. Whistleblowers should be protected, as they need specific channels in order to be able to expose their cases without fear of retaliation. Within the EU legal framework, whistleblowers are now protected under Directive (EU) 2019/1937 of the European Parliament and of the Council of 23rd October 2019, on the Protection of Persons who Report Breaches of Union Law (EU Whistleblowing Directive). According to Article 26 (1), Member States were supposed to bring the laws, regulations, and administrative provisions into force that are necessary in order to comply with this Directive by 17 December 2021.

Figure 3.2.a. Indicator on the Protection of the right to information – map of risks per country

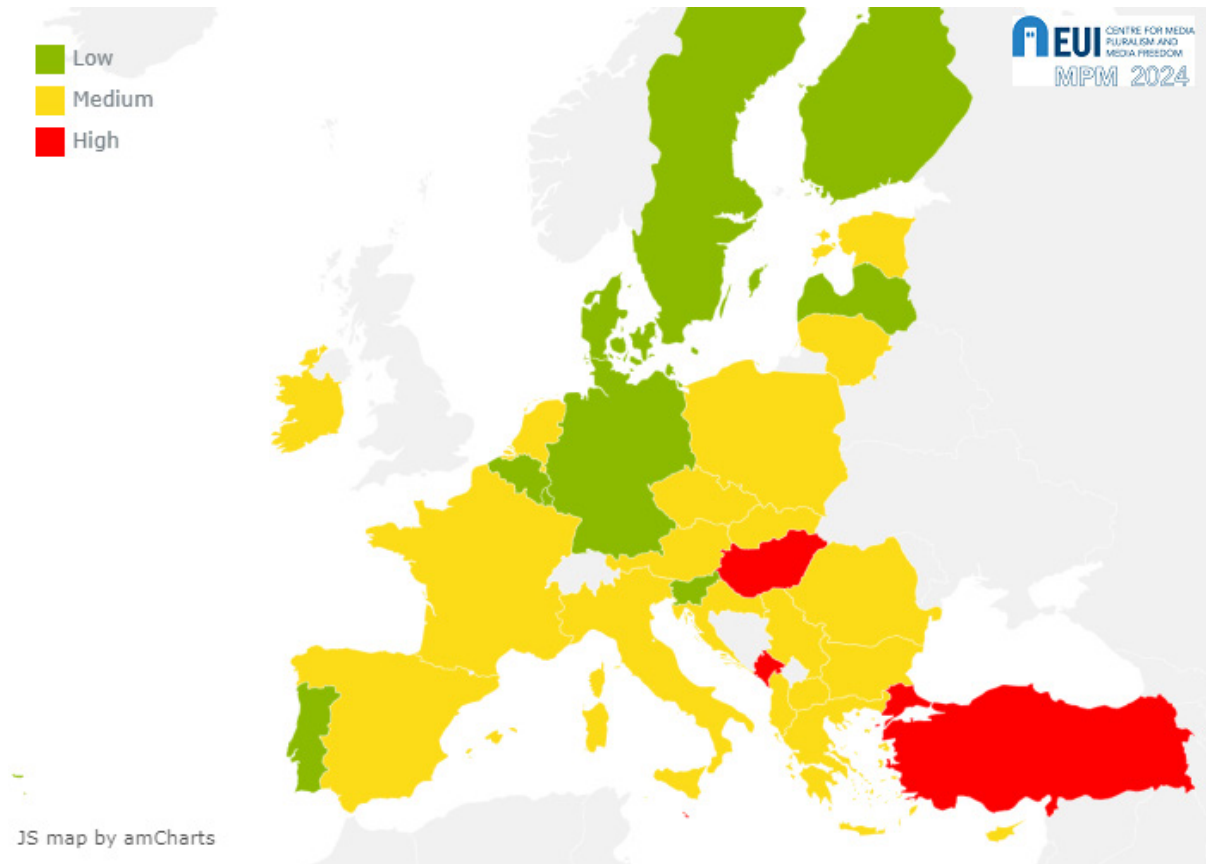
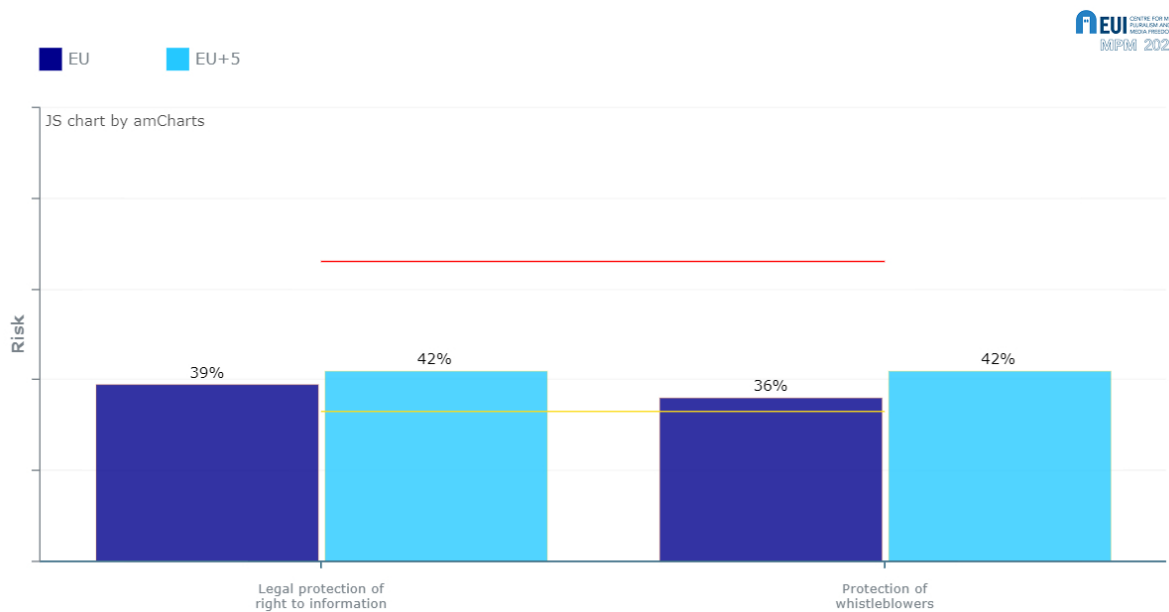


Figure 3.2.b. Indicator on the Protection of the right to information - averages per sub-indicator



The indicator **Protection of the right to information** scored as medium-risk, at 42% (EU+5). While the overall risk level has remained unchanged, when compared to the MPM2023, the situation in several of the EU Member States and candidate countries has altered. In the MPM2024, four countries are in the high-risk band: Hungary, Malta, Montenegro, and Turkey. Among these four, the new ones this year are Malta and Montenegro, which were in the medium-risk band in MPM2023. In Malta, the risk increased by 16 percentage points, from 61% to 77%, due to a reassessment of the situation on the ground by the local researcher. According to Repeckaite (2024), the legislative proposals aimed at changing the Maltese media laws present several deficiencies and have been considered weak by the Institute of Maltese Journalists. Also, FOI requests are often refused by state institutions. Indeed, Malta's so-called "unwarranted secrecy within state institutions" has been criticised by the Council of Europe's Commissioner for Human Rights in a letter sent to the country in 2023.¹⁵ A third factor is the ineffectiveness of the protection for whistleblowers, who usually face retribution. In Montenegro, where the risk score grew by 19 percentage points, from 54% to 73%, the increase is due to the serious limitations in the FOI requests, which are typically denied and/or delayed by state institutions (Brkić Ružić, 2024).

In the medium-risk band, there are currently 19 countries against 17 countries in the MPM2023. The medium-risk countries in the MPM2024 are: Albania, Austria, Bulgaria, Croatia, Cyprus, Estonia, France, Greece, Ireland, Italy, Lithuania, Poland, Romania, Serbia, Slovakia, Spain, the Czech Republic, the Netherlands, and the Republic of North Macedonia. When compared to the previous year, the new countries in this list are Cyprus, Spain (which presented a risk decrease, moving from high to medium-risk), France, Lithuania, Slovakia, the Czech Republic and the Netherlands, which, conversely, increased their risk score.

According to Christophorou and Karides (2024), the risk decrease in Cyprus is in part due to the adoption of the Law on the Protection of Persons that Report on Violations of the EU and National Law L.6(I)/2022, protecting whistleblowers, followed by the publication of guidelines to employers and employees by the Ministry of Justice in 2023. Likewise, in Spain, the improvement in the risk score is mainly due to the transposition of the EU Directive 2019/1937 on whistleblowers into national law¹⁶ (Suau et al. 2024).

On the other hand, in the countries where there was a deterioration of the risk score, the main reason associated with this is the lack of protection to whistleblowers or denials of FOI requests. For instance, in Slovakia, the risk increased by 16 percentage points, from 19% to 35%. According to Urbániková (2024) this rise is associated with cases

15 See <https://rm.coe.int/letter-to-the-prime-minister-of-malta-by-dunja-mijatovic-council-of-eu/1680acc42a> Accessed 26 April 2024.

16 Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción. <https://www.boe.es/eli/es/l/2023/02/20/2/con>

of arbitrary sanctions against whistleblowers, as demonstrates, for instance, the case of the Ministry of the Interior of the Slovak Republic that took place in 2023, which dismissed several officers from their positions at the National Crime Agency, disregarding their whistleblower status and failing to obtain prior approval from the Office for the Protection of Whistleblowers. In the Czech Republic, the risk deterioration was instigated by ongoing problems connected to the implementation of the Whistleblower Protection Act¹⁷ (Štětka et al. 2024). In the Netherlands, the risk score worsened because of a recent evaluation carried out by the Dutch government on the Access to Information Law¹⁸, which tells us that users report excessive use of the reason "well-functioning of the state" to justify the denial of access to information. Moreover, though the country has transposed the EU Directive 2019/1937 into national law, whistleblowers still lack protection, especially against being fired, sanctioned, or suffering unfair treatment as employees (De Swert et al. 2024).

The low-risk band for the indicator includes nine countries: Belgium, Denmark, Finland, Germany, Latvia, Luxembourg, Portugal, Slovenia, and Sweden. Newer to this list are Luxembourg, Portugal, and Slovenia. In Portugal, the improvement relates to better management of FOI requests (Cádima et al. 2024). In Luxembourg and Slovenia, the improvement is mainly due to the transposition of the EU Whistleblowing Directive. For instance, in Luxembourg, there was a considerable risk decrease of 28 percentage points, from 45% to 17%. According to Kies and Lukasik (2024) the main reasons explaining the improvement in the risk assessment (*Id.*, p. 12). are: the ECtHR decision of February 2023 ordering Luxembourg to pay damages on the grounds of not having recognized the whistleblower status of Raphael Halet, who leaked documents as part of the "Luxleaks" tax evasion scandal;¹⁹ the transposition of the Whistleblowing Directive in May 2023; and the announcement by parliament of a possible bill of law aimed at enshrining into legislation the right of access to information for professional journalists. Similarly, in the case of Slovenia, Milosavljević and Biljak Gerjevič (2024) argue that the Reporting Persons Protection Act (ZZPri) introduced important protection measures for persons who report a violation in their work environment and established additional obligations for taxpayers in the public and private sectors.

Latvia, while still in the low-risk range, exhibited an increase in the risk score from 13% to 23%. According to Rožukalne and Skulte (2024, p. 13), the change in the risk score can be explained "by too-long periods and slow procedures to access information and receive responses from official institutions." Likewise, in Lithuania, there was a risk increase from 17% to 35%, mainly justified by a national survey of journalists that reveals around a fifth of them report problems with FOI requests made to state and municipal institutions, which do not provide relevant information, citing violation of data protection rules

17 Whistleblower Protection Act, Act. 171/2023 Coll., transposing Directive (EU) 2019/1937.

18 Wet Open Overheid- Open Government Law- BWBR0045754, effective from 1 May 2022.

19 Halet v. Luxembourg (Application no. 21884/18) Judgement from 14 February 2023.

as a justification. Moreover, whistleblowers are not adequately protected in the country in terms of confidentiality and enterprise openness (Jastramskis & Balčytienė, 2024).

The sub-indicator *Legal protection of the right to information* has increased in risk by one percentage point, from 41% to 42% (EU+5), which is within the medium-risk range. In this sub-indicator, 17 countries scored as being at low risk, instead of 16 in MPM2023 (Belgium, Denmark, Estonia, Finland, Germany, Greece, Ireland, Italy, Latvia, Lithuania, Luxembourg, Portugal, Slovakia, Sweden, the Czech Republic, the Netherlands, the Republic of North Macedonia). In the medium-risk band, there are twelve countries this year (Albania, Bulgaria, Croatia, Cyprus, France, Malta, Montenegro, Poland, Romania, Serbia, Slovenia, and Spain), and three countries scored high risk (Austria, Hungary, and Turkey).

As already mentioned, the decision by the CJEU on Joined Cases C-37/20 and C-601/20, implied a deterioration in the guarantees for access to information, due to restrictions on public access to beneficial ownership registries, on the basis of their interference with rights to privacy and personal data protection under the EU Charter of Fundamental Rights. The proposed 6th EU Anti-Money Laundering Directive,²⁰ though providing for EU-wide public access to the data on beneficial owners, introduces the obligation to demonstrate a “legitimate interest” in this context. This means that in addition to supervisory and public authorities, and obligated entities, persons of the public with legitimate interest, including journalists and civil society, may access the registers.²¹

Moreover, in some countries, such as Hungary, the situation regarding this sub-indicator has further deteriorated in 2024. In December 2023, the Hungarian parliament, without any previous consultation, amended the regulations relating to accessibility of public interest information, defining new legal grounds to refuse freedom of information requests, exempting state owned enterprises from transparency requirements in relation to foreign investments and external relations for a period of ten years, and enabling the government to keep its resolutions secret for a period of 20 years, commencing on the date of issuance of the resolution. However, these changes may be seen in the risk assessment only from next year, as they will take effect in 2024 (Bleyer-Simon et al., 2024).

20 Proposal for a Directive of the European Parliament and of the Council on the mechanisms to be put in place by the Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and repealing Directive (EU) 2015/849 Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52021PC0423>. Accessed 24 April 2024.

21 Council of the EU (2024) Anti-money laundering: Council and Parliament strike deal on stricter rules. Press release, 18 January 2024, Available at <https://www.consilium.europa.eu/en/press/press-releases/2024/01/18/anti-money-laundering-council-and-parliament-strike-deal-on-stricter-rules/> Accessed 29 April 2024.

The MPM data point repeatedly to three important phenomena: (1) differences among countries, in terms of the robustness of legal protection of the right of access to information, are substantial; (2) a robust law is not a full guarantee of its exemplary implementation and enforcement; (3) a weak law does not necessarily mean that the public authorities use it to obstruct access to public-interest information. For instance, in Poland, there was a risk increase for this sub-indicator when compared to MPM2023, from 46% to 52%. According to Klimkiewicz (2024), this is due to a report published by the Supreme Audit Chamber in 2023 titled "Sharing public information by government administration units," which observed that, although authorities complied with most of their obligations related to the provision of public information, there were cases where requests took two and a half years to be answered or some cases even went unanswered altogether.

For the sub-indicator *Protection of whistleblowers*, the situation has remained the same as in MPM2023, with risk at 42% (medium-risk). Whistleblowing is an essential societal practice and supports some of the media's primary roles: monitoring the actions of public and private actors, exposing them when they misuse their position of power, and defending the public interest. Similarly, like journalists, whistleblowers act substantially as guardians of institutions (Lippmann, 1997). To serve these roles, they need to feel safe to come forward and to speak up when they observe law-breaking. The necessity to protect whistleblowers has recently been recognised in both the national and EU legislation through Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the Protection of Persons who Report Breaches of Union Law (EU Whistleblowing Directive).

The MPM variables on whistleblowing examine the existence of legal protection for whistleblowers, together with its effectiveness, public awareness of whistleblowers' protection and cases of governments that arbitrarily sanction whistleblowers. In the MPM2024, ten countries scored as being at low risk for this sub-indicator: Austria, Belgium, Denmark, Finland, Germany, Latvia, Luxembourg, Portugal, Slovenia, and Sweden. Eighteen countries scored as being at medium-risk: Albania, Bulgaria, Croatia, Cyprus, Estonia, France, Greece, Ireland, Italy, Lithuania, Poland, Romania, Serbia, Slovakia, Spain, the Czech Republic, the Netherlands, and the Republic of North Macedonia. With regard to legal protection, EU Member States were expected to transpose the EU Whistleblowing Directive into national legislation by 17 December 2021. Almost all EU Member States have transposed the Directive, with the exception of Estonia and Poland, whose draft laws are still progressing in parliament.²²

²² In this regard, see <https://www.whistleblowingmonitor.eu/country/> Accessed 29 April 2024.

Despite the transposition of the EU Whistleblowing Directive, it is still necessary to raise awareness and effectively protect whistleblowers, as in some countries they still face retribution. In this regard, the Maltese country report refers to the situation of a whistleblower—in the case of a driving licence racket involving politicians—who had his contract terminated and work permit not renewed (Repeckaite, 2024). Similarly, Likmeta and Voko (2024) argue that the regulatory framework to protect whistleblowers (Law no. 60/2016) in Albania is not effective because it only protects members of private and public sectors reporting cases within the institution or the state-run “High Inspectorate of Declaration and Audit of Assets and Conflict of Interests”. Moreover, a 2023 report from the Institute for Democracy and Mediation revealed that whistleblowers who report on corruption or provide information to the media are exposed to pressure and often refrain from reporting, out of fear that their identity might be disclosed.

3.3 Journalistic profession, standards and protection

*Journalists and other media actors are those who, in a functioning democratic society, feed the public debate and ensure that the public is informed on all matters of public interest. In contributing to the public debate, journalists influence public opinion and, thus, in the end, the electoral choices of voters and the accountability of politicians. It is therefore important that, in a democratic society, access to the journalistic profession is not limited (i.e., subject to licensing schemes); and journalists can act independently of political and commercial interests and rely on an “enabling environment” in which to carry out their job. In this regard, the European Court of Human Rights (ECtHR) sets the standards. The Court has stressed, in its case law, that countries have positive obligations to “create a favourable environment for participation in public debate by all persons concerned, enabling them to express their opinions and ideas without fear” (CoE, 2016; ECtHR case *Dink v. Turkey*, 2668/07, 6102/08, 30079/08, 7072/09 et 7124/09).*

This also means that the countries have a duty to guarantee a safe environment in which journalists, and other media actors, can exercise their watchdog function. The journalistic profession, standards and protection indicator deals with a range of different aspects that touch upon journalists and journalism. The indicator is composed of seven sub-indicators, which describe the risks resulting from: (i) working conditions; (ii) physical safety; (iii) life safety; (iv) digital safety; (v) positive obligations to protect journalists from strategic lawsuits against public participation (SLAPPs), and other legal threats; (vi) the existence and levels of the implementation of those rules on the protection of journalistic sources; and, (vii) the existence and levels of the implementation of rules on privacy and data protection.

MPM2024 also continues to assess the status of journalists based on a variable that considers arbitrary arrests and the imprisonment of journalists as a result of them exercising their profession (whether there are, for instance, politically motivated arrests/detentions and imprisonments of journalists) and cases of severe threats to the lives of journalists, including physical threats, physical harm, and assassination. MPM2024 also provides an additional focus on threats to women journalists, both off- and online.

Figure 3.3.a. Indicator on the Journalistic profession, standards, and protection - map of risks per country

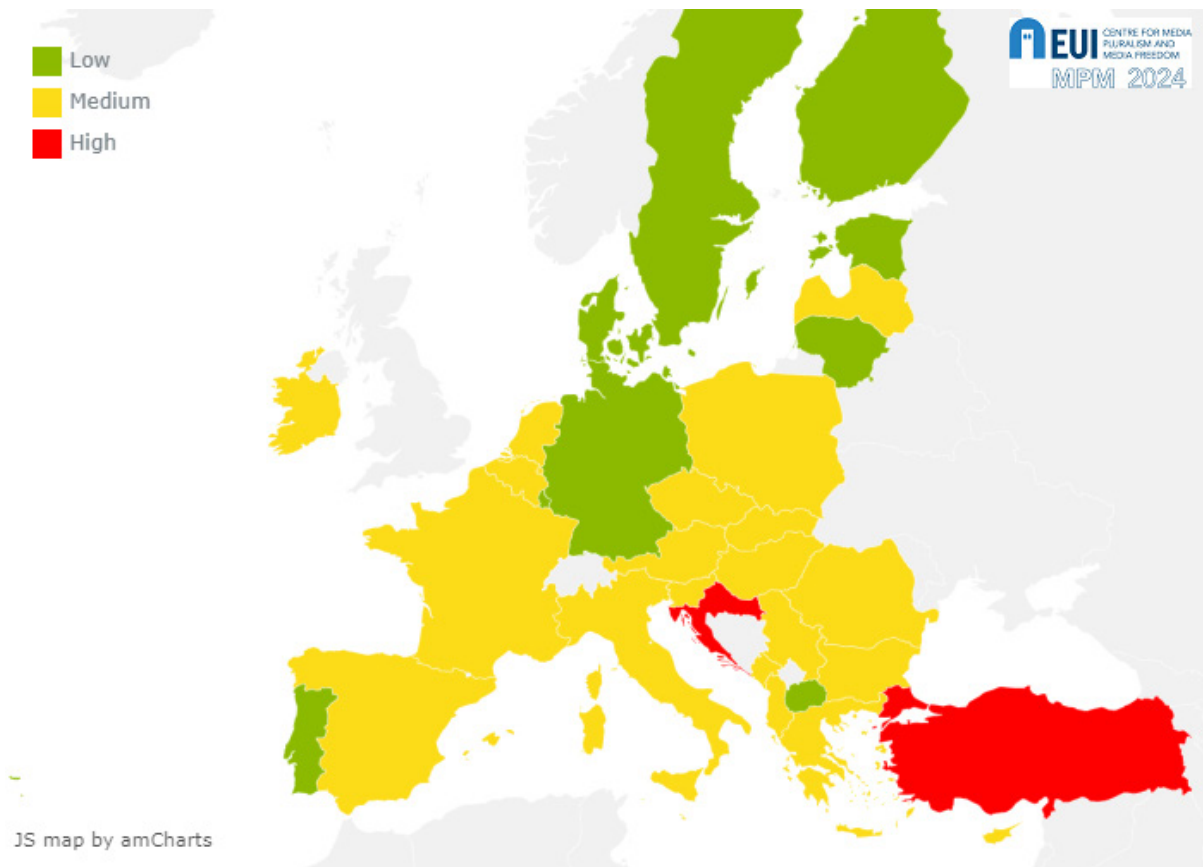
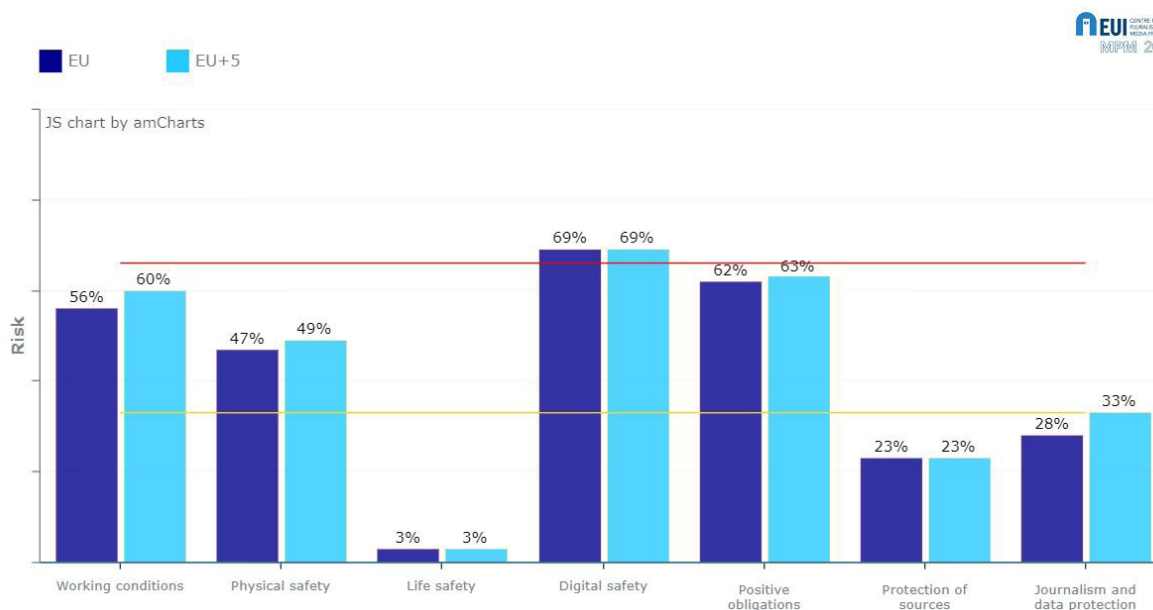


Figure 3.3.b. Indicator on the Journalistic Profession, standards and protection - averages per sub-indicator



The indicator **Journalistic profession, standards and protection** defines the necessary conditions that must be safeguarded so that journalists are able to work freely, with dignity, and without fear. Poor working conditions, attacks against journalists in the online environment, and governments not fulfilling their positive obligations towards the media, remain the most pressing issues within this indicator.

In MPM2024, it scored as a medium-risk at 43%, consistent with the last two years. It constitutes the indicator at highest risk within the Fundamental Protection area.

In MPM2024, Turkey (69%), and Croatia (68%), remained as high-risk countries. Greece (63%) improved its ranking from being a high to medium-risk country. Nine countries are in the low-risk band: Denmark, Estonia, Finland, Germany, Lithuania, Luxembourg, Portugal, Sweden, and the Republic of North Macedonia. Estonia, Sweden, and North Macedonia are new to this list, having decreased their risk from medium to low. Conversely, Austria, Cyprus and, particularly, Slovakia (from 28 to 40%), moved from the low to the medium-risk band.

With regard to Slovakia, among other reasons for this risk increase are the frequent attacks and intimidations suffered by journalists from different actors, including prominent politicians (Urbániková, 2024). For Latvia, even if the country remains in the medium-risk band, the risk increased significantly, from 40 to 51%. This is mainly due to “the constant threats and attacks directed against journalists, especially women, in the online environment, the absence of SLAPP monitoring, and the problems that arose when it was

publicly discussed that a spyware program was found on journalists' phones" (Rožukalne & Skulte, 2024). The risk decrease for Turkey from 83% last year to 69% this year is due to the absence of killings of journalists in the country in 2023.

One of the sub-indicators comprising the Journalistic profession indicator is the investigation into the journalists' *Working conditions*, which scored at a medium (tending to high) risk of 60%. Decent working conditions are essential, as they protect journalists from political and business influences and discourage censorship and self-censorship. Within this sub-indicator, like last year, only Denmark, Germany, Ireland and Sweden scored as low risk, while 15 of the countries assessed scored as being at the medium-risk level (Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Lithuania, Luxembourg, Malta, Poland, Portugal, Slovakia, Slovenia, Spain and the Netherlands), while 13 scored as being at high risk (Albania, Austria, Croatia, Greece, Hungary, Italy, Latvia, Montenegro, Romania, Serbia, the Czech Republic, the Republic of North Macedonia and Turkey). Among the countries that scored high risk, Croatia, Montenegro, and Romania scored 97%, which is the highest possible level of risk used in the MPM methodology. It is worth noting the very high number of high-risk countries for this sub-indicator, when compared to the other questions under analysis in the MPM.

The issues in high-risk countries are diverse. One of the structural causes for deteriorating working conditions is a generalised media crisis, following recent breaking events like the Covid-19 pandemic and the war in Ukraine, especially if paired with a small national market, as in the cases of Portugal (Cádima et al., 2024) or Latvia (Rožukalne & Skulte, 2024).

Particularly difficult working conditions are faced by local and regional journalists, receiving lower salaries and more fragile or absent social security schemes, as reported in virtually all the Member States and candidate countries in MPM2024, and by the Local Media for Democracy study (Verza et al., 2024). A more precarious situation is also faced by freelancers and young journalists. In France, unions have denounced the "uberization" of young journalists, and media outlets resorting to the multiplication of short-term contracts, self-employment, payment in author rights, internships (Ouakrat & Sklower, 2024). In addition, journalistic organisations are not always effective in defending the rights of the profession: in particular, the low popularity of journalistic associations in post-communist EU Member States and candidate countries makes bargaining for better working conditions more difficult. Institutions are also not active in addressing the precariousness of the profession: in Italy, for example, the expiration of the primary collective contract for journalists (FIEG-FNSI) in 2016, yet to be renewed, underscores institutional neglect. As highlighted in the Italian report, "these circumstances heighten journalists' vulnerability to external influences such as commercial or political pressures, particularly in the absence of robust safeguards and certainty" (Vigevani et al., 2024).

Life safety is an MPM sub-indicator assessing whether journalists were killed in relation to the exercise of their journalistic profession in a given year. The perceived risk of death linked to investigative reporting may of course discourage journalists from taking up investigations on corruption or other sensitive topics.

The database that is maintained by the Committee to Protect Journalists shows that, in the past ten years, 17 journalists have been killed in the EU Member States. After the murders of the Maltese investigative journalist, Daphne Caruana Galizia, in 2017, the Slovak investigative journalist, Ján Kuciak, and his partner in 2018, the killing of Lyra McKee in Northern Ireland, in 2019, the murders of Giorgos Karaivaz in Greece, Peter R. de Vries in the Netherlands, and Hazım Özsu in Turkey, in 2021, one journalist was killed in Europe in 2022. Güngör Arslan, the publisher and chief editor of the local Turkish news portal *Ses Kocaeli*, died as a result of an armed attack in February 2022. In 2023, the killing of journalists took place in Ukraine, among them the French AFP journalist, Arman Soldin. It is also worth mentioning the ongoing impunity related to the perpetrators of crimes against journalists in Greece, especially in relation to the killing of journalist George Karaivaz, who was assassinated in April 2021; despite the arrests of two suspects, middlemen and masterminds have not been arrested and no convictions have been secured (Papadopoulou & Angelou, 2024). The same climate of impunity can be reported in Malta (Repeckaite, 2024).

Physical safety is another sub-indicator that is fundamental to the evaluation of preconditions for free journalism. The sub-indicator covers physical threats and arbitrary imprisonment. According to the Platform to Promote the Protection of Journalism and the Safety of Journalists of the Council of Europe, 221 (against 173 last year) cases of harassment and intimidation of journalists and the media were reported within the timeframe of the MPM2024 analysis.

In MPM2024, this sub-indicator still scores in the medium-risk range (49%). Within this sub-indicator, 15 countries scored as being at low risk (Austria, Cyprus, Denmark, Estonia, Finland, Hungary, Ireland, Lithuania, Luxembourg, Malta, Montenegro, Portugal, Romania, the Czech Republic, and the Republic of North Macedonia). Nine countries scored as being at medium-risk (Albania, Belgium, Croatia, Germany, Italy, Latvia, Slovakia, Slovenia, and Sweden), and eight (three more than last year) scored as being at high risk (Bulgaria, France, Greece, Poland, Spain, Serbia, the Netherlands, and Turkey).

Attacks and intimidation sometimes come from top level politicians: in Slovakia, for example, the risk score for this sub-indicator significantly increased this year (moving from low to medium-risk, and on the verge of high risk, at 66%), given a continuous trend of this kind of intimidations (Urbaniková, 2024). In November 2023, Prime Minister

Robert Fico attacked four major media outlets—*TV Markíza*, the dailies *Sme* and *Denník N*, and the online outlet *Aktuality.sk*—labelling them as enemies and hostile media. According to a survey conducted by the Investigative Center of Ján Kuciak (ICJK), two out of three Slovak journalists experienced a threat or intimidation in the preceding 12 months and 4% experienced a physical attack (ICJK, 2023, cited in Urbaniková, 2024). In Latvia, “journalists have regularly admitted in public interviews that certain politicians attempted regular attacks on journalists by perceiving that during the war [in Ukraine], professional journalism shall represent the state’s and/or actual political position, rather than trying to provide professional content and diversity of opinions. These attacks by politicians and politically involved users of social networking platforms have created risks of self-censorship, increased hatred against journalists, and harmed the diversity of content” (Rožukalne & Skulte, 2024).

In addition to assessing the overall safety of journalists, the MPM accounts for the physical and online safety of women journalists through separate variables. By doing so, the MPM acknowledges that violence against women journalists is a self-standing issue and needs to be assessed as such (Žuffova, 2023). In particular, the threats and attacks in the online environment hold significance (73%), scoring a high risk in more than half of the countries under analysis (17 countries). This issue discourages women journalists from covering politics, or even from staying in the profession, which has serious repercussions for journalism’s practice and women’s representation in the profession and in the society. The MPM data collection repeatedly points to national governments’ failure to understand the extent of the issue, hindering their ability to tackle it, as they do not collect gender-disaggregated data on the attacks against journalists. A best practice in this regard comes from the Netherlands, where the *Persveilig.nl* platform (established by the media sector, the police and the Prosecutor’s Office) has delved deeper into the specific threats against women journalists and is offering more tailored help based on such conclusions (De Swert et al., 2024). In many cases throughout Europe, however, systematised data on violence against journalists are lacking. Moreover, journalists tend not to report attacks and threats because they consider them “part of the job” or do not have trust in their national criminal justice system, among other reasons.

As reported by the MPM Spanish researchers (Suau-Martinez et al., 2024), in 2023 several Spanish journalists were arrested while doing their job. On 15 November 2023, two journalists of *El Mundo* and *El Español* were detained by police while covering a protest against the “amnesty” for Catalan separatists in front of the Spanish Socialist Workers’ Party (PSOE) headquarters in Madrid; and on 28 May 2023, two plain-clothes National Police officers violently detained the photojournalist Rodrigo Mínguez, who works for the daily *El Salto*, after he attempted to interview the leader of the far-right political party *Vox*, Santiago Abascal.

In addition to the reported arrests, and according to the Mapping Media Freedom website, 13 journalists were victims of attacks or of threats to their physical safety during 2023. Still, according to the same source, most of them took place during protests in Madrid against the ruling party PSOE.

Threats to journalists' physical safety also took place in the Netherlands. As reported by the MPM Dutch researchers (De Swert et al., 2024), there was again a substantial number of attacks or threats against the physical safety of journalists in 2023 (218 incidents compared to 198 the year before) (PersVeilig, 2023, cited in De Swert et al., 2024). Also in 2023, discussions on the arrests of journalists continued in the Netherlands, mostly (again) in the context of climate activism. In January 2023, two journalists from the newspaper *Volkskrant* were arrested and fined while they were reporting among a group of climate protesters blocking a highway (Stoffelen, 2023 cited in De Swert et al., 2024).

According to the Journalists Union of Turkey (TGS), there were 14 journalists in prison by the end of 2023 and the first days of 2024. A prominent investigative journalist, Tolga Şardan, a columnist for the T24 news portal, was arrested for "spreading disinformation" (217/A) after he reported on a "judicial report" allegedly presented by the country's intelligence agency to the presidency. According to data from the TGS, 32 journalists have been investigated under the controversial amendment in the Turkish penal code about spreading disinformation since the law was passed in 2022 (Inceoğlu et al., 2024).

Other specific threats occurring in the online environment, including those that appear through the illegitimate surveillance of journalists' searches and online activities, their email or social media profiles, hacking and other attacks by state or non-state actors, are discussed under the sub-indicator *Digital safety*.

Threats of violence, which are typically made online, have become increasingly common in recent years, and the MPM2024 confirms the trend, as the sub-indicator, *Digital safety*, scored as a high risk, at 69%. As can be seen below (Figure 3.3.d), half of the countries under study scored a high risk in this regard.

As public figures, journalists are often targeted, or they are subjected to hate speech, implicitly or explicitly threatened with violence, and they are subjected to surveillance, email hacking, DoS attacks, cyberbullying, and public threats on social media platforms or via their private email and messages. In some cases, the attacks against journalists appear to be organised: individual journalists are singled out online, and, in some cases, they are repeatedly attacked over an extended period, even by means such as violent tags and bots. A quantitatively large proportion of the abuse is connected to politics.

Online abuse against journalists has been on the rise in many of the countries assessed. Some do not collect disaggregated data on the issue, so it is difficult to assess its full extent. However, those countries that collect and publish the data clearly show a negative trend. Figure 3.3.c. demonstrates that presently digital safety constitutes a much more significant issue than physical safety, in Europe.

In Germany, the state is planning a legal remedy against this so-called “digital violence”, which will make it possible to take more effective action against hate crime online, for example by blocking accounts; however, at the time of writing the MPM reports, only "key points" were available (BMJ, 2023 quoted in Kalbhenn, 2024). The law is intended, for example, to structure private information procedures in such a way that those affected by digital violence can find out who wrote the content within a few days in the event of an obvious violation of the law, such as death threats. In all other cases, the court should at least be able to order data storage within a few days of the information procedure being initiated (Kalbhenn, 2024).

Figure 3.3.c. Physical safety of journalists (left) vs. digital safety of journalists (right)

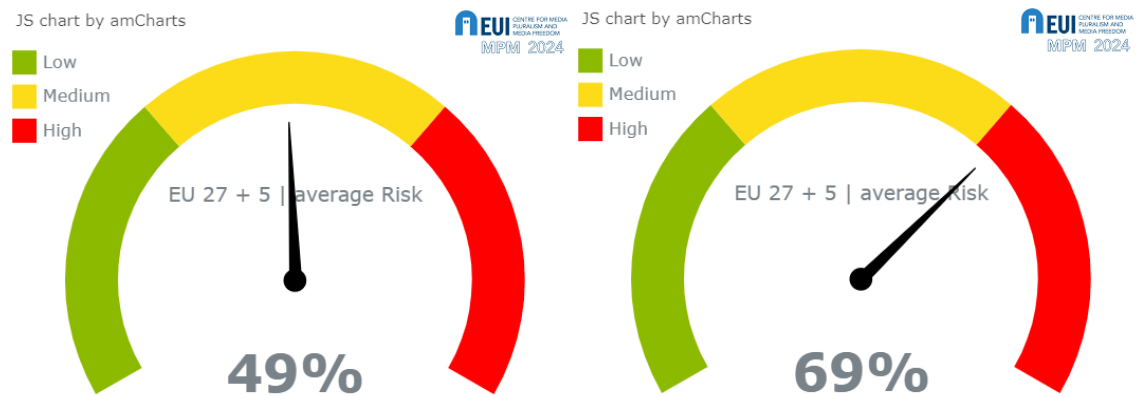
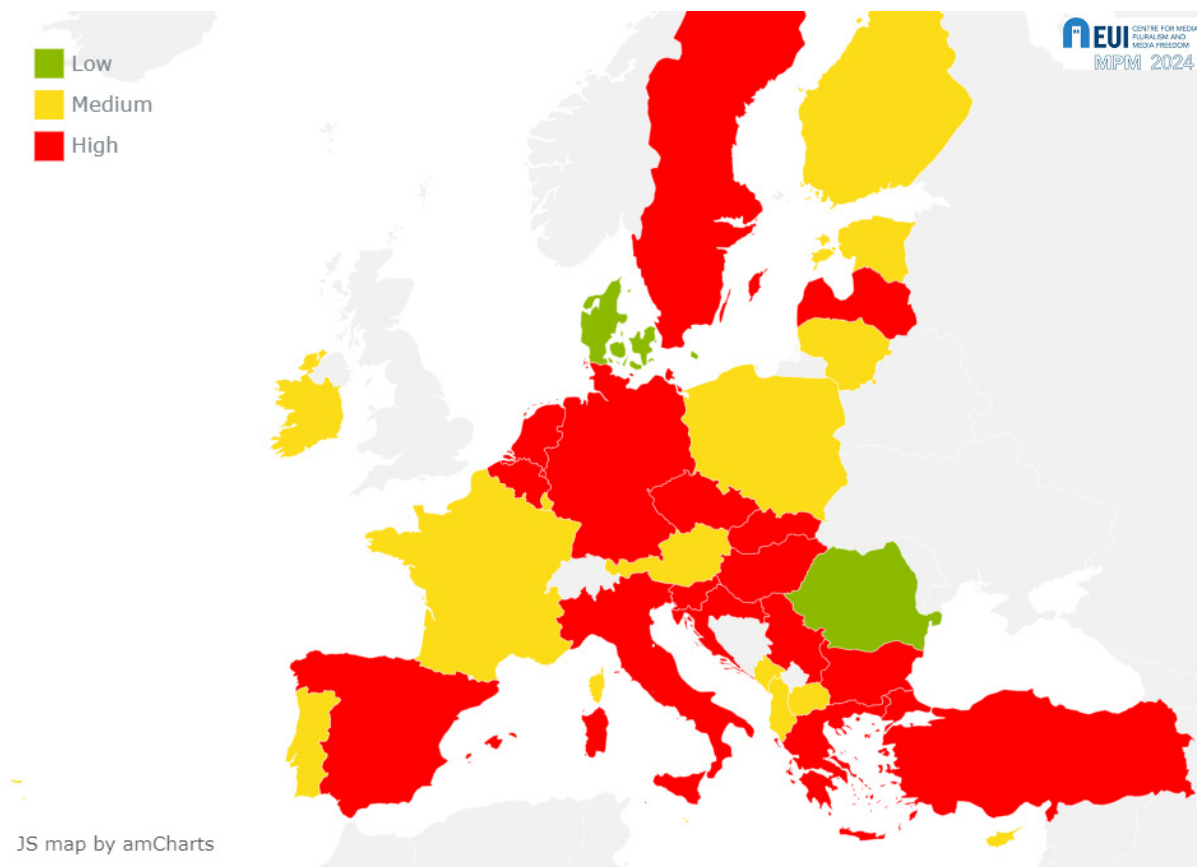


Figure 3.3.d. Digital safety of journalists



Under the sub-indicator on *Positive obligations*, the MPM investigates whether the countries that have been assessed are putting in place all the necessary measures to guarantee an enabling environment for journalism.

In particular, the sub-indicator on *Positive obligations* assessed the extent of impunity (whether perpetrators of crimes against journalists are prosecuted), the existence of a legal framework against strategic lawsuits against public participation (SLAPPs), and the occurrence of SLAPP cases. SLAPPs are vexatious lawsuits, usually asking for a disproportionate amount of damages so as to intimidate and eventually silence journalists. In April 2024, the EU anti- SLAPP Directive 2024/1069²³ (often called the “Daphne law”) was enacted; it stems from the April 2022 Proposal of the European Commission. All the EU Member States will need to transpose it to their national legal framework, but the scope of the Directive is limited to cross-border civil proceedings.

23 DIRECTIVE (EU) 2024/1069 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (‘Strategic lawsuits against public participation’) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024L1069>.

It includes an explicit rule on the burden of proof, which makes it clear that the claimant, and not the defendant, must prove facts they raise before the court. Also, following Parliament's request, Member States will have to provide information for SLAPP victims, as well as publish judgments of the highest courts in SLAPP cases in an electronic format.

In the MPM2024, the sub-indicator *Positive obligations*, scored as a medium (tending to high) risk (63%). Within this sub-indicator, 14 countries scored as being at high risk: Albania, Belgium, Bulgaria, Croatia, Estonia, Greece, Hungary, Latvia, Italy, Malta, Poland, Serbia, Spain, Slovenia, and Turkey. Among them, Belgium shifted from medium to high risk (75%) as well as Spain (83%) and Latvia (83%). Twelve countries scored at medium-risk, namely, Austria, Cyprus, France, Ireland, Lithuania, Luxembourg, Romania, Slovakia, Spain, the Czech Republic, the Netherlands, and the Republic of North Macedonia. Only six countries scored as being at low risk: Denmark, Finland, Germany, Montenegro, Portugal, and Sweden.

In 2023, there was no country that had already adopted an anti-SLAPP legal framework. However, some of the countries assessed have legal provisions that can prevent SLAPPs. For instance, the existing Danish legislation is deemed sufficient to deal with SLAPPs if filed (Simonsen, 2024).

The 2023 report of the Coalition Against SLAPPs in Europe (CASE), points out that the majority of the vexatious lawsuits are based on national defamation laws. In Poland, for example, Grzegorz Kosiński, the former publisher and editor-in-chief of the satirical website Czarna Owieczka.pl, was convicted of criminal defamation (Article 212.2) for ridiculing a Member of Parliament (CoE, 2023 cited in Klimkiewicz, 2024). However, reckless lawsuits could be brought in defence of other interests. In France, for example, numerous SLAPP cases against media companies and journalists have been put forward in the name of the defence of trade secrets. A comprehensive list can be found in the MPM2024 report by Ouakrat and Sklower. In Hungary, there are some high-profile cases building on the General Data Protection Regulation. Court cases or administrative procedures for data protection are initiated at the National Authority for Data Protection (NAIH) by wealthy individuals, arguing that journalists were misusing their personal data when writing about their business interests (Bleyer-Simon et al., 2024). The Hungarian Civil Liberties Union (HCLU) turned to the European Court of Human Rights in relation to a number of GDPR related cases (Döbrentey et al. 2024 cited in Bleyer-Simon et al., 2024).

It is worth mentioning the alarming situation of SLAPPs in Croatia: according to a survey conducted by the Croatian Journalists Association (HND), in May 2023 there were 945 active lawsuits against journalists, 910 of which relate to defamation charges (HND, 2023, cited in Bilić and Petričusić, 2024). Albania, Italy and Greece also appear to be in a particularly critical situation. In Italy, there is a worrying trend of increasing criminal and civil lawsuits against journalists, including by government members (Vigevani et al., 2024).

The sub-indicator *Protection of sources*, scored as a low risk (23%) similar to the score in the previous MPM edition, with ten countries scoring a medium-risk (Albania, Bulgaria, Estonia, France, Ireland, Italy, Montenegro, Poland, Spain, and the Netherlands) and only Greece scoring at high risk. In Greece, journalists are not expressly covered by Article 212 of the Code of Penal Procedure, which safeguards the professional confidence of a few professionals (doctors, lawyers, etc.). As witnesses in criminal proceedings, they thus do not have the right to refuse to answer questions that are related to information obtained during their work. This lack of legal protection, accompanied by cases of suspected surveillance of journalists, creates a high-risk environment for journalistic sources.

The MPM2020 (assessing year 2019) introduced a new sub-indicator that aimed to tackle the impact of data protection and data retention rules on journalistic activity. The processing of personal data is a necessary step towards the proper exercise of the journalistic profession. Requiring journalists to comply fully with data protection rules and principles can have a real impact on their freedom of opinion and of expression. Examples might be, for instance, the requirement of the data subject's consent to publish his/her personal information in news articles, or the disclosure of the name of the source who provided information on personal aspects of an individual for journalistic materials. The need for the EU's Member States' laws "to reconcile the rules governing freedom of expression and information, including journalistic, academic, artistic and or literary expression, with the right to the protection of personal data" is recognised in Recital 153 of the GDPR.

The sub-indicator *Journalism and data protection* scored an average of 33%, the same as in MPM2023. The majority of assessed countries (21) scored as being at low risk, seven countries scored a medium-risk (Bulgaria, Cyprus, Estonia, Hungary, Italy, Romania, and Serbia), and four scored as being at high risk (Albania, Croatia, Montenegro, and Turkey). When compared to MPM2023, the only difference in the disposition of countries across the risk bands is Poland, which decreased its risk score from 50% to 33%, moving from the medium to the low-risk range. As reported in the Polish data collection, the risk decrease is explained by the initiative announced by the new government (Civic Coalition) in its electoral programme that it will submit applications to the prosecutor's office to hold criminally liable those responsible for the illegal purchase and surveillance of citizens with the Pegasus software.

The other two variables which make up this sub-indicator seek to evaluate whether the implementation or transposition of two EU instruments, GDPR and Directive 2016/680, has been concluded in such a way that they prevent the illegal monitoring of journalists and ensure a proper balance between data protection and freedom of expression. Regarding the variable on the implementation of measures that prevent the illegal monitoring of journalists, at the national level, ten countries scored as being at medium-risk (Austria, Bulgaria, France, Greece, Italy, Poland, Portugal, Romania, Serbia, and Sweden). Seven scored as high risk (Croatia, Cyprus, Estonia, Hungary, Latvia, Montenegro, and Turkey). In relation to this variable, for instance, Ouakrat and Sklower (2024) report that, in November 2023, the French Constitutional Council blocked the provision of Law n. 2023-1059 (Justice Orientation and Programming Law), which would have enabled the police to spy and remotely access and activate connected devices (phones, computers, tablets, cars, etc.) owned by suspected terrorists, organised criminals, and specific types of delinquents. Concerning the last variable in this sub-indicator, which assesses the implementation of the GDPR derogation on freedom of expression and journalistic activities, the majority of countries scored as being low risk (21). The only relevant novelty from this year's data collection comes from Slovenia, whose Data Protection Act (ZVOP-2), implementing certain aspects of the GDPR, entered into force in January 2023 (Milosavljević & Biljak-Gerjevič, 2024). It remains to be seen how the provisions of Article 4 EMFA, prohibiting to some extent the use of intrusive surveillance software and other forms of surveillance against journalists, will be enforced in national law.

3.4 Independence and effectiveness of the media authority

Media authorities are key actors in regulating the media in Europe, and they are increasingly becoming relevant in facilitating shared policy actions on content moderation online. The indicator on the independence and effectiveness of the media authority looks into whether the appointment procedures guarantee the authority's independence and whether it is, in practice, independent; whether the allocation of budgetary resources protects the authorities from coercive budgetary pressures and allows them to perform their functions freely; the types of powers and appeal mechanisms which are in place with regard to the authorities' decisions; and the transparency and accountability of their actions. On a methodological note, the MPM considers a media authority to be a public body which upholds the rules that are formulated in media acts and laws (and which implements the Audio-visual Media Services Directive (AVMSD)) and/or oversees the media market. The MPM methodology considers and assesses the national authorities that are members of the European Regulators' Group for Audio-Visual Media Services (ERGA) or of the European Platform of Regulatory Authorities (EPRA).

It is important to stress that the recently approved European regulations relevant in the media context, the Digital Services Act (DSA) and the European Media Freedom Act (EMFA), are institutionalising two new boards, respectively the European Board for Digital Services (EBDS) and the European Board for Media Services (EBMS). The former is constituted by the national regulators (so called Digital Services Coordinators) implementing and enforcing the DSA (Art. 61 DSA) (see Jaursch, 2024; Brogi and Nenadic, forthcoming). The latter, instead, will essentially substitute the European Regulators' Group for Audio-Visual Media Services (ERGA), though its competences have been extended including cooperation and mutual assistance between NRAs (Articles 8 - 16 EMFA) (see Brogi&Nenadic, 2023). Although these boards are still in the process of formation, they are already exerting, and will exert even more, significant influence across all sub-indicators of this indicator. While making few references to the future role of these boards, this MPM report, however, does not capture any change yet.

Figure 3.4.a. Indicator on the Independence and effectiveness of the media authority - map of risks per country

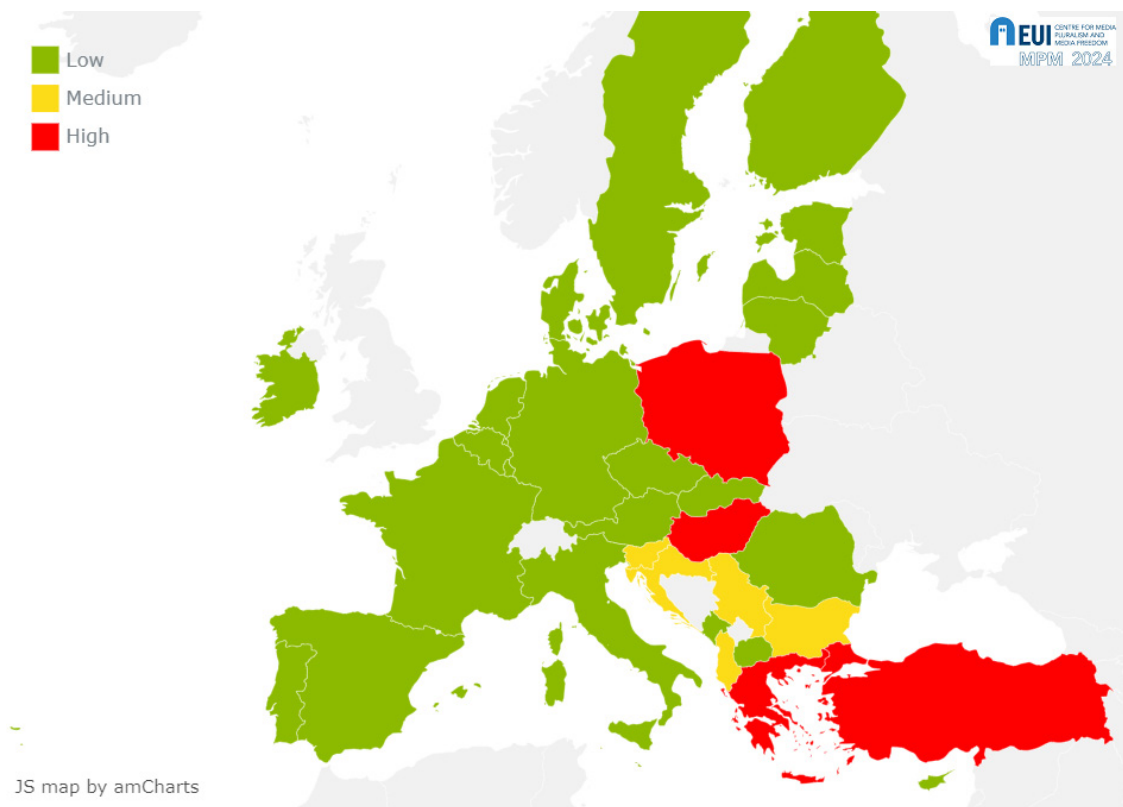
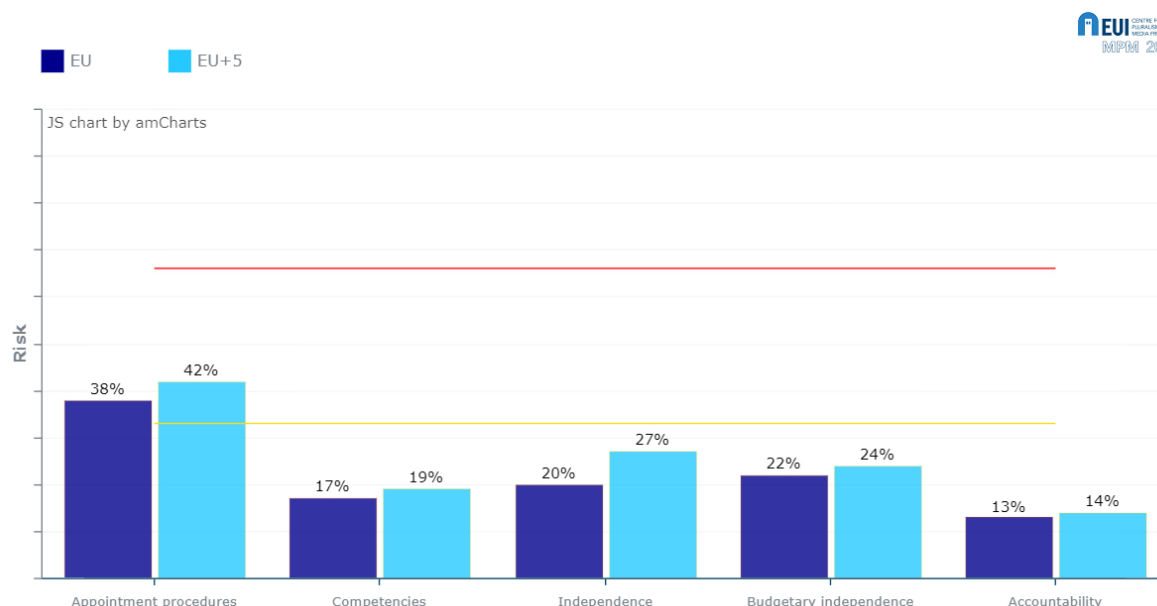


Figure 3.4.b. Indicator on the independence and effectiveness of the media authority - averages per sub-indicator



Media authorities are increasingly becoming key actors in media regulation in Europe and, along with them, the competition and data protection authorities. They can play a role in defining the standards for media policies in a media environment influenced by new digital markets and services. The 2018 revision of the Audio-Visual Media Services Directive (AVMSD) has introduced specific provisions defining the criteria that guarantee the independence of media authorities within the scope of the AVMSD, which is geared towards reinforcing their independence from political and commercial interests. In particular, the reform includes a requirement for Member States to have independent regulatory authorities for audio-visual media services, authorities that should be legally distinct from the executive power and functionally independent of their respective governments, and of any other public or private body. Independent audio-visual media authorities should not be instructed by any other body in relation to the exercise of their tasks, and they should exercise their powers both independently and transparently. The AVMSD lays down that such national regulatory authorities, or bodies, must exercise their powers in accordance with the objectives of the Directive and with the values of media pluralism, cultural and linguistic diversity, consumer protection, accessibility, non-discrimination, internal market, and the promotion of fair competition.

The tasks and competencies of the audio-visual media authorities should be clearly defined in law, and authorities should have adequate resources and enforcement powers, including powers to sanction, in order to carry out their functions effectively. The Member States shall lay down, in law, transparent procedures for the appointment and dismissal of the head of the national regulatory authority or of the members of the collegiate body.

An appeal mechanism against the decision of a regulator at the national level shall also be provided. The criteria listed in the Directive are used by the MPM to assess the independence and effectiveness of the media authorities.

In MPM2024, within the Fundamental Protection area, the **Independence and effectiveness of the media authority** indicator was the only one which remained in the low-risk band, even though it had a slight increase compared to the previous year (by one percentage point, from 25% to 26%). In addition to Hungary, also Poland, Turkey and Greece entered the high-risk band. The latter, in particular, experienced a dramatic increase by 20%, becoming the worst scoring country in this indicator by far (Hungary, Poland and Turkey score 70% compared to 83% of Greece). This change is mainly attributed to the highly controversial procedures employed for the appointment to the board of the main media authority in Greece's broadcasting field, the new National Council for Radio and Television's (ESR), whose procedures seemed to be illegitimate, possibly due to political interference, leading to a request for annulment before the Council of State (Papadopoulou & Angelou, 2024). Five countries scored at medium-risk (Albania, Bulgaria, Croatia, Serbia, Slovenia) whereas the vast majority (23 countries) remained within the low-risk band.

The sub-indicator demonstrating the highest risk was still the one relating to *Appointment procedures*. Even if politically driven appointments do not necessarily mean that an authority will act in line with political pressure, they still pose a risk of interference. This sub-indicator scored at medium-risk (42%), one percentage point more than in the previous MPM edition, confirming the negative trend that can be traced back to 2021. Less than half of the countries assessed (13) scored within the low-risk band (Austria, Belgium, Denmark, Estonia, Finland, France, Germany, Ireland, Lithuania, Montenegro, Sweden, the Czech Republic and the Netherlands). Ten countries scored at medium-risk (Cyprus, Italy, Latvia, Luxembourg, Malta, Portugal, Romania, Slovakia, Spain, and the Republic of North Macedonia) whereas nine countries, the same as the previous MPM edition, scored as being at high risk (Albania, Bulgaria, Croatia, Poland, Serbia, Greece, Hungary, Slovenia, and Turkey). Notably, in Hungary, electing politically independent members of the main regulatory agency, the Media Council, is practically impossible (Bleyer-Simon et al., 2024). Indeed, the government has a two-thirds majority in parliament, so the legal safeguards for independence are also ineffective, due to the selection and appointment procedures and its practices.

Influences from political and economic actors are further captured by the sub-indicator *Independence of the media authority*. For all countries, it scored an average low risk (27%), one percentage point more than in the previous MPM edition. Most of the countries assessed scored in the low-risk band (25 countries). Only one country scored at medium-risk (Croatia), and six countries scored as being at high risk (Albania, Greece,

Hungary, Poland, Serbia, and Turkey). It is important to stress that high risk in these countries is not necessarily linked to direct interference but often manifests implicitly. An example of lack of independence is Poland, where the National Broadcasting Council (KRRiT) is increasingly less independent. There is indeed a lack of regulatory transparency and a centralization and political control of decision-making, which have led to punitive measures against independent broadcasters (Klimkiewicz, 2024). In 2023, the KRRiT Chairman even repeatedly took the decision to control access to KRRiT data and hold undisclosed meetings, which have been deemed unconstitutional (Radkowski, 2023- cited in Klimkiewicz, 2024). This trend is visible also in KRRiT's inaction, notably in its indifference towards politicians' attacks on journalists. The impact of this development should be seen with regard to the forthcoming implementation of the DSA that will indeed extend KRRiT's competences as well as of the EMFA, as the KRRiT's Chair expressed his concern over the Regulation's influence on freedom of speech.

The composition of the media authorities remains problematic and prone to political influence due to the design and/or practice of the appointment procedures in other countries too: in Croatia, Greece, Serbia, and Turkey, to name a few. In Turkey, the Radio and Television Supreme Council (RTÜK) "acts as a government tool to threaten news outlets critical of the government and silence the critical, independent media in Turkey through its punishments" (Inceoğlu et al., 2024, p.12). Similarly, in Serbia the relevant media authority, the Regulatory agency for Electronic Media (REM), has received domestic and international criticism for years and, despite some attempted reforms, seems still to protect mainly the interests of private broadcasters and of the government (Milutinović et al., 2024).

Across the 32 countries evaluated, the *Competencies* sub-indicator scored as low risk (19%). This sub-indicator assesses whether the rights (including effective sanctioning powers) and the obligations of the media regulatory authority are comprehensively defined in the national legislation, and if the media can appeal against the authority's decisions. The competencies of the main media regulatory agencies are formally prescribed in the national legislation in all Member States and candidate countries. Most of the countries assessed (29) were found to be in the low-risk band. Only three countries scored at medium-risk: Hungary, Poland, and Greece. It is important to note, however, that this sub-indicator does not account for extreme cases, such as Turkey, where the media authorities seem to be effective but, as said above, use their sanctioning powers politically to silence media outlets that are critical of the government (Inceoğlu et al., 2024). Furthermore, it should also be noted that some media authorities are being appointed as Digital Services Coordinators (DSCs) under the DSA. By the end of March 2024, 17 authorities have been designated as DSCs: four are media authorities (Austria, Cyprus, Hungary, Ireland), four are competition authorities (Luxembourg, Denmark,

Spain and the Netherlands), eight are regulators of electronic communications, telecommunications, and postal services (Bulgaria, Croatia, Finland, Malta, Portugal, Romania, Sweden, and the Czech Republic) and, finally, Italy designated the AGCOM, which is a converged authority in the communications industry (Brogi and Nenadic, forthcoming). One of the main concerns is the potential overlap of competences as well as the uniform application and effectiveness of the DSA across the EU. In the case of Ireland, a whole new media authority, the Irish New Media Commission (*Coimisiún na Meán*), has been established, hiring up to 160 employees, as compared to the approximately 40 of the Broadcasting Authority (Flynn, 2024). In effect, this can be explained by 11 of the 19 companies identified by the DSA as Very Large Online Platforms (VLOPs) and Very Large Search Engines (VLOSEs) being headquartered in Ireland.

Budgetary pressures are captured through the sub-indicator on *Budgetary independence* which, on average, scored as low risk (24%), showing that regulatory safeguards for their funding allow the authorities to carry out their functions fully and independently and, usually, their budget is adequate to perform their functions. Despite the generally satisfactory situation, there are exemptions. Nine countries scored at medium-risk for this sub-indicator (Bulgaria, Hungary, Latvia, Malta, Portugal, Romania, Serbia, the Republic of North Macedonia and Turkey) and two countries scored as being at high risk: Greece and Slovenia.

Finally, authorities are generally assessed for their transparency about their activities and accountability to the public. Being transparent may include the publication of annual or *ad hoc* reports that are relevant to their work. These aspects are captured in the sub-indicator, *Accountability*, which scored a low risk of 14% in the MPM2024. Twenty-five countries were assessed as being at low risk. Greece and Poland were the only countries to score at the high-risk level. Cyprus, Croatia, Hungary, Serbia, and Turkey scored as being at medium-risk. Compared to the previous edition, improvements in the transparency and accountability of the media authorities, as well as changes in the risk band, have been observed only in Slovenia.

3.5 Universal reach of traditional media and access to the Internet

The aim of the indicator on the Universal reach of traditional media and access to the internet is to describe the risks to pluralism that arise from an insufficient level of access to content distribution platforms. It assesses the risk that stems from any excessively limited traditional TV and radio network coverage, broadband coverage, and access to the internet. The indicator also consists of variables on net neutrality.

Figure 3.5.a. Indicator on the Universal reach of traditional media and access to the internet - map of risks per country

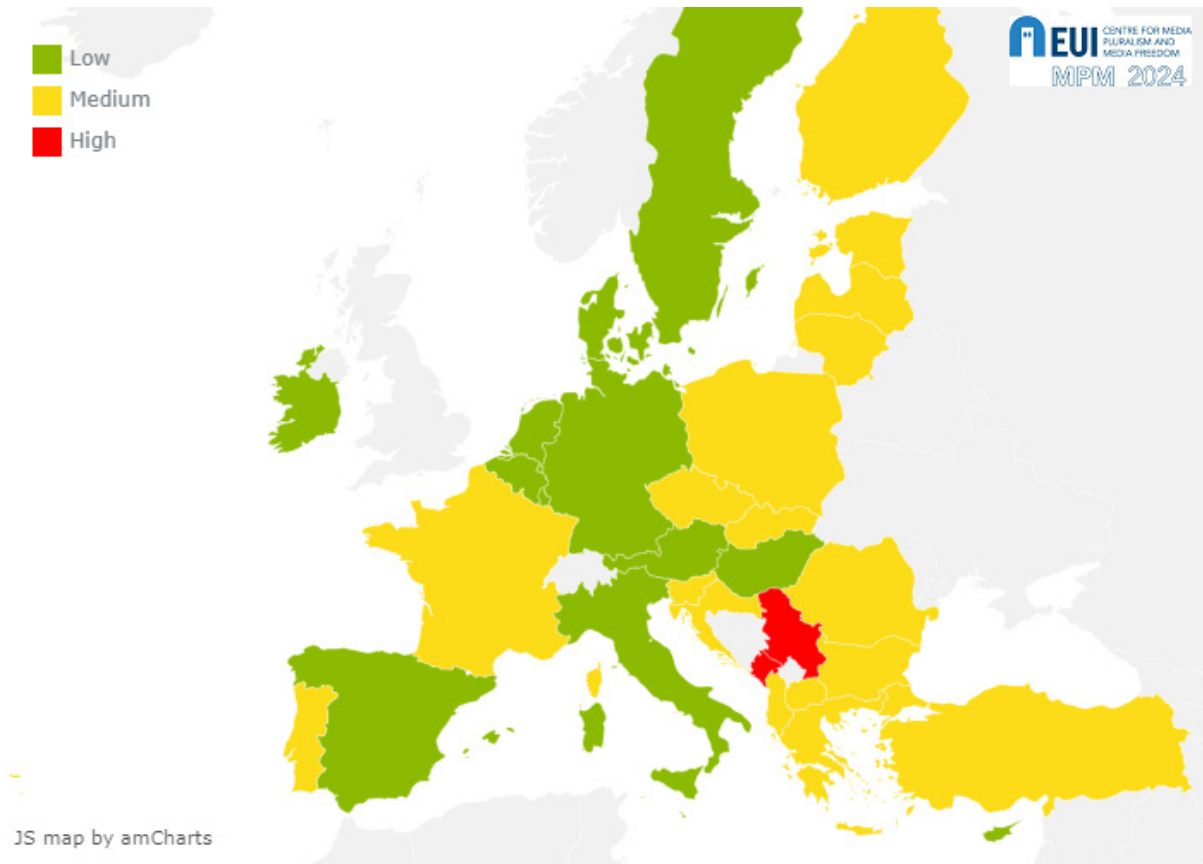
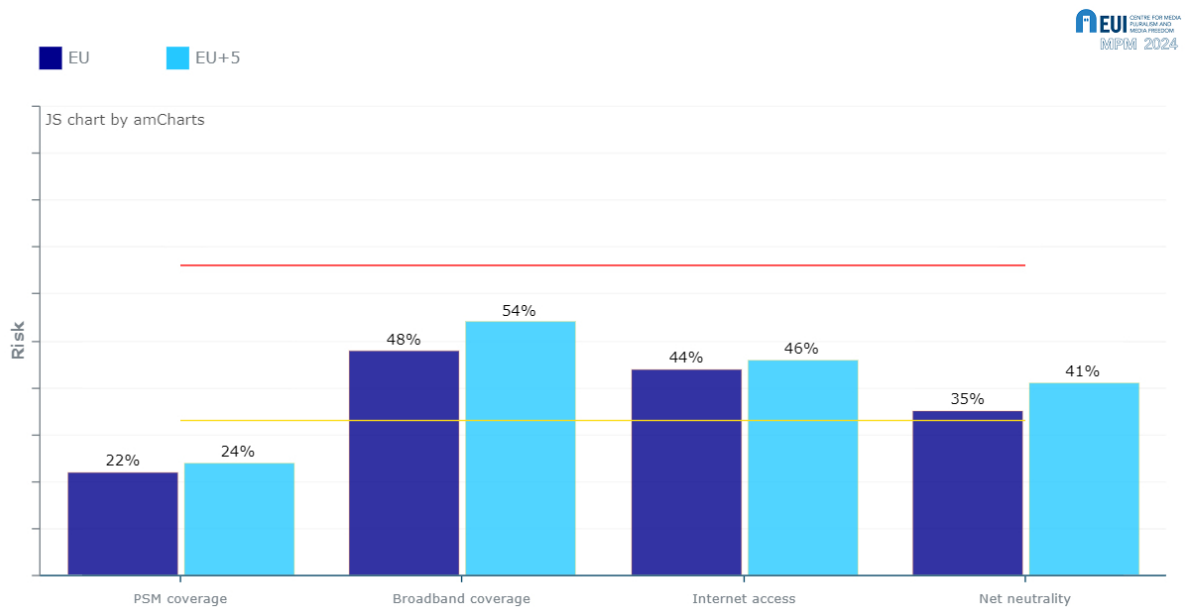


Figure 3.5.b Indicator on the Universal reach of traditional media and access to the internet - averages per sub-indicator



The aggregate risk score for the indicator **Universal reach of traditional media and access to the Internet** is 41% in MPM2024 . However, it should be noted that the shift in the risk score compared to MPM2023 is mainly attributable to methodological changes. Indeed, material shifts in the risk level were confined to the sub-indicators for which there were changes in the data source, namely those pertaining to *Broadband coverage* and *Internet access*. As underlined in Annexe 1 (Methodology), the indicators provided by the European Commission for the Digital Economy and Society Index used for assessing variables 52 and 53 pertaining to internet coverage and access were discontinued. As a result, we opted for data from Eurostat. In particular, Variable 52, which gauges broadband coverage in the population, is now measured using the “isoc_cbt” variable from the Eurostat dataset on broadband internet coverage by technology. Variable 53, which assesses broadband subscriptions, is now measured by the “isoc_ci_in_h” variable from the Eurostat dataset on the level of internet access.

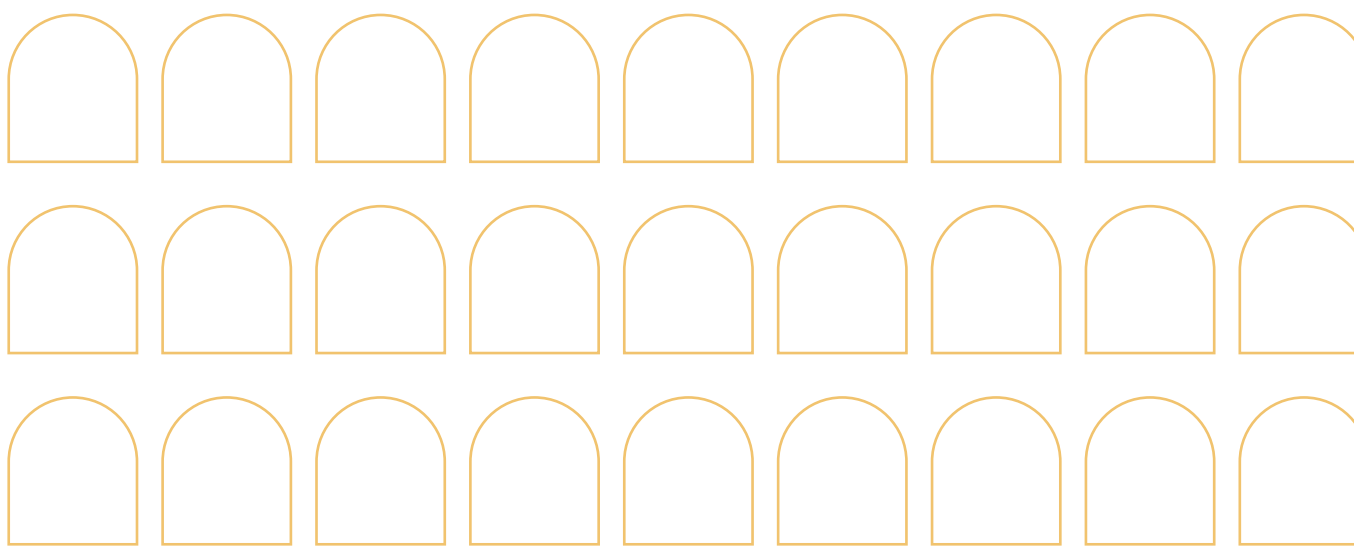
While universal coverage of the PSM is legally guaranteed in every country comprising the MPM, in practice, several countries fall short in this regard. In fact, eleven of the countries assessed scored at the high-risk level (Albania, Bulgaria, France, Greece, Hungary, Latvia, Montenegro, Poland, Slovakia, Slovenia, and Spain) and ten countries scored at the medium-risk level (Croatia, Denmark, Estonia, Italy, Lithuania, Luxembourg, Serbia, The Czech Republic, the Republic of North Macedonia and Turkey). That said, considering the high threshold for assessing the risk levels (Low risk denotes coverage exceeding 99%; Medium-risk indicates coverage ranging between 98% and 99%; and High risk signifies coverage at 98% or less), *PSM coverage* in Europe can be regarded as generally satisfactory. Eleven countries (Austria, Belgium, Cyprus, Finland, Germany, Ireland, Malta, Portugal, Romania, Sweden, the Netherlands) scored at the low-risk level. At the sub-indicator level, in 2023, the *PSM coverage* risk band deteriorated in Latvia and Greece from a low (25%) to medium-risk situation (50%). The worsening situation in Greece was attributed to a lack of evidence that coverage has improved since 2020, when the Hellenic Broadcasting Corporation (ERT) developed its Strategic and Operation Plan (Papadopoulou & Angelou, 2024).

Overall, *Internet access*, which measures the percentage of households having a broadband connection, has increased slightly compared to last year across the countries under examination. However, as highlighted previously, the database used for assessing Internet coverage was discontinued in 2022. As a result, a different dataset was used for MPM2024. It is, therefore, important to proceed with caution when comparing these results with those of the previous year. At the sub-indicator level, eight countries were classified as high risk (Bulgaria, Croatia, Cyprus, Greece, Lithuania, Montenegro, Serbia, and the Czech Republic). Twelve countries fell into the medium-risk category

(Albania, Estonia, Germany, Hungary, Ireland, Italy, Latvia, Poland, Portugal, Slovakia, the Republic of North Macedonia and Turkey) while the remaining twelve countries under assessment fell into the low-risk band.

As a whole, *Broadband coverage*, which assesses the percentage of broadband availability/coverage in the country, has increased slightly compared to last year across the countries under examination. However, as with the *Internet access* sub-indicator, one should exercise caution when comparing the MPM results this year with those of last year because of the change in data sources. Greece experienced the most pronounced decline in the percentage of households with broadband internet coverage from 2021 to 2022, whereas Sweden experienced the most significant increase. At the sub-indicator level, eleven countries scored at the high-risk band (Croatia, Finland, France, Greece, Lithuania, Montenegro, Poland, Serbia, Slovakia, The Republic of North Macedonia, Turkey) and thirteen countries fell in the medium-risk category (Albania, Austria, Bulgaria, Estonia, Germany, Ireland, Latvia, Portugal, Romania, Slovenia, Spain, Sweden, the Czech Republic). The remaining countries (8) received a low-risk score.

Following the approval of Regulation (EU) 2015/2120 on 25 November, 2015, harmonised rules on *Net neutrality* were implemented throughout the EU on 30 April, 2016. As a result, the principle of net neutrality became directly applicable in all 27 EU Member States. Nonetheless, in the relevant sub-indicator, Albania, Montenegro, and Turkey scored at the high-risk level. Italy, Portugal, Romania, Serbia, and Slovenia scored at the medium-risk level. All the remaining countries assessed (24) scored as low risk. Slovenia was the only country whose risk score fell from high to medium-risk. This is because there were no issues reported regarding net neutrality in the country in 2023 (Milosavljević & Biljak-Gerjevič, 2024). The situation regarding net neutrality also improved slightly in Denmark and Latvia. This sub-indicator's analysis also showed that a high concentration of the market shares was in the hands of the top 4 Internet Service Providers (ISPs) in virtually all the countries under assessment. However, this assessment proved challenging in Denmark, Latvia, Slovakia, and the Czech Republic due to the absence of recent market share data in these countries.



4. MARKET PLURALITY

The Market Plurality area considers the economic dimension of media pluralism. Healthy, competitive and open media markets favour external pluralism and the potential flourishing of a diverse media offer; transparency of ownership and editorial independence protect the integrity of newsrooms and the right of their recipients to have access to correct and independent information. The Market Plurality area assesses the risks resulting from the opacity of media ownership, from the concentration of the market in terms of both production and distribution, from the economic sustainability of the media, and the influence of commercial interests and ownership on editorial content. These risks are evaluated and assessed using the 5 indicators of the area:

- *Transparency of media ownership*
- *Plurality of media providers*
- *Plurality of digital markets*
- *Media viability*
- *Editorial independence from commercial and owners influence*

In the Market Plurality area, there are 55 variables: 29 are legal, six are socio-political, and the remainder are economic; ten out of the 20 economic variables require numeric answers.

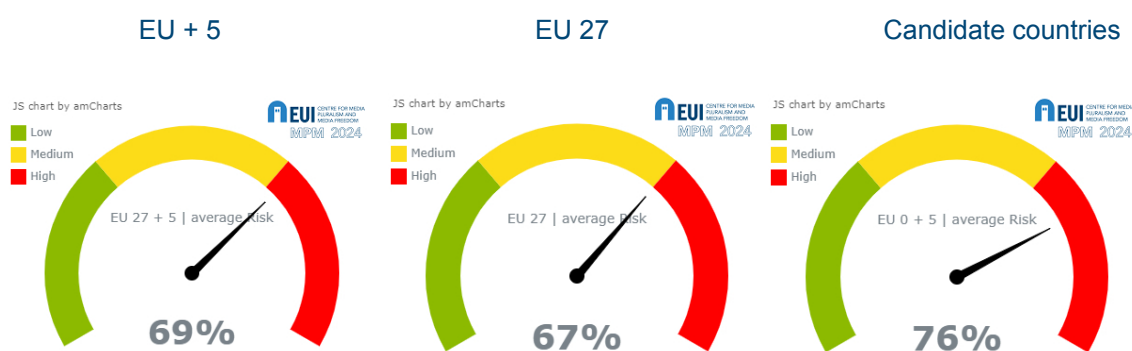
For the sake of assessment in this area, a broad notion of the media is adopted, including those actors producing and disseminating media content (media service providers) and other actors who, even though they do not commonly produce original media content, have an impact on how media content is distributed and accessed, and also influence the financing of the media industry (digital intermediaries, like online platforms and search engines).²⁴ While the first group, including the media content providers, falls

²⁴ This notion of the media is consistent with Recommendation CM/Rec (2018)1 of the Committee of Ministers to the Member States on Media Pluralism and the Transparency of Media Ownership. Council of Europe. 7 March 2018; and with the scope and the definitions set by Regulation (EU) 2024/1083 (European

under the scope of the indicators on Transparency of media ownership, Plurality of media providers, Media viability and Editorial independence from commercial and owner influence, the second group, including online platforms, search engines, and automated aggregators, falls under the scope of the indicator Plurality of digital markets. With this classification, which has been introduced since the first edition of the Monitoring Media Pluralism in the Digital Era (2020) and which has then been updated year-by-year and repeatedly fine-tuned, the MPM aims to better assess the existence and well-functioning of pluralistic and diverse media markets in the present digital environment. To this purpose, the MPM takes into consideration the digital transformation and convergence of the media offer, and the role of digital intermediaries in the access to (and consumption of) information. In comparison with the MPM2023, some changes in the method of measurement of market concentration and the sub-indicators have been introduced; they will be mentioned in the respective parts and explained in the Methodology (see Annexe I).

The **Market Plurality** area scores as high risk at 69%. The risk score is the same as that registered in MPM2023. A comparison with the previous years shows that the result of the Market area has always been the highest across all the areas of the Monitor; it shifted from medium to high risk in MPM2021 (when it scored 69%, registering the shock of the COVID-19 impact on the media markets), to improve slightly in MPM2022 (66%) and then back in the high-risk zone in MPM2023 and in the current implementation.

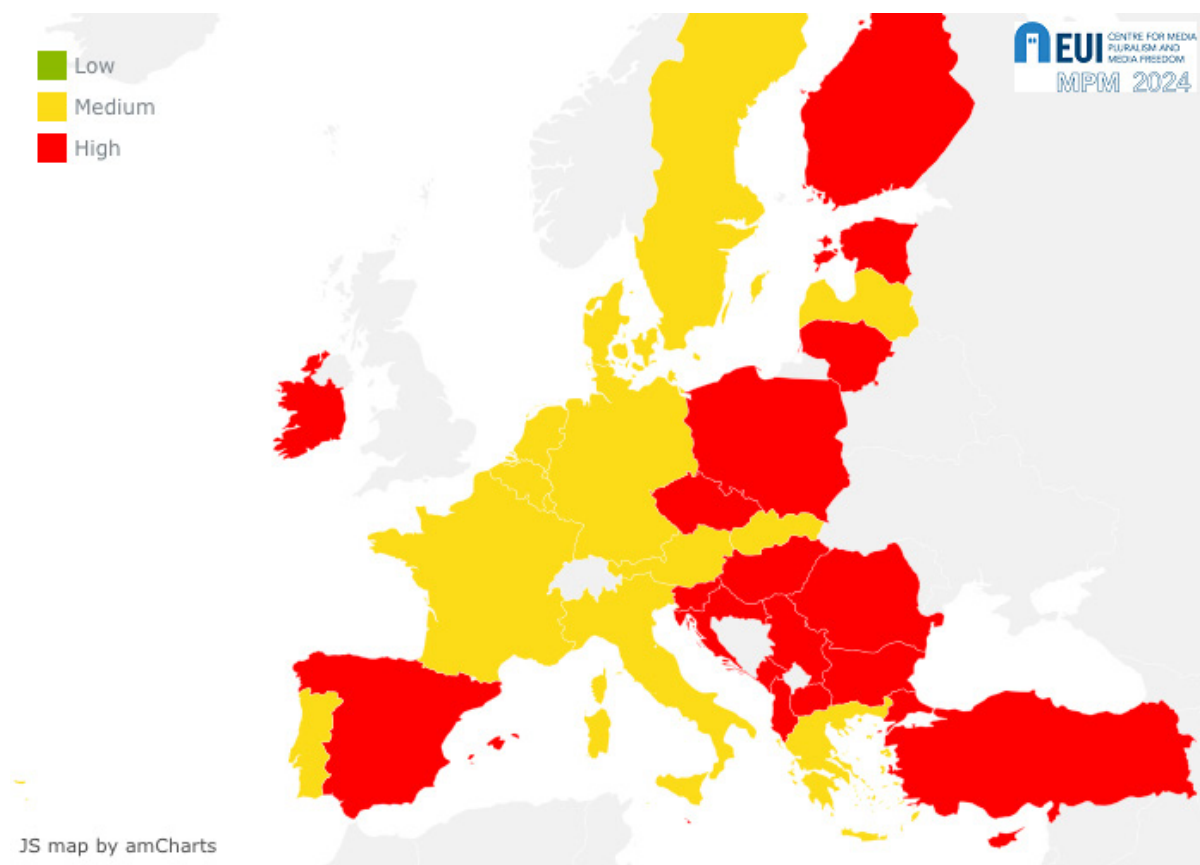
Figure 4.a. Market Plurality area - risk gauges



Media Freedom Act). It is also consistent with the definition embraced by the Study on Media Plurality and Diversity Online, European Commission, Directorate-General for Communications Networks, Content and Technology, (Irion et al., 2022b).

If just the EU Member States are considered, the risk score of the area is 67%, at the lower border of high risk, whereas the average risk score of the five candidate countries is 76%. The candidate countries perform worse in all the indicators but the one on Plurality of media providers, as the EU national media markets tend to be more concentrated (see Figure 4.d).

Figure 4.b. Market Plurality area - map of risks per country

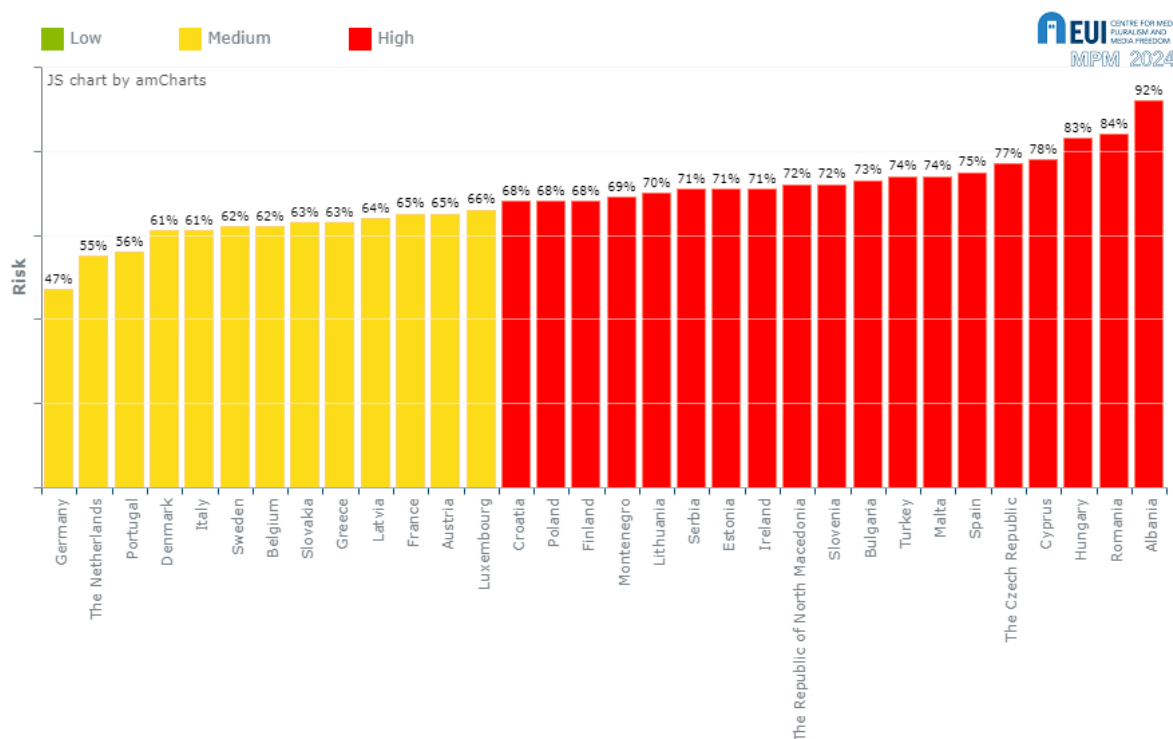


In the **Market Plurality** area, no country is at low risk, 13 countries are at medium risk and 19 countries are at high risk. All the candidate countries score high risk in this area; the high-risk score also prevails in Central-Eastern European countries, and in the Baltic countries (except Latvia). In Western Europe, Spain and Ireland are at high risk.

As pointed out in last year's Media Pluralism Monitor Final Report, in this area, there are no strong differences between the countries. The majority of them crowd around 60-70%. Not only is there no country at low risk, but the lowest risk level is 47% (Germany). This homogeneity can, on the one hand, be surprising, considering, from a comparative perspective, the historical differences among the national media systems (Hallin & Mancini, 2004); on the other hand, it might be understood as a result of the common economic

features of the media markets, with their structural tendency towards concentration, and also of the converging economic trends of revenues in a media market that is more and more unified.

Figure 4.c. Market Plurality area - scores of the risk per country

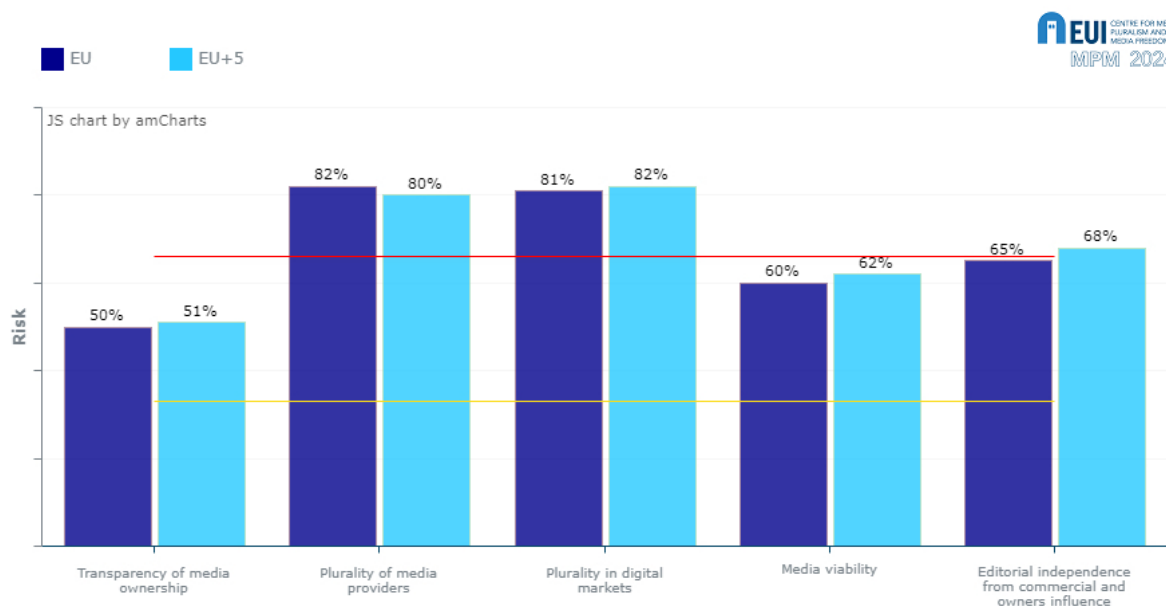


In comparison with the MPM2023, four countries shifted from high to medium-risk (Austria, Belgium, Greece, and Slovakia) and two countries shifted from medium to high risk (Croatia and the Republic of North Macedonia). In the countries that registered a reduction in risk level, the result was for differing reasons: in Austria, Belgium and Slovakia, an improvement in economic conditions is reported, related to advertising revenues, and/or to the development of innovative models of financing, and/or to public service media revenues (Seethaler & Beaufort 2024; Valcke & Wauters 2024; Urbaníková 2024); in Slovakia, the revision of the thresholds of horizontal concentration also impacted the average result (Urbaníková 2024); Greece’s improved score in this area benefits from the implementation of a new law on transparency of media ownership (see below).

The shift in the risk level for Croatia is mainly due to the availability of new data on market concentration and to the worsening economic conditions of the media (Bilić & Petričusić 2024); this is the same in the Republic of North Macedonia, where a decrease in revenue trends and journalistic employment is reported, together with a worrisome risk increase in the indicator measuring the influence of commercial and owners’ interests on editorial

choices (Micevski & Trpevska 2024). It is also worth noting that relevant variations in the risk scores might have occurred without a change in risk level: for example, France remained in the medium-risk zone for Market Plurality but its risk score increased by eleven percentage points, from 54 to 65%, due to the worsening of risks for the indicators of Plurality of digital markets, Media viability, and Editorial independence from commercial and owners' influence (Ouakrat & Sklower 2024).

Figure 4.d. Market Plurality area - averages per indicator



In the **Market Plurality** area, three indicators are at high risk and two are at medium-risk. The indicators at high risk are those assessing the concentration of the markets (**Plurality of media providers** and **Plurality in digital markets**, respectively covering the offer and the distribution of the media content) and the indicator on **Editorial independence from commercial and owners influence**. The latter shifts to the high-risk zone for the first time. This result can be explained by: 1) the increased vulnerability of newsrooms in a hostile economic environment; 2) the recurrence of media owners' involvement in sectors that may pose a conflict of interests; 3) some changes in methodology, which have been introduced to reflect the higher standards set by the EU regulation on the matter of editorial independence (see Annexe I). While the indicator on **Transparency of media ownership** is almost stable, the results of **Media viability** show once again worsening economic conditions for the financing of independent information.

Before entering into the details of the indicators, it must once more be underlined that the data collection for the area of **Market Plurality** presents many difficulties, with a higher incidence of “no data” among the answers in the MPM questionnaire. This phenomenon mainly concerns the questions asking for numeric answers and is related to some degree of opacity in the markets, as well as in some cases to the absence of national systems of official monitoring and lack of reliable and accessible commercial data; other emergencies, related to the problems of audience measurement in the digital environment, contributed to aggravate the risks in recent years. Conversely, the increased cooperation between the MPM teams as well as some flexibility introduced in the period of the evaluation of economic trends (see Methodology in Annexe I) contributed to a reduction in the number of “no data” answers in the MPM2024 for **Market Plurality**, to 10% of the answers in the MPM questionnaire (from 15% in the previous year).

4.1 Transparency of media ownership

Transparency of media ownership is strictly related to the role of the media in the public sphere in a democratic society; it is a precondition of pluralistic and open markets, since it is essential in order to measure, and tackle, the risks that arise from ownership concentration. As the Council of Europe Recommendation on Media Pluralism and Transparency of Media Ownership states, the “transparency of media ownership can help to make media pluralism effective by bringing ownership structures behind the media – which can influence editorial policies – to the awareness of the public and regulatory authorities” (CoE CM/Rec (2018)1). For transparency to be fully effective, the disclosure of media ownership must be provided to public bodies and the public,²⁵ and it must include the information on who is, or are, the ultimate and beneficial owner(s).²⁶ This indicator is composed of seven legal variables and five socio-political variables. The legal variables aim to assess the existence and effectiveness of media-specific laws requiring the disclosure of ownership details, including financial information, in the news media sector. The socio-political variables ask if, in the absence of media-specific rules, the transparency of media ownership information is guaranteed in practice (for example, by applying commercial law, anti-money laundering law, or by other laws or practices). Since the MPM2021, this indicator has separately assessed the risks to transparency in the digital news media sector. Since 2023, two new variables concerning the disclosure of media providers’ financial information have been included in this indicator. Their aim is to understand whether national authorities collect and monitor the financial health and activities of media companies since this can affect the media market as a whole.

25 See Council of Europe Convention on access to public documents, 2009; and the Parliamentary Assembly Recommendation on Increasing access to media ownership, 2015.

26 See the Transparency requirements, para. 4.4-4.7, CM/Rec (2018)/1.

As in the previous year, the indicator on **Transparency of media ownership** scores as being at medium-risk, at 51% in this round of the MPM (EU+5), one percentage point below last year's score. Since 2020 the risk score concerning this indicator has been decreasing due, mostly, to the transposition of the amendments of the 5th Anti-money Laundering Directive (EU 2018/843) and the Audiovisual Media Services Directive (AVMSD). In some countries, such as Greece, the legislation on transparency of media ownership adopted in 2022 entered into force only in 2023, leading thus to a decrease in the risk assessment for this country, which moved from the medium-risk band at 54% in the previous MPM, to the low-risk band at 25% in 2024.²⁷ Some candidate countries, such as the Republic of North Macedonia and Serbia have approved amendments to their media laws in order to align with the EU legislation,²⁸ introducing new transparency provisions for the media sector, but the effect of these laws over the MPM indicator on transparency will possibly be seen only from next year on when these new provisions will be fully in force.

Two other countries presented a considerable risk decrease in the assessment of this indicator: Estonia and Ireland. In both cases, this is due to a reassessment by the country researchers and the CMPF team based on the situation on the ground, and in part to the data provided by the Media Ownership Monitor²⁹ and the Euromedia Ownership Monitor,³⁰ which made publicly available information on media ownership in these countries. In Estonia, the risk score dropped by 22 percentage points, from 60% in the MPM2023 to 38% in MPM2024. Palmer and Žuffová (2024) argue that media ownership information, including those on beneficial owners, is widely available in the country. In the case of Ireland, the risk score dropped by 13 percentage points, from 63% in 2023 to 50% in 2024. According to Flynn (2024), the availability of ownership information of most Irish-facing media firms has improved in the last year.

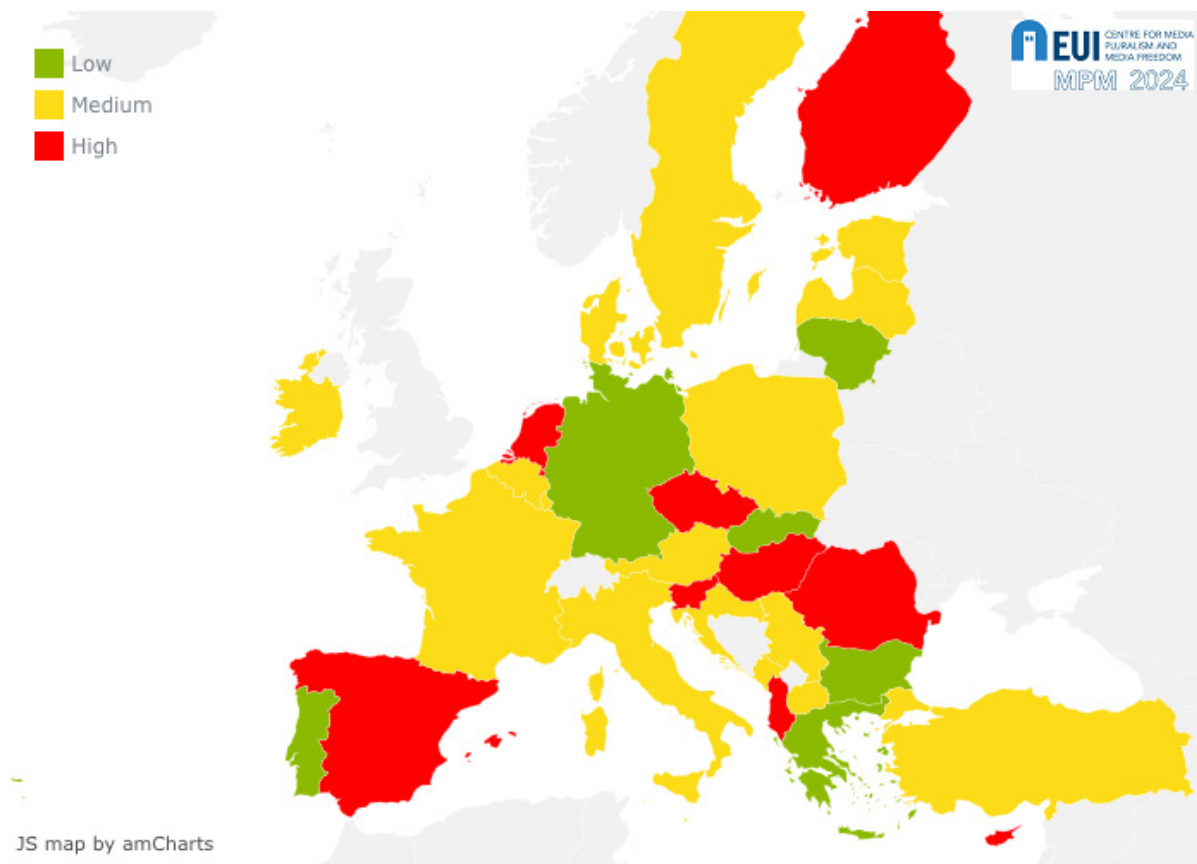
27 Law 5005/2022, published on 21.12.2022, entitled "Enhancing publicity and transparency in the printed and electronic press - Establishment of electronic registers of printed and electronic press - Provisions under the responsibility of the General Secretariat for Communication and Information and other urgent regulations".

28 In the Republic of North Macedonia the Law on Audio and Audiovisual Media Services (LAAMS) was approved in July 2023 aiming to harmonise with the EU AVMSD, but its entry into force is not expected until the second half of 2024. Serbia's new Law on Public Information and Media (Official Gazette RS no. 92/2023) was adopted on 27.10.2023, and entered into force on 4 November 2023.

29 <https://ireland.mom-gmr.org/en/>

30 <https://media-ownership.eu/>

Figure 4.1.a. Transparency of media ownership - map of risks per country

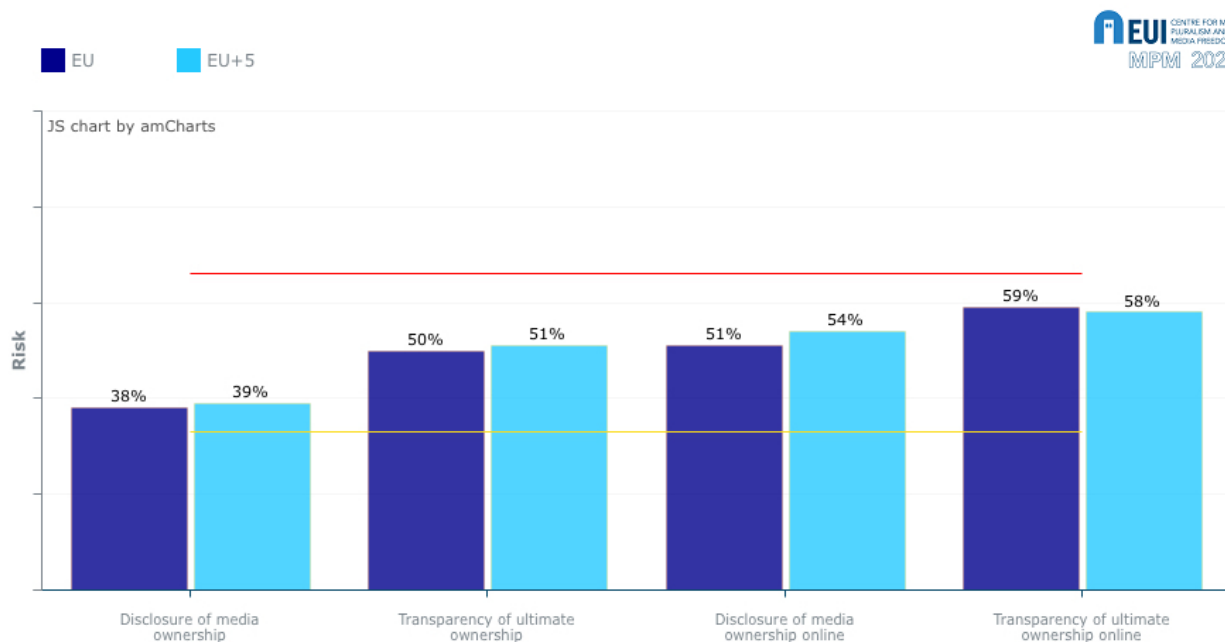


The six countries in the low-risk band this year are Bulgaria, Germany, Greece, Lithuania, Portugal, and Slovakia. The newcomer in this list is Greece; in 2023 the new legislation on transparency in the media sector entered into force (Law 5005/2022), as explained in the previous paragraph, entailing a drop in its risk score by 29 percentage points, from 54% in 2023 to 25% in 2024. The medium-risk range this year consists of the following 17 countries: Austria, Belgium, Croatia, Denmark, Estonia, France, Ireland, Italy, Latvia, Luxembourg, Malta, Montenegro, Poland, Serbia, Sweden, the Republic of North Macedonia, and Turkey. Compared to last year, the list of countries is almost the same, except for Latvia, which moved from the low-risk to the medium-risk band, increasing its risk score from 29% in 2023 to 38% this year. Indeed, Latvia presented a decrease in the risk score between 2022 and 2023 due to legislative changes adopted in 2021, improving the requirements for the disclosure of ownership information. However, according to Rožukalne & Skulte (2024), the Media Ownership Monitor Report 2023 revealed that there are limitations to these requirements, as owners of joint stock companies in the media sector are not required to provide ownership information. Moreover, ownership information on print and native digital media are not available to the public in the same way and under the same conditions as those on broadcasting media.

Therefore, it seems that the legislation adopted in 2021 in Latvia has not effectively improved the availability of media ownership information.

The same nine countries from 2023 feature in the high-risk band in 2024: Albania, Cyprus, Finland, Hungary, Romania, Slovenia, Spain, the Czech Republic, and the Netherlands, with no significant change in their risk scores.

Figure 4.1.b. Transparency of media ownership - averages per sub-indicator



All sub-indicators (*Disclosure of media ownership, Transparency of ultimate ownership, Disclosure of media ownership online and Transparency of ultimate ownership online*) are at the medium-risk level. For the second year in a row, the sub-indicator *Transparency of ultimate ownership online* presents a decrease in the risk score, from 63% (EU+5) in 2023 to 58%. This is indeed the only sub-indicator that presented a relevant change in the risk score this year. This is explained by the fact that in MPM2024 16 countries are in the high-risk range— Albania, Austria, Croatia, Cyprus, Estonia, Finland, Hungary, Italy, Luxembourg, Poland, Romania, Serbia, Slovakia, Spain, the Czech Republic, and the Netherlands —whereas last year the high-risk range included two additional countries: Greece and Ireland. These had a decrease in their risk scores, moving to the low and medium-risk range respectively for the reasons explained in the previous paragraphs.

Finally, it is important to note that the transparency of media ownership will be substantially affected by the new provisions of Regulation (EU) 2024/1083 (European Media Freedom Act), which require media providers to make information easily and directly accessible; for instance, on their direct or indirect owners with shareholdings enabling them to exercise influence on the operation and strategic decision-making, including direct or indirect ownership by a state or by a public authority or entity, and information of their beneficial owners. This information will be stored in national media ownership databases to be created by Member States (Article 6). The EMFA provision is expected to counterbalance the restriction on public access to beneficial ownership information established by the decision of the CJEU on Joined Cases C-37/20 and C-601/20, based on their interference with rights to privacy and personal data protection. Indeed, as previously mentioned, in order to cope with the CJEU decision, the proposed 6th EU Anti-Money Laundering Directive, though providing for EU-wide public access to the data on beneficial owners, introduces the obligation to demonstrate a “legitimate interest” in this context. This means that in addition to supervisory and public authorities, and obligated entities, also persons of the public with a legitimate interest, including journalists and civil society, may access the registers.³¹

4.2 Plurality of media providers

This indicator assesses the threats to media pluralism that arise from the concentration of media ownership. For the sake of this indicator, we refer to media service providers³². The scope of the indicator includes the legacy media (audiovisual³³, radio, newspapers, including their non-linear services and their electronic versions) and online media (digital outlets of the legacy media and digital native media). Risks to market plurality can arise both from the concentration of ownership in a single news media sector, and/or from the concentration of ownership across different sectors. Horizontal and cross-media concentration are therefore both assessed in this indicator, which contains 15 variables:

31 Council of the EU (2024) Anti-money laundering: Council and Parliament strike deal on stricter rules. Press release, 18 January 2024, Available at <https://www.consilium.europa.eu/en/press/press-releases/2024/01/18/anti-money-laundering-council-and-parliament-strike-deal-on-stricter-rules/>. Accessed 29 April 2024.

32 See the definition in Art. 2 (1)(2) of the Regulation (EU) 2024/1083: “‘media service’ means a service as defined by Articles 56 and 57 TFEU, where the principal purpose of the service or a dissociable section thereof consists in providing programmes or press publications, under the editorial responsibility of a media service provider, to the general public, by any means, in order to inform, entertain or educate; ‘media service provider’ means a natural or legal person whose professional activity is to provide a media service and who has editorial responsibility for the choice of the content of the media service and determines the manner in which it is organised”.

33 As regards audiovisual media, the Monitor adopts the definition that is laid down in the Audiovisual Media Services Directive 2010/13/EU, as modified by Directive 2018/1808/EU. The variables under consideration cover both linear and non-linear audiovisual media services.

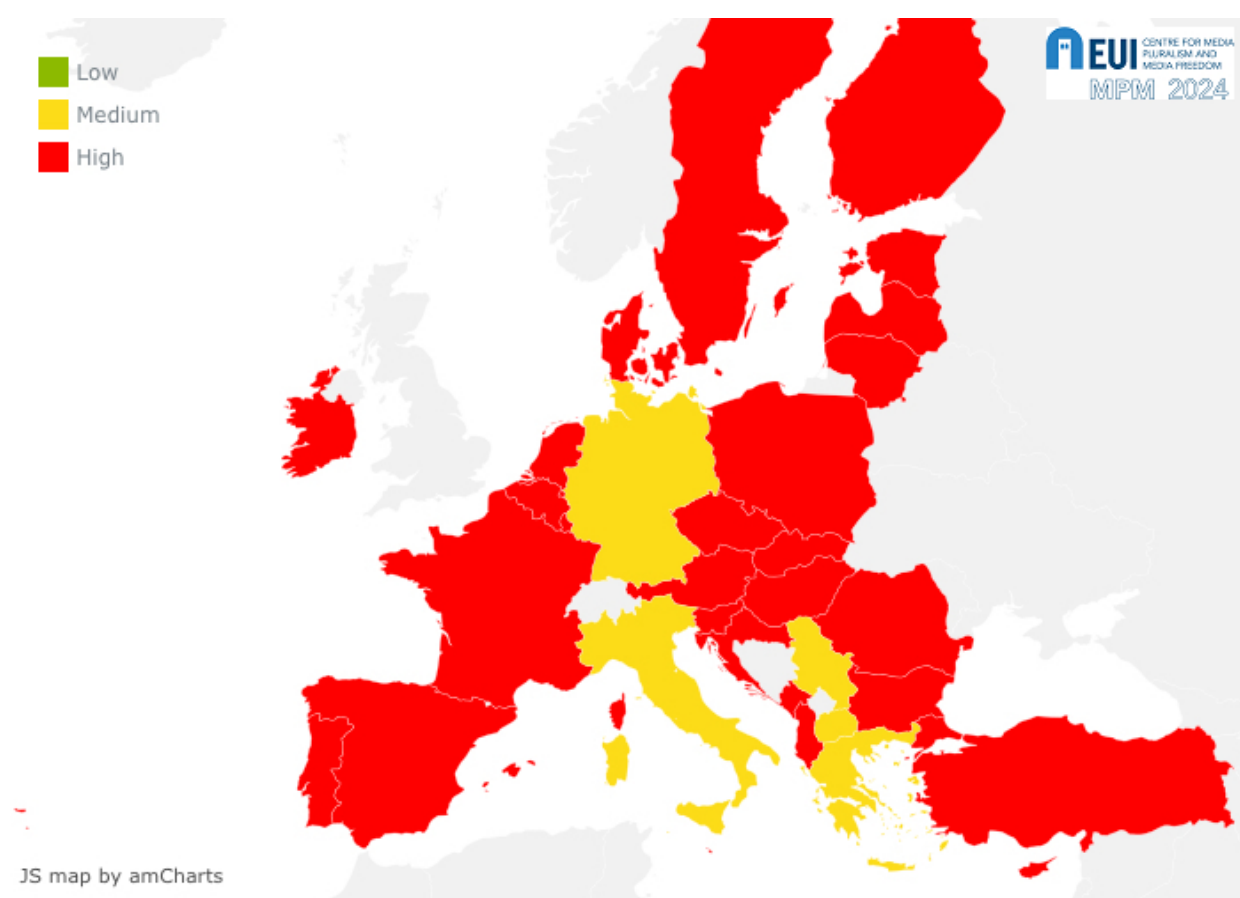
- *Seven legal variables to assess whether a country has media-specific rules to prevent a high concentration of ownership in each media sector (horizontal concentration) and across the different media sectors (cross-media concentration); whether these rules are effective; and whether their compliance is overseen by an independent authority.*
- *Eight economic variables to assess the situation on the ground, using the Top4 index for each media sector (horizontal concentration) and for the whole media market (cross-media concentration). In MPM2024, the thresholds of economic concentration based on which the risks are coded have been slightly revised (see Methodology - Annexe I). Therefore, the comparison with the previous results might be influenced by this methodological change.*

The indicator of **Plurality of media providers** scores at high risk, at 80% if the average of all the countries covered by the MPM is considered. It is higher, at 82%, if the EU countries alone are considered. This is the only indicator, in the **Market Plurality** area, in which the EU countries present a risk level that is slightly higher than that of the candidate countries. This can be explained by taking into account the tendency towards concentration that characterised the development of the media market and followed its technological development: in the candidate countries, the (relatively) lower concentration might depend on an earlier stage of technological and market development.

The tendency towards concentration, which emerged since the last century with the development of the audiovisual industry, did not decrease, but if anything increased, with digitalization, which further pushed the media providers to consolidate and/or merge, often as a defensive strategy (Noam, 2016; Schlosberg, 2017; Carlini et al., forthcoming). The potential impact of media ownership concentration on opinion power and media pluralism is addressed by the national regulatory frameworks in many EU countries (with different and fragmented provisions: see Ranaivoson et al, 2022), and now by the Regulation (EU) 2024/1083, which introduces a separate assessment of media market concentrations and harmonised procedures and criteria to evaluate their impact on media pluralism and editorial independence (Art. 22).

In the MPM2024, for the first time, the indicator on the concentration of media providers registered a small risk decrease, declining from 85% to 80%. This result should be understood considering the methodological changes introduced in the MPM2024, with a revision of the thresholds of risk in the economic measurement of concentration (see Annexe I), therefore it does not necessarily indicate a change in the situation on the ground. The fine-tuning of the methodology, even if not substantially reducing the warning for the high level of concentration of media ownership, allows us to take into consideration the technological evolution and get a more nuanced representation of the situation of the countries and the different sectors (Carlini, 2024).

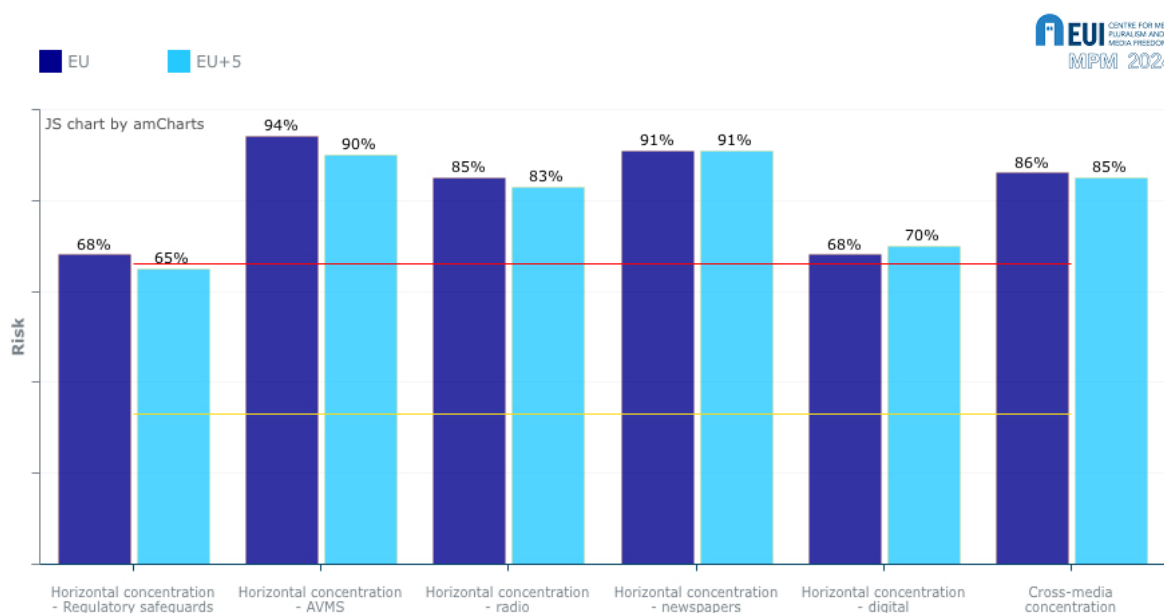
Figure 4.2.a. Plurality of media providers - map of risks per country



In the indicator **Plurality of media providers**, no country is at low risk, five countries are at medium-risk, and 27 countries are at high risk. The countries scoring a medium-risk are (in ascending order of risk): Germany, Italy, Greece, Serbia, and the Republic of North Macedonia; their scores are between 55% and 64%, which means at the upper level of the medium-risk range. The reasons for the medium-risk result in the EU countries are mainly related to the legal framework: if there are, in any given country, media-specific rules to prevent or address high concentration, and they are supervised by an independent authority, this reduces the risk level. When it comes to the economic variables, assessing the situation on the ground—i.e., the actual concentration per sector and cross-media, measured with the Top4 index—the situation is more homogeneous and the risk level is higher. For Germany and Italy, the decrease in the score for this indicator (which caused Italy to shift from the high-risk to the medium-risk zone) is because, in some media sectors, the share of the leading four groups is below the (new) threshold of high risk.

The scores of the countries at high risk in this indicator range from 69% to 96%. Six countries score 96%: Bulgaria, Estonia, Finland, Lithuania, Luxembourg, and Sweden. In those countries, both the legal framework and the economic scenario contribute to the extreme result; which should also be evaluated taking into account the small size of the markets.

Figure 4.2.b. Plurality of media providers - averages per sub-indicator



The results per sub-indicators once again confirm the dichotomy between the legal frameworks and the actual concentration, measured by sector (audiovisual, radio, newspapers, digital) and for the whole media market.³⁴ The sub-indicator on *Regulatory safeguards against horizontal concentration* is the one performing better, with a medium-risk score, of 65%. When it comes to the measurement of horizontal concentration, all the sectors show a high risk. The digital native media presents a situation that is slightly better in terms of concentration, but still in the high-risk range. In addition, it must be noted that the assessment in this field is particularly challenging due to the lack of reliable data. On one hand, the digital media sector in many cases is not monitored by the (media) authorities, whose scope is often limited to the audiovisual sector; on the other hand, the lack of standardised and reliable methods of audience measurement influences the data collection.³⁵

34 The digital extension of the traditional media is included in the AVMS, radio and newspaper sub-indicators. The sub-indicator on digital only includes the pure digital media services providers. Furthermore, it does not include the intermediaries, such as social media, search engines and aggregators, which are considered in the following indicator, on Plurality of digital markets.

35 The issue of the audience measurement in the digital sector is addressed by Art. 23 of Regulation (EU) 2024/1083

The topic of media concentration is widely analysed and discussed in the literature as well as in the policy and civil society debate; it is directly addressed by the new EU regulation, which will enter into force by 2025. Together with the numeric results in terms of risk scores, the MPM also allows a qualitative overview of the tendencies across the countries monitored in the exercise. The tendency towards consolidation continued, with several media mergers proposed or finalised; an evolution of the approach of the competent authorities in evaluating those mergers is also reported. Štetka et al. (2024) point out that in the Czech Republic, “the approach by the Office for the Protection of Competition towards assessing market dominance has been traditionally rather benevolent and non-interventionist. This was evidenced again in 2023 when the Office approved the acquisition of the company Borgis, the publisher of the daily Právo and content supplier for the second most popular news website Novinky.cz, by Seznam, a digital platform that runs the market-leading online news website Seznamzpravy.cz, among multiple other brands and services”. (ibid, p.12). In Estonia, a country characterised by a very high level of risk for this indicator, Palmer and Žuffová (2024) report that the competition authority blocked a planned merger of the country's two newspaper distribution companies. “These companies are the state-owned Eesti Post, which operates under the Omniva brand and Express Post (which is owned by the two big private publishers Delfi and Postimees). As a result, Express Post decided to stop its delivery operations and laid off 450 workers. The blocked merger was mentioned by the owners of the media publisher Delfi, as a reason (or justification) for stopping the print publication of the Monday edition of the daily *Eesti Päevaleht*.” (ibid, p. 20). The argument that the media industry needs higher concentration to survive is debated in the Finnish MPM report, highlighting that “a very recent study investigating media concentration's effects on diversity of media content in Finland claims that from a pluralism point of view, ownership concentration is both a threat and an opportunity (Lehtisaari et al., 2024). On one hand, media concentration creates a better chance of surviving in the digital transformation by increasing cost-efficiency, as the solutions are easy to duplicate within the group. As a result, many papers that have been transferred to a new owner have received more resources. They may now create such content and quality that the paper alone would not have been able to produce. Without the new owners, many small titles would have already been discontinued. On the other hand, negative consequences include a larger and more rigid organization, individual newsrooms' narrowing autonomy and the loss of the media's own voice. As a result of the shared content, the diversity and plurality of the news media is reduced, which threatens access to diverse information and freedom of expression”. (Ylikoski & Ala-Fossi, 2024, p.9).

The debate has been particularly vivid in recent times in France, with the acquisition of the Lagardère group by Vivendi, and other mergers at the national and regional level, with relevant consequences for the newsrooms. As the French MPM report highlights, “the progress of vertical, horizontal and diagonal/conglomerate concentration and their deleterious effects on pluralism and democracy in France keep on being major issues within the French media, political and academic fields. (...) In response to these evolutions and their effects on media independence and pluralism, there have been a variety of initiatives over the last couple of years to assess the situation and propose possible reforms or amendments to existing regulations: a Senatorial commission on media concentration in 2022 and, in 2023, the ‘General Estates of information’ initiated by President Macron, as well as a counter-initiative launched by independent media” (Ouakrat & Sklower, 2024, p.7 and 23). The French debate focuses on the need to revise concentration thresholds, and to reshape the system, considering the digital evolution and abandoning a “silos” approach (ibidem, p.56).

Cases of proposed mergers and related debates are reported in other countries. In Poland, “in 2023 the Appeal Court ultimately overturned the decision of a competition regulator UOKiK blocking a takeover of Eurozet company by Agora in 2021. As a result, Agora completed the takeover of the company in 2023”. (Klimkiewicz, 2024, pp. 15-16). In the Netherlands, “the ACM (the administrative authority overseeing compliance with ownership limitations in the news media sector) declined to allow the merger between RTL and Talpa, but yet another potentially impactful merger is on the horizon now, between RTL and DPG Media, the media group controlling a large part of the Dutch newspaper market” (De Swert et al., 2024, p.6). In Slovakia, “the regulatory safeguards against the high degree of horizontal and cross-media concentration of ownership in the media sector adopted in 2022 (...) apply to TV and radio broadcasters and do not cover press and news websites. This shortcoming became evident in 2023 when the owner of the second most-read daily, *Plus jeden deň*, purchased the most-read daily, *Nový čas*, without any constraints.” (Urbániková, 2024, p.16).

While the tendency towards concentration is common, and often it is at a trans-national level, the variety of criteria based on which they are approved or blocked by the national authorities confirms the extreme fragmentation in the EU internal market in this regard (Ranaivoson et al., 2022). Because this fragmentation can negatively affect the exercise of economic activities by media service providers in the internal market, this is one of the reasons for the intervention of the European Media Freedom Act, invoking Art. 114 of the Treaty on the Functioning of the European Union.

4.3 Plurality in digital markets

This indicator aims to assess the threats to media pluralism that arise from the concentration of ownership in a broader notion of the media market, focusing on the players of the media ecosystem that act as intermediaries to the news.³⁶ Following a reconceptualization of the notion of media market plurality in the online environment, this indicator includes in its scope the digital intermediaries, whose role in the media market is crucial, as they select the access to news, and attract market resources. Even if the digital intermediaries (social media, search engines, algorithmic aggregators) do not produce, or only produce to a very limited extent, news and original content, they operate in the same market as the news media providers, thus competing for the consumers' attention and advertising. In so doing, they have challenged and disrupted the media business model, as well as the regulatory framework, which is tailored to the pattern of the traditional media (Irion et al., 2022a; European Commission, Directorate-General for Competition, Montjoye et al. 2019; Furman et al., 2019; Martens et al., 2018; Moore & Tambini, 2018; Prat 2020; Prat & Valletti 2022; Wu 2017).

This indicator is composed of three sub-indicators:

- *Online platforms concentration*
- *Competition enforcement*
- *Financial obligations of the online platforms*

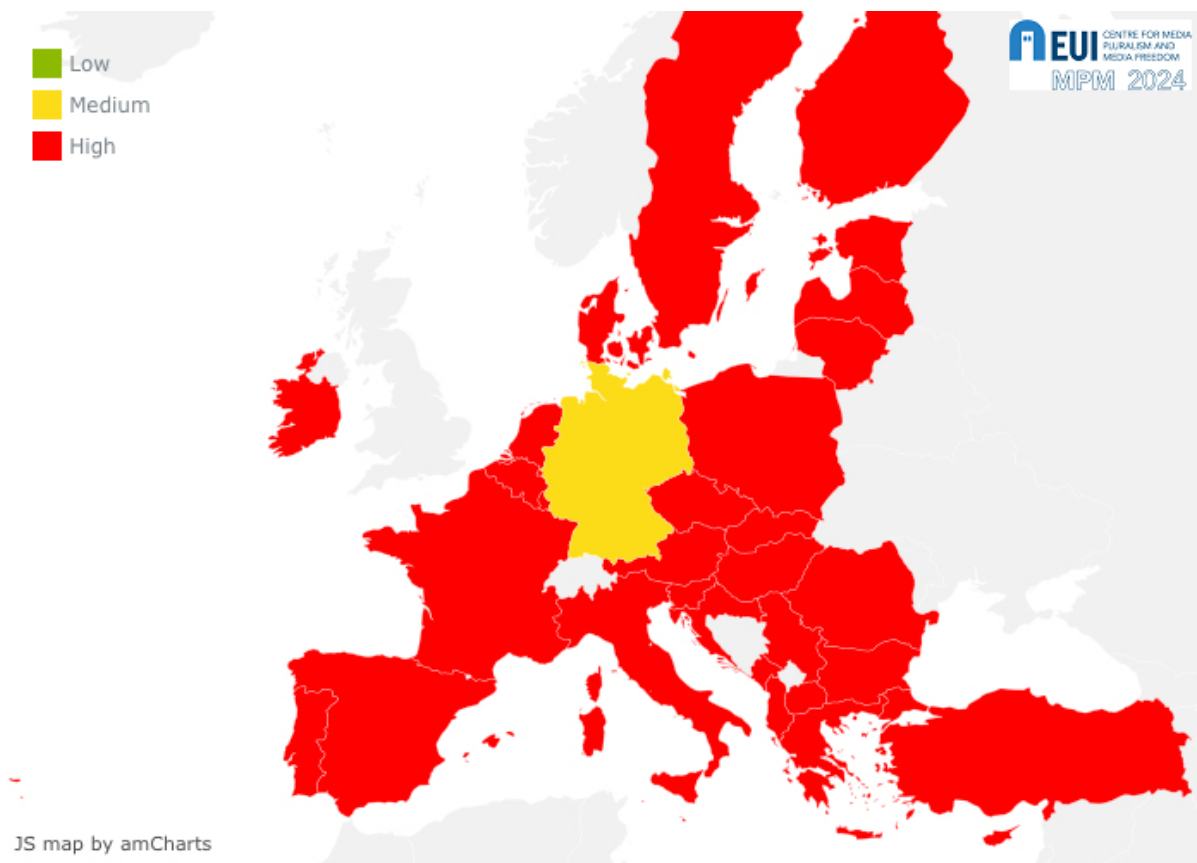
The sub-indicator on Online platforms' concentration measures the concentration of the digital intermediaries whose role is crucial in the distribution of, and access to, the news. The risk of concentration is assessed in the online advertising market and the online audience, which is measured through the use of the Top4 index. The sub-indicator is composed of two economic variables. The variables in the other two sub-indicators are all legal. The sub-indicator on Competition enforcement deals with the challenges digitalisation poses to traditional competition rules and tools. To assess the risk, the country teams are asked to consider the evolution of the competition and regulation policies, bodies and tools to address the challenges brought by digitalisation. Finally, a third sub-indicator deals with the financial obligations of the platforms, those that are derived from their economic relationships with the media (and also following the process of the transposition of the EU Directive on Copyright and Related Rights) and from the taxation of digital services/companies.³⁷

³⁶ As affirmed in the foundation study of the MPM, "Not only the supply aspects, but also the distribution mechanisms and potential access to the media, represent areas to be assessed in order to develop economic indicators of media pluralism" (Valcke et al., 2009, p.73). See also Irion et al., 2022b (Table I.1 p.17: Definitions of media actors and other actors in the media ecosystem)

³⁷ At the end of 2023, the deadline expired for the EU Member States to transpose the EU directive 2022/2523. Even though this is not a tax on digital services, its implementation also impacts the large digital platforms, and therefore it has been considered in the data collection for MPM2024.

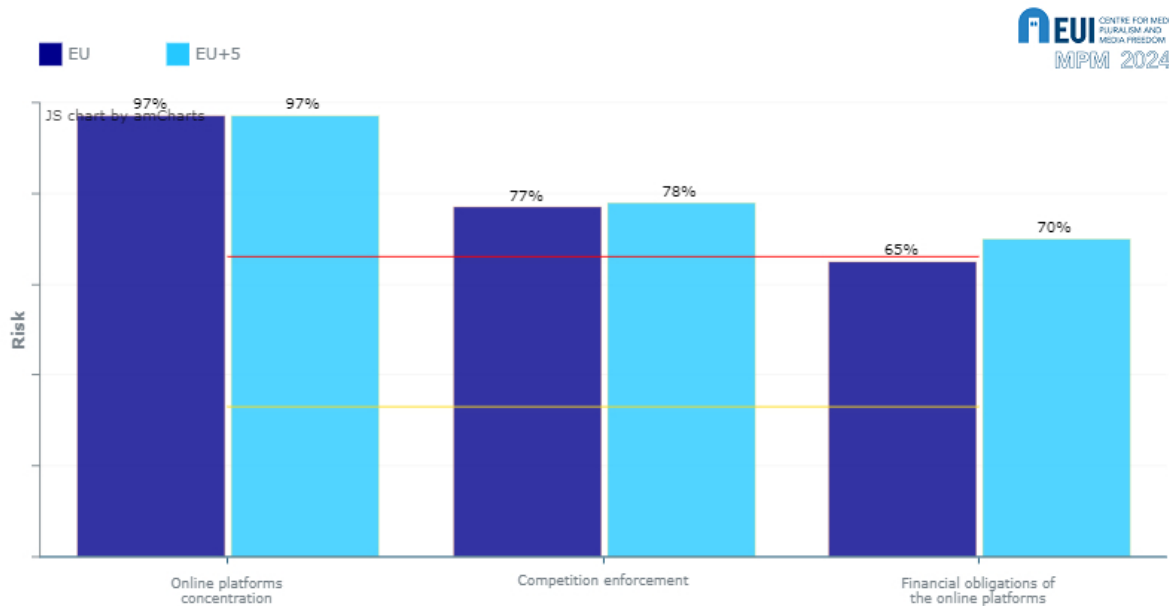
The indicator of **Plurality in digital markets** is at high risk at 82%. This is the highest level of risk across the 20 indicators in the MPM, confirming and measuring the digital threats to media pluralism in the economic dimension. There is no substantial difference between EU countries and candidate countries in the average score of this indicator.

Figure 4.3.a. Plurality in digital markets - map of risks per country



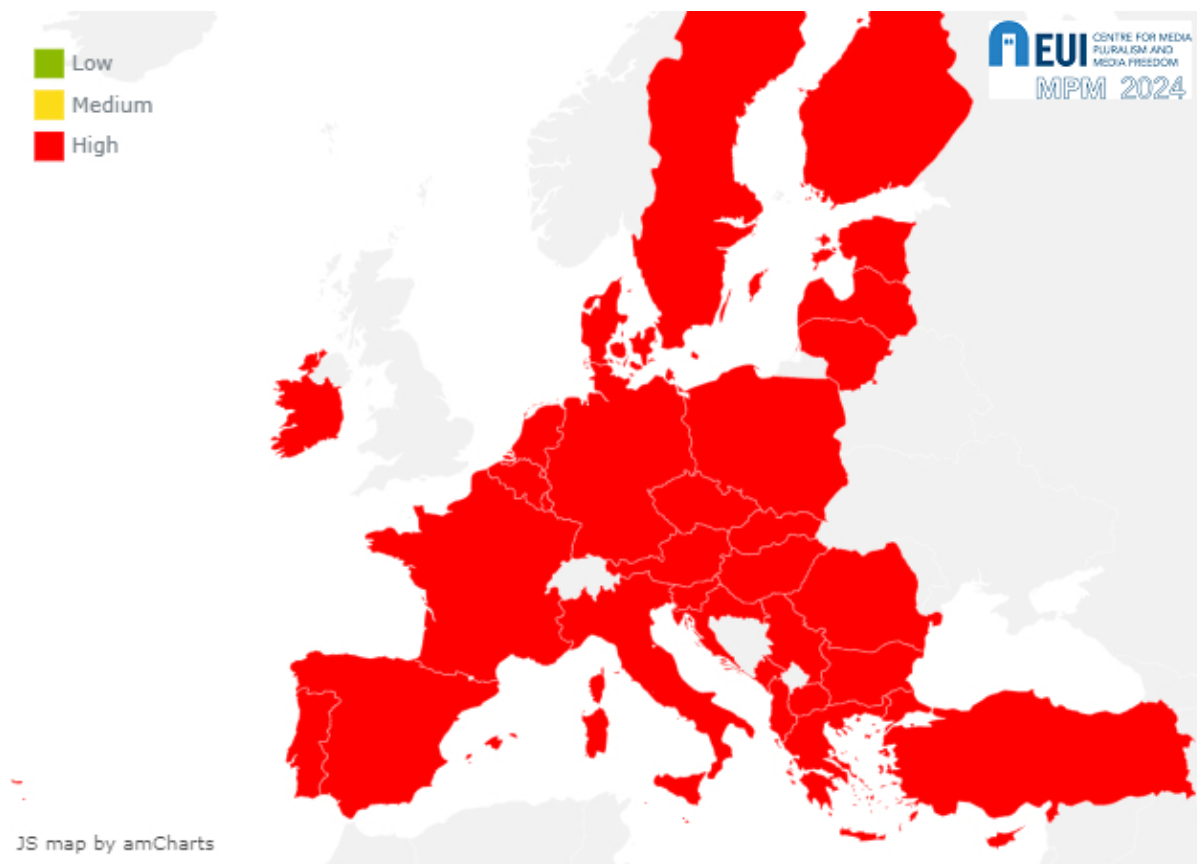
As shown in the map, no country scores as being at low risk, and there is just one country, Germany, at medium-risk with a score of 61%. This result is mainly because the German competition framework is dealing with digital dominance and has introduced amendments to the Competition Act since 2021. “The 2021 amendment to the ARC [Act against Restraints of Competition] enables the Federal Cartel Office to intervene early and effectively against abusive market behaviour by large digital groups. Meta and Google were classified by the Federal Cartel Office as companies with market power and are now subject to special abuse supervision for five years” (Kalbhenn, 2024, p.18). Even so, the mitigation in the risk level is limited to the legal variables, whereas the economic ones, measuring the actual concentration, are at high risk in Germany as well.

Figure 4.3.b. Plurality in digital markets - averages per sub-indicator



All the sub-indicators are at high risk, for the average of the EU + candidate countries. In comparison with last year, no noticeable evolution is registered for the sub-indicator assessing the actual concentration in the markets, which is once again at the maximum level of risk recognized by the MPM methodology (97%), showing that the degree of concentration in the distribution (and access to) the news in the digital environment is even higher than the concentration of media providers. The map of the sub-indicator on *Online platform concentration* is entirely red (high risk).

Figure 4.3.c. Plurality in digital markets - sub-indicator on online platforms concentration - map of risks per country



As highlighted in the previous MPM reports, the data collection for these variables is challenging: for the economic data, because the companies that dominate the digital markets; and for the data on audiences online, because of the lack of standardised measurement methods are not EU-based, and of the opacity of the data in this field. The data collected in the MPM by the national researchers either came from the estimates of national regulators, competition authorities (for example, in the cases in which competition cases or inquiries on the digital advertising markets have been opened) or commercial databases. The lack of data in this case is coded as a risk according to the MPM methodology.

The sub-indicator on *Competition enforcement* scores in line with last year, with an average risk level at 78%. For this sub-indicator, one country is at low risk (Germany, see above), nine are at medium-risk, and the remaining 22 countries are at high risk. In a year characterised by the entry into force of the Digital Markets Act (Regulation (EU) 2022/1925), but still waiting for the application of the consequent obligations to the gatekeepers, the assessment at the national level did not show remarkable changes nor evolution. As in previous years, some competition cases that are relevant to the scope of

this indicator have been opened. In Italy, “the Antitrust Authority opened an investigation to ascertain the alleged abuse of economic dependence by Meta. For a period, in fact, it was not possible to add most of the music content on the Meta platforms due to difficulties in negotiations for the renewal of the licence for the use on digital platforms of musical works covered by the rights of authors represented by the Società Italiana degli Autori ed Editori (SIAE). Meta and SIAE reached an agreement in October 2023” (Vigevani et al, 2024, p.22). In France, the Competition Authority pronounced “protective measures” against Meta for its rejection in its ad-verification apparatus of a small French company, Adloox (Ouakrat & Sklower, 2024). In June 2023, the European Commission closed the investigation into the online display advertising market, accusing Google of breaching EU antitrust rules.³⁸

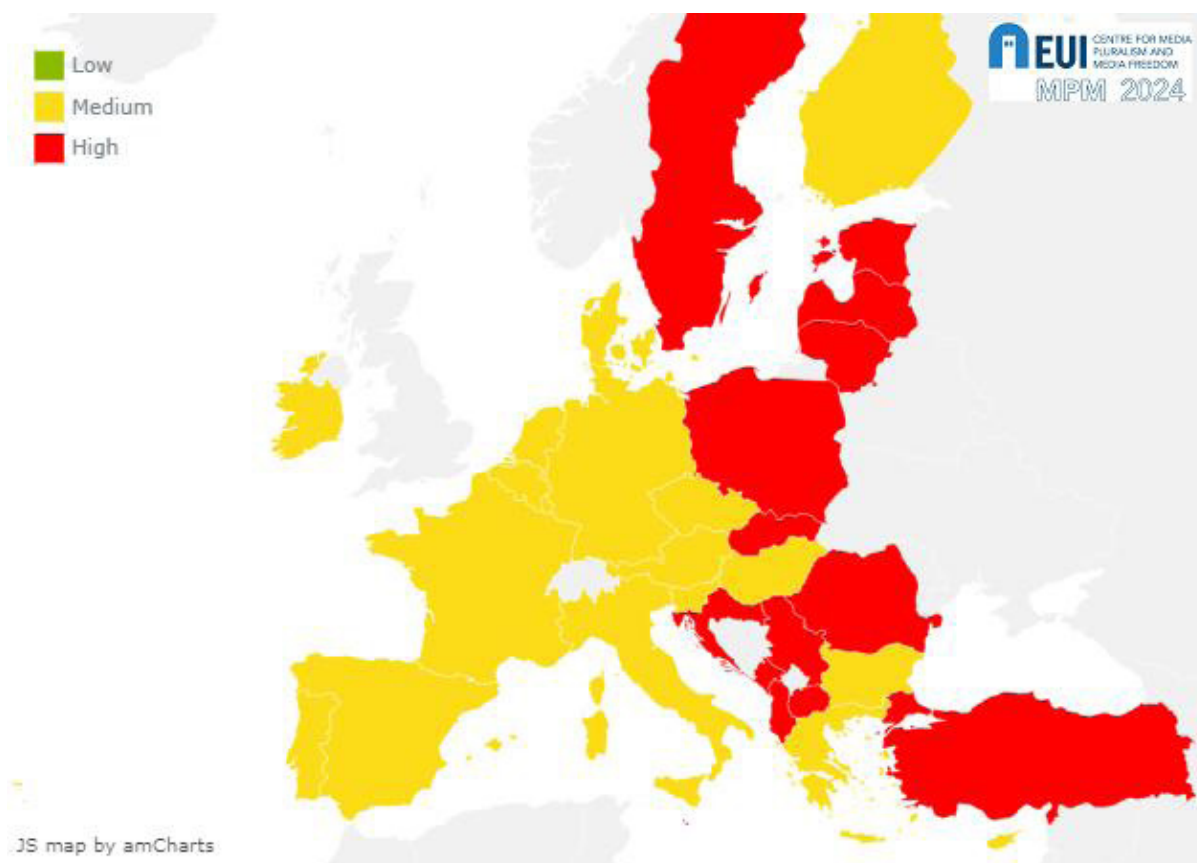
A slight decrease in the risk level is assessed in the sub-indicator on the *Financial obligations of the platforms*, particularly in the EU countries. This result is to be understood taking into account the transposition, in almost all the Member States, of the Council directive EU (2022/2523) on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union. Since 2020, and following the debate on fair taxation of digital services, a variable in the MPM questionnaire aims to assess the existence and effectiveness of such a tax. The evolution of the international reform process and the OECD’s agreement of a minimum level of taxation for the largest corporations led to the Council Directive EU (2022/2523), with a deadline for national transposition on 31 December 2023. Even though the “minimum tax”, constituting pillar 2 of the OECD’s reform of international taxation is not a tax on digital services, its effective implementation impacts the large digital corporations (Thomadakis, 2023).

In the same sub-indicator, a variable assesses the state of the economic relationships between the online platforms and the publishers, asking not only if the EU Directive on copyright and related rights (Directive (EU) 2019/790) has been transposed, but also the actual state of negotiations and/or agreements. As documented by the literature, competition cases and policy initiatives, the economic relationships between platforms and media content providers are complex and raise several issues (OECD, 2021). Since MPM2022, the results for this variable allow us to track the development of these relationships in the EU and candidate countries. In terms of the risk level, there are no improvements, with an average high risk for this variable and no country scoring a low risk. In the countries at high risk, there are no negotiations between platforms and publishers, whereas in the medium-risk countries, there are financial negotiations and/or agreements, but these are not effective or are limited to a few prominent media. The lack of transparency on the terms of the agreement is also evaluated as a risk.

³⁸ Press release, 14th June 2023. Antitrust: Commission sends Statement of Objections to Google over abusive practices in online advertising technology https://ec.europa.eu.eu.eu.idm.oclc.org/commission/presscorner/detail/en/ip_23_3207

Figure 4.3.d. Plurality in digital markets - variable 90.

Are there financial agreements in your country, between digital intermediaries and media providers, to remunerate the media providers for the use of copyright-protected content, or more generally to contribute to their financing?



The narrative reports highlight almost everywhere the challenges of the negotiating process, in terms of accessibility, transparency, and effectiveness. A common trend is the use of publishers' associations to collectively bargain, in this way addressing a widespread warning on the risk that the negotiations of copyright could only benefit the biggest media companies. In the Czech Republic, the transposition of the EU Directive 2019/790 led to a clash with platforms; "both Google and Facebook have stopped showing snippets from news articles, and only showing titles and links. Already before the law came into effect, Google has also terminated the programme Google News Showcase which has been running for only a year (...). Following the termination of this programme, and in reaction to the defensive position of Google and Facebook vis-à-vis the Act on Copyright, 17 Czech media companies have launched a collective association in January 2024 to represent them in the negotiations with the platforms regarding their financial obligations". (Štětka et al., 2024, p.14).

In Denmark, “in October 2023, the Ministry of Culture approved the Danish Press Publications Collective Management Organisation (DPCMO) as a collective management organisation authorised to conclude agreements regarding press publishers rights on behalf of the publishers”. (Simonsen, 2024, p.17). In Greece, “the formation of XENOFON, a collective management organisation, marks an attempt to secure fair financial agreements between media providers and digital platforms, yet its effectiveness and the overall transparency of such agreements remain uncertain”. (Papadopoulou & Angelou, 2024, p.16)

In Hungary, the copyright management association, Repropress, was given the right to lead collective bargaining with online platforms for its members. Nonetheless, “the process of setting up a framework of compensations for news media was hampered by a change in Act XCIII of 2016 on the joint management of copyright and copyright-related rights (which obliged joint management organisations to prepare a detailed impact assessment and a detailed justification for its list prices), as well as information asymmetry, as only platforms know what share of their revenue comes from a given country, but they don’t share that information”. (Bleyer-Simon et al., 2024a, p.24)

In France multi-year agreements have been signed, after the competition authority stepped into the process, considering the lack of respect of the commitment to negotiate in good faith as an abuse of the dominant position by the platforms. As the French MPM report asserts, “France has indeed implemented a mechanism for platforms to pay for the use of such content, and another one to contribute to the financing of innovative media. This latter mechanism has been criticised (especially by independent, digital native media) as the sums have essentially been going to those media that already massively profit from State subsidies, and as the apparatus increases dependency upon the GAFAM”. (Ouakrat & Sklower, 2024, p.30).

Recent developments on the matter are the agreements between individual big publishers and companies developing generative AI, in France (Le Monde), Spain (Prisa Media) and Germany, where “Axel Springer and OpenAI announced a remarkable deal. They are entering into a global partnership. Through the partnership, ChatGPT users worldwide will receive summaries of selected news content from Axel Springer’s media brands, including Politico, Business Insider, Bild and Welt, including otherwise paid content. ChatGPT’s responses to user requests will include references and links to the full articles to ensure transparency and provide users with more information. The collaboration also includes the use of high-quality content from Axel Springer’s media brands to drive the training of OpenAI’s advanced Large Language Models”. (Kalbhenn, 2024, p.18)

4.4 Media viability

This indicator assesses the sustainability of news media production, as a prerequisite for media pluralism and diversity.³⁹ The indicator measures the risks related to the lack of sufficient economic resources to finance the media, assessing the market revenue trends, the economic conditions of journalists (employment and salaries), and the eventual role of public support. News media revenues are examined separately for each sector (audiovisual, radio, newspaper, local media, digital native). In all cases, the market revenue trends are evaluated in relation to the overall economic trends (a high risk is recorded if the media sector performed worse than the overall economy; a medium-risk if its variation is in the same range as the real GDP's variation; a low risk if the news media revenues performed better than the overall economy, taking into consideration inflation trends).

Two variables assess the resilience of the sector; one asks about non-advertising-based business models, while the second variable looks at journalistic innovation. The economic conditions of journalists are assessed in relation to the employment trends, and this is carried out separately for newsroom staff and freelancers. As economic sustainability can also be supported by public intervention, the last sub-indicator focuses on the impact of public financing and fiscal incentives, taking into consideration ordinary and extraordinary measures, and their effectiveness.

As a result, the structure of the indicator is now as follows:

- *Revenue trends*
- *Employment trends*
- *Public incentives to media pluralism.*

The average score of the indicator on **Media viability** is medium-risk at 62%, which is three percentage points above last year's score (and six percentage points above the score of the MPM2022). The increase is partly due to the waning of the positive effects of the post-COVID rebound. While the impact of high inflation in most EU Member States and candidate states, as well as Russia's invasion of Ukraine, were already felt in 2022, they were not yet fully reflected in the economic data available. Both factors led to higher risk assessments than in the year before.

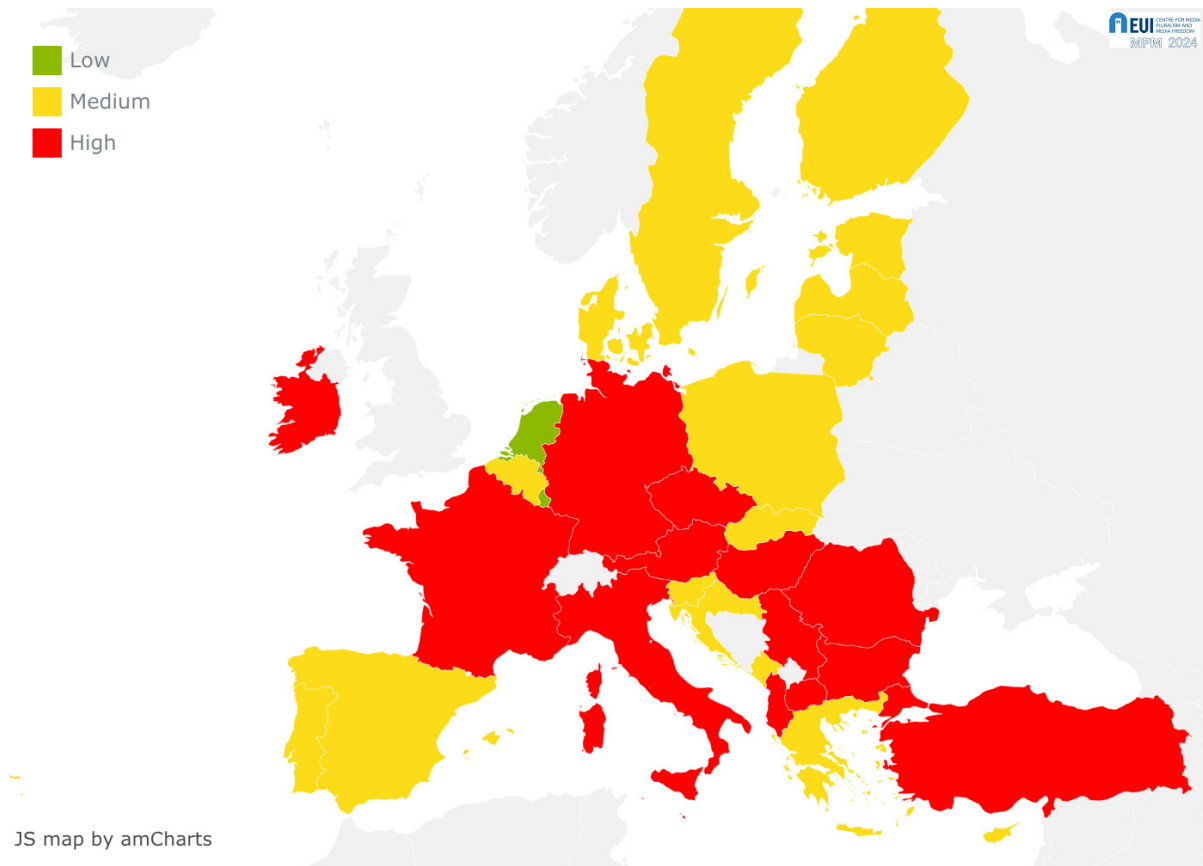
³⁹ "Sustainability and resilience of media revenue models can have a direct bearing on media plurality and diversity in a given media market. Internal plurality is at stake when media outlets whose financial viability is declining respond by cutting the costs of media production, for example, reducing newsroom staff. External media plurality suffers if, as a result, media outlets distribute essentially the same media content, for example, the news acquired from wholesale news providers, and if media outlets have to quit their business. Media outlets in financial distress are also less likely to perform their important democratic watchdog function to hold those in power accountable. An economically viable position, by contrast, makes news media more resilient against political pressure and media capture" (Irion et al., 2022a, p.249).

At the same time, there has also been a methodological change in the indicator: in the two years following the COVID-19 shock on media markets, the relatively small number of major layoffs and the difficulty in assessing salary cuts in light of high inflation have contributed to a more optimistic picture on employment (and salary) trends, but this was not necessarily substantiated by the constantly decreasing number of journalists and the precarity of freelancers. Thus, we combined the questions on layoffs, salaries and employment numbers and assessed them together this year. When looking at only EU members, the score of the variable was two percentage points lower than the average of all countries: it still scored medium-risk at 60%.

The indicator on **Employment trends** has risen to high risk (70%), while **Revenue trends** (63%) and **Public incentives to media pluralism** (56%) score medium-risk. In the case of **Public incentives to media pluralism**, a two percentage point decrease in the score was observed, while in the case of the other two, an increase in risk was observed.

Before analysing the results in detail, it should be pointed out that the data collection for the revenue and employment trends faces difficulties. Media authorities (or other national institutional sources) did not provide data in all of the countries, or, even where they did so, the data for the last calendar year were not always available at the time of the MPM exercise. Financial reports from the media companies are also missing in several cases. According to the MPM's methodology, other primary sources (including interviews with representatives of the media and journalists' councils) might be used, as well as forecasts from commercial companies, particularly in the advertising sector. This year, for the first time, we also included assessments of long-term trends (market developments from the pre-COVID-19 year 2019 until 2023) to make up for some of the missing data and to get a fuller picture of the developments. Still, when it comes to the market trends of the year 2023, the results for **Media viability** may be influenced by the lack of certain data and should thus be interpreted as only being provisional.

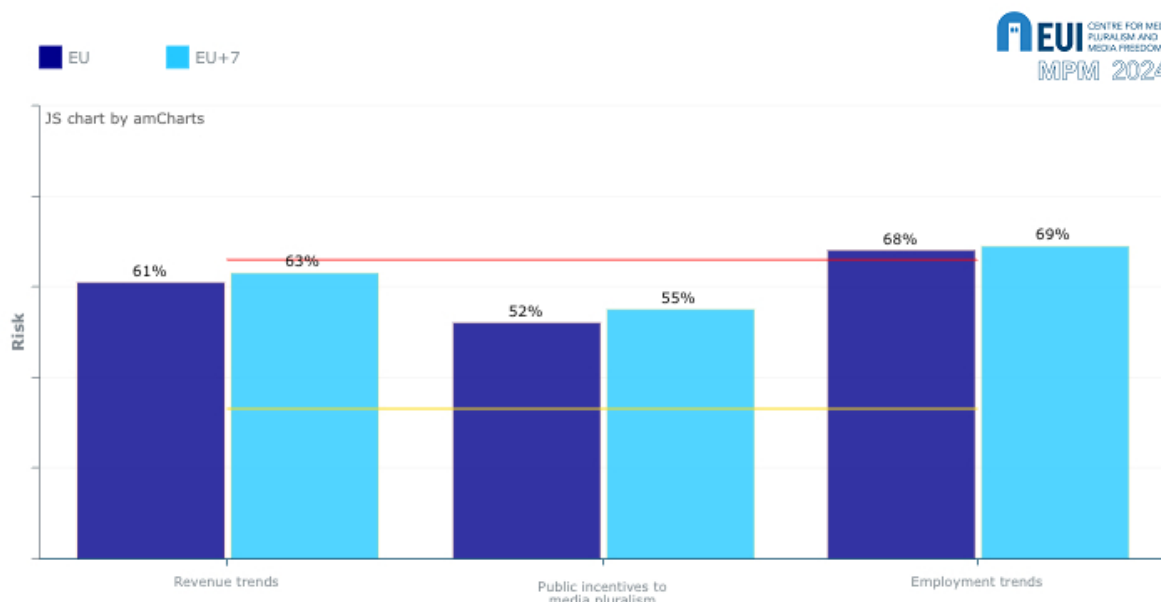
Figure 4.4.a. Media viability - map of risks per country



As can be seen on the map, only two countries score low risk on this indicator (Luxembourg and the Netherlands) and even those are very close to the threshold of medium-risk. Sixteen countries score medium-risk (Belgium, Croatia, Cyprus, Denmark, Estonia, Finland, Greece, Latvia, Lithuania, Montenegro, Poland, Portugal, Slovakia, Slovenia, Spain, and Sweden) and 14 countries have a high-risk score (Albania, Austria, Bulgaria, France, Germany, Hungary, Ireland, Italy, Malta, Romania, Serbia, the Czech Republic, the Republic of North Macedonia and Turkey). In Luxembourg, the good score is in part an outcome of widely available subsidies that contribute to the sustainable operation of private news media and keep the number of journalists constant (Kies & Lukasik, 2024), while the Dutch team highlighted that the largest media companies are still profitable, even if their profit rates decreased in the past year (De Swert et al., 2024).

The different factors that have impacted upon **Media viability** across the countries assessed in 2023 can be better explained, on an average level, by looking at the scores of the sub-indicators.

Figure 4.4.b. Media viability - averages per sub-indicator

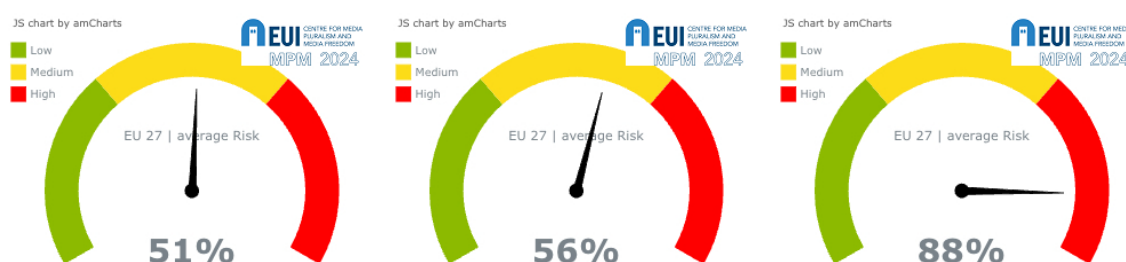


In the third decade of the 21st century, the effects of the weakening of the two-sided business model, based on advertisers and paying audiences, can still be felt in European media. The Czech country team mentioned in its report that “[a]ccording to a recent survey among Czech journalists, 90% of them consider the bad financial state of the media to be the single most important problem of Czech journalism; 83% of the respondents have complained about low salaries, and one fourth is thinking about leaving the profession as a whole” (Urbániková et al., 2024, referenced in Štětka et al., 2024). The Czech Republic is by far not the only country where economic concerns cause problems for journalists; when looking at the sub-indicators making up this indicator, *Employment trends* score high risk (68% for the EU and 70% for all countries), while we observed a medium-risk for **Revenue trends** (61% for the EU and 63% for all) and **Public incentives to media pluralism** (52% for the EU, 56% for all). Turkey has probably been the country where journalists experienced the greatest economic hardship, as the country’s journalists had to cope with extreme inflation and the disastrous consequences of a natural hazard, “the earthquakes in February 2023 in the southeast of Türkiye damaged the buildings of local media outlets, which left the journalists of the region with another economic burden to replace the equipment, offices, and resources to do journalism” (Inceoglu et al., 2024).

Revenue trends. Media revenues include market revenues (advertising, sales, subscriptions), public subsidies, and other sources of revenue (philanthropy, crowdfunding, events, and other supplementary services that are offered by the media service providers). In this latest edition of the MPM, the methodology of revenue-related variables was changed to allow for an assessment of a 5-year trend; in many countries (reliable) data on the latest financial year are not yet available for the latest year. As such, the comparability of this indicator with previous years is limited. Still, it can be observed that an EU-wide decrease in the inflation rate started to have a positive impact on certain sectors, especially in the audiovisual field (even if, in many cases, the latest available official data is from the high-inflation 2022 year).

In the Media Pluralism Monitor, we assess revenue trends separately for various sectors. This year, the newspaper sector shows a high risk, while the radio and audiovisual sector scores as being at medium-risk. In the case of newspapers, a significant increase in risk was recorded from 79% (already high risk) to 88%, which means that there are barely any countries in the sample where newspaper publishing would be considered viable (in the case of Belgium, the Netherlands and Spain, the revenues were seen as stable, while in Sweden, some degree of increase was recorded). For audiovisual media, a sizable decrease in risk was recorded, from 77% to 51%, which shows that television still plays an important role in media markets and is still capable of growing when the economic conditions allow. The digital media market has been growing in almost every country, but there were only a handful of cases where disaggregated data were available on news media or digital natives.

Figure 4.4.c Media viability - revenue trends by sector Audiovisual/ Radio/ Newspapers



In the recent data collection, the audiovisual sector proves to be the least risky media sector, followed by radio, both in the medium-risk band. These are sectors with high barriers to entry and high concentration of ownership, as the audiences and the advertisers still show interest in these two forms of media, the dominant players can still operate sustainably. Large Flemish companies, for example, are active not just across Belgium, but also in France, Ireland, and the Netherlands (Valcke & Wauters, 2024).

As the unusually high-risk score of 88% shows, newspapers are truly struggling across the EU. In the case of Austria, the team highlights that the weakness of the print newspaper market has the greatest influence on journalistic (un)employment, as this is the sector that employs the most journalists (Seethaler & Beaufort, 2024). At the same time, newspaper publishers with a strong online offer can turn out successful in the current media market. In the concentrated market of Estonia, the country team reported that the losses of print media are offset by the digital offers of the same companies, as willingness to pay for news online is growing (Palmer & Žuffova, 2024).

The example of digital media shows best how complicated it can be to gain access to revenue and advertising data across the countries covered. In most cases, digital media revenues include advertising spending on online platforms such as Facebook and Google, using them as a proxy for online news media would be problematic, as they do not show whether the income of news-producing outlets increased or decreased.

Local media have been a special focus of the research team this year, as the CMPF published a report on the state of local media and the possible formation of news deserts, referring to geographic areas where no or very limited local coverage is available (Verza et al., 2024). The risk score of the local media is the same as that of the newspaper sector: 88%. In this year's assessment, there were no cases of low risk. Only five countries reported that local media can be considered somewhat sustainable with relatively steady revenues (Austria, Cyprus, Germany, the Netherlands and Sweden), for the rest of the countries the deterioration was evident (or in very few cases, there was no data to provide an assessment). In the case of Austria, the team reported that local broadcasting was popular among audiences, and local newspapers, while suffering from economic challenges, were still in a less precarious situation than the national outlets (Seethaler & Beaufort, 2024). In Germany, 63% of local media publishers said that their content offers declined over the years, and 80% expected the declining trend to continue (Kalbhenn, 2024). In Denmark, Jysk Fynske Medier announced the closure of 11 out of 53 weekly newspapers in 2024, at the same time, local broadcast coverage is relatively strong, thanks to government subsidies, as the *Danish Broadcasting Corporation* and TV2, "significantly support local news media in Denmark, enhancing their sustainability compared to market competition" (Simonsen, 2024).

In certain countries, experts reported that local media were further weakened through “unfair competition” from municipal publications, referring to outlets that are published by local authorities, and often reporting on public affairs in a biased manner (Klimkiewicz, 2024).

At the same time, many countries mentioned that new initiatives were started on the local level. In Poland, the National Local Media Cluster “Lokalsi” was established in October 2023: “[t]he initiative gathers several dozen small publishers producing around 70 local outlets reaching around 8.5 million unique users. The network’s main aim is to represent local outlets in financial negotiations with platforms and collectively address economic and technological barriers” (Klimkiewicz, 2024). In Hungary, independent local media joined forces as part of the *Szabad Hírek* (Free News) project, in France, “digital native regional media [were launched], with titles such as *Mediacités* (a network of 4 local websites—Lille, Lyon, Nantes and Toulouse—animated by a Parisian newsroom), *Le D’Oc*, *Le Poulpe*, *MarsActu*” (Ouakrat & Sklower, 2024).

Two questions in this sub-indicator assess to what extent news media are adapting to the current economic environment, changing audience preferences and new technologies. The variable assessing the development of new, non-traditional revenue streams scores medium-risk at 45%, and the variable looking at innovations in products, formats and the organisation of workflows is slightly higher at 48%.

Non-traditional revenue streams mentioned are subscriptions and donations, but the organisation of events, the selling of merchandise and the development of new digital distribution strategies were also mentioned; but in many countries, these new approaches were limited to small start-ups. Examples are *Kontrast*, *Zetland*, and *Frihedsbrevet* in Denmark, which “developed alternative funding sources, such as membership- and community strategies, demonstrating real innovation and initiative. These outlets aim to create a sense of community through membership events and directly target identity groups such as conservatives, sceptics, intellectuals, etc.” (Simonsen, 2024). Bilić & Petričušić (2024) mention that, according to recent data, Croatian outlets have more than 30,000 digital subscribers. At the same time, it must be mentioned that subscriptions that are combined with hard paywalls can have a detrimental effect on the availability of news, especially in countries where the public discourse is impacted by political interference or media capture (see Bleyer-Simon et al., 2024b). Philanthropic funding and foreign grants are also used by many media outlets; the risk of these revenue sources is exemplified in the case of Hungary, where the governing party’s allies launched smear campaigns against the recipients of foreign support, while a new law considers these income streams possible sources of foreign interference (Bleyer-Simon et al., 2024a).

An example of large players innovating in revenue generation is the “total TV – ecosystem”, launched by Ads & Data in Belgium. “It is the result of two connected ecosystems (that of set-top boxes and that of the online world). Ads & Data is the first player on the market, which, thanks to its shareholders Proximus and Telenet, integrates and links telco data with online data and data from the advertiser. This can be deployed across different environments for targeted advertising” (Valcke & Wauters, 2024). In France, one of the strategies chosen by large outlets is the Europeanisation of the media or an opening towards global French-speaking audiences. The authors of the French report caution that solving the problems of precarious finances may not necessarily lead to better quality or more diverse content: “Solid online models and the development of new forms of financing, especially for online media, point to solutions that can go either towards more independence or to additional streamlining of media outlets, with obvious negative consequences on pluralism” (Ouakrat & Sklower, 2024).

Similarly to the innovation in business models, the content- and production-based innovations are limited in many cases to a subset of media outlets, often digital natives. Podcasts, video production and a greater emphasis on investigative journalism are the most common examples across the countries assessed. Solutions journalism and data journalism were also mentioned, as well as the use of artificial intelligence (AI). “The AI experiments include, for example, using AI in going through big data sets, doing transcriptions and summaries, reading [out articles], making 3D graphics” (Ylikoski & Ala-Fossi, 2024). However, Bleyer-Simon et al. (2024a) mentioned in the case of Hungary that innovating and experimenting can be costly, among other things, due to the high human resource needs of such activities; while Likmeta & Voko (2024) pointed out, in the example of Albania, that attempts to innovate “have been moderate in providing new revenue streams, increasing the audience and efficiency in the newsroom.”

In some cases, media outlets hope to improve their viability by building synergies. In France, it has become commonplace for established media to cooperate with “influencers”, for example, “*Le Mouv*’ offers slots to content creators; YouTuber Hugo Decrypte is now an interviewer for *France 2*” (Ouakrat & Sklower, 2024). In Germany, the streamlining takes place across different sectors “whether through more intensive cooperation within *ARD*, by interlinking the media libraries in the *ARD/ZDF* streaming network or by bundling audiovisual and text offerings from *RTL* and Gruner & Jahr in the *RTL+* app” (Kalbhenn, 2024).

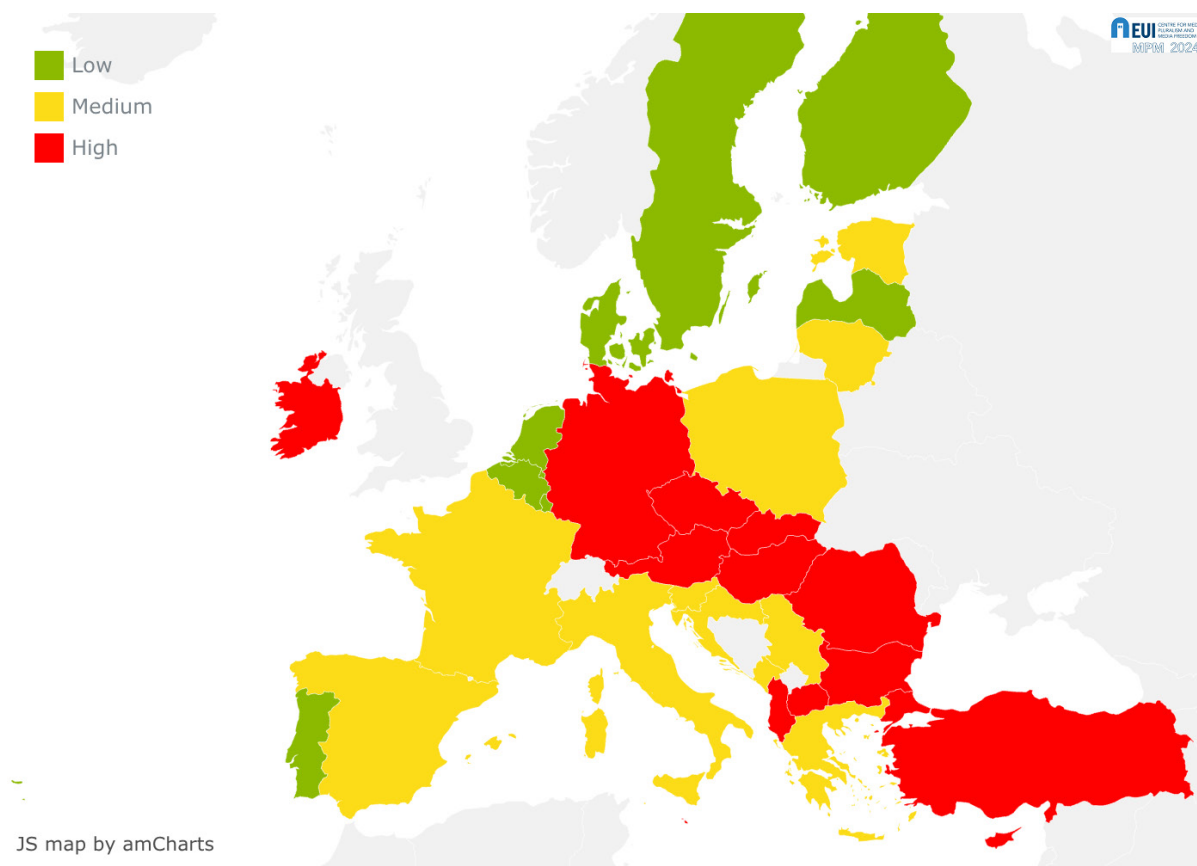
Employment trends. Decreasing job security and the decline of the workforce have been a problem in many countries for the past decades. This is also visible in the high-risk score of this indicator: on average, 68% for the EU and 70% for all countries. Out of those where data was available, only two countries (Luxembourg and Slovakia) registered an increase in the number of employed journalists. However, it can be seen that

the pace of the decline is getting slower. In Hungary, representatives of some independent outlets told the country team that the size of their newsroom has been steady over the past years, and some of them even experienced slight growth; but these outlets were all small- or medium-sized media, based in the capital, and thus not representative of the whole market (Bleyer-Simon, et al. 2024a). In Denmark, the country's tradition of labour unionisation is seen as a possible safeguard for journalists working in a relatively weak industry, as “the Danish Union of Journalists provides significant job protection for journalists”, even though their impact is somewhat limited by the fact that “editors negotiate contracts individually with media owners” (Simonsen, 2024).

Freelancers are in an especially vulnerable situation, with only the Netherlands reporting an improvement in their working conditions, as “[in] 2023, the Collective Labour Agreement for journalists increased the salaries for journalists, and this included most of the freelance journalists (working for the major newspapers) whose income should increase by about 9,5%” (De Swert et al., 2023). In Finland, the Freelancers' Labour Market Survey 2023 found that the billing and taxable income of the country's freelancers increased after the COVID-19 pandemic, “being the highest in research's history” (Ylikoski & Ala-Fossi, 2024), still, the researchers didn't see sufficient ground to score the variable as low risk, as the income levels of freelancers remain significantly lower to those of employed journalists. In many cases, freelance journalists have not only lower salaries but also less social protection. Due to the poor working conditions, many freelancers complement their revenues from journalism with activities in other sectors, even in PR or other kinds of communications work, which might pose a conflict of interest.

In certain countries, the category of freelancers is misused by media owners and managers to minimise costs and responsibilities towards their workers. Suau-Martinez et al. (2024) refer to “false self-employed” journalists, in the case of Spain. These are “considered freelance but in reality work in the media as if they were contracted workers.” The share of these “false self-employed” in the pool of Spanish journalists grew from 6% to 14% in a year. In Serbia, the country team used the term “forced freelancers” and pointed out that fewer than 55% of journalists had an employment contract (Milutinović, 2024).

Figure 4.4.d. Media viability - map of risks. Sub-indicator Public Incentives to media pluralism



Public incentives to media pluralism. With this sub-indicator, the MPM assesses the existence of public support schemes for the news media sector, as well as their effectiveness. If those schemes do exist, the questionnaire also asks if they cover digital media. Here, only the economic dimension of public support is evaluated, whereas other characteristics, in terms of transparency, fairness and the risks related to the political capture of the media, are considered in the Political Independence area. For this sub-indicator, eight countries are at low risk, nine at medium, and ten at high risk. Only six countries had no public support scheme available for private media (Bulgaria, Germany, Ireland, Romania, Slovakia, and the Czech Republic). The improvement in this sub-indicator (from 58% last year to 56% this year) shows that subsidies to media are seen as increasingly important to guarantee the sustainability of the market, or at least to guarantee the existence of certain forms of content that are considered important for society. This is the case in Estonia, where, in the past, direct subsidies to news media did not exist, but after Russia's invasion of Ukraine, the Ministry of Culture introduced grants to support Russian-language content production online (Palmer & Žuffova, 2024).

Highlighted in many cases, even in countries with a long tradition and an established system of state subsidies, is that the effectiveness and the impact on media pluralism is hard to determine. In Austria, for example, the team explains that the criteria for supporting market diversity and journalistic quality are insufficient, there are no substantial subsidies for digital native media, and the allocation is often skewed towards large companies (Seethaler & Beaufort, 2024). Moreover, the improvements in this sub-indicator are often only temporary, as in the case of Finland, where the risk score improved due to one-off media support for the digital transformation of newsrooms. “This direct support scheme will not be there in the [coming] years, as no permanent direct support mechanism has been introduced by the ruling government of Finland” (Ylikoski & Ala-Fossi, 2024).

4.5 Editorial independence from commercial and owners’ influence

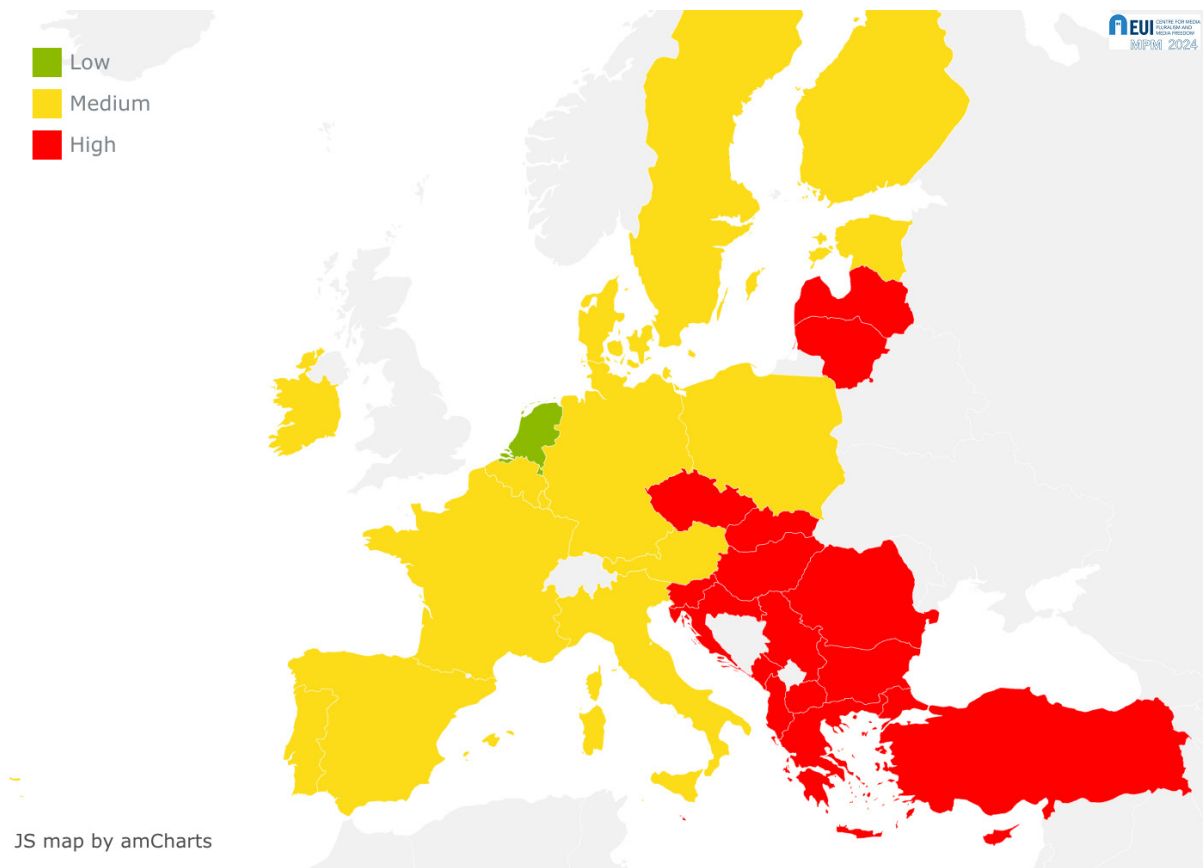
This indicator assesses the risks to media pluralism that arise from the qualitative dimension of ownership concentration, that is, commercial/ownership influence over editorial content. To this end, the MPM variables evaluate a given media landscape in the light of several practices that may undermine editorial freedom. In particular, the indicator includes variables that assess, inter alia: the mechanisms granting social protection to journalists in cases where ownership and/or the editorial line change; rules and/or self-regulation provisions on the appointment and dismissal of the editors-in-chief; laws prohibiting advertorials; regulations stipulating the obligation of journalists and/or media outlets not to be influenced by commercial interests; and, more generally, whether the media in the landscape concerned are governed by practices through which commercial interests dictate editorial decisions. In the MPM2024, new variables have been added, to take into consideration the existence of safeguards for journalists who may encounter pressure from owners or management, as well as the risks that are related to the potential economic interests of owners in sectors other than the media. Moreover, the composition of the indicator has changed, being made up of three instead of just two sub-indicators (see Methodology, Annexe I).

This indicator is composed of three sub-indicators:

- *Integrity of the newsroom*
- *Integrity of content*
- *Owner interests.*

On average, the risk level for the indicator of **Editorial independence from commercial and owners influence** has shifted to high risk. Its score is 68% in the EU+5, three percentage points higher than last year. This change is in part the outcome of methodological changes that aim to better grasp the risks in this area, in line with the European Commission’s Recommendation 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector. The average score of the 27 EU Member States is at 65%, still a medium-risk. The indicator shows that in a vulnerable media environment, newsrooms and media workers are increasingly under pressure from commercial interests, be those of their owners or of their advertisers. As many media entrepreneurs are involved in sectors outside of the media that can benefit from good press coverage or the goodwill of certain politicians, there would be a need for formal protections, but in many cases, these do not exist or are badly enforced.

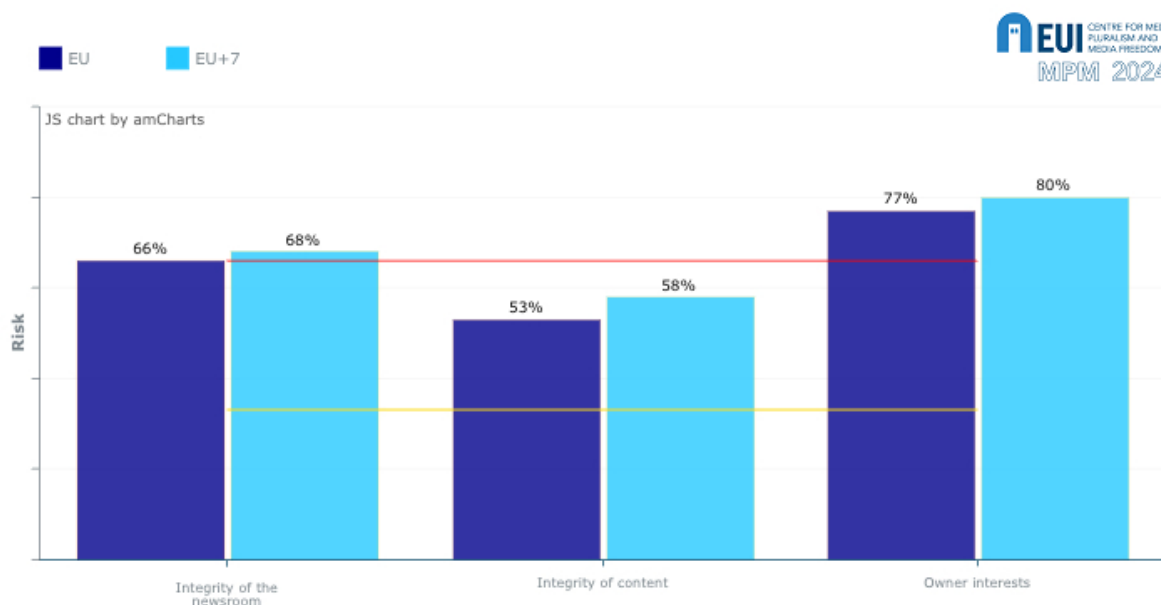
Figure 4.5.a. Editorial independence from commercial and owners influence - map of risks per country



Only one country, the Netherlands, scores low risk on this indicator, while 14 countries have a medium-risk (Austria, Belgium, Denmark, Estonia, Finland, France, Germany, Ireland, Italy, Luxembourg, Poland, Portugal, Spain and Sweden) and 17 a high-risk score (Albania, Bulgaria, Croatia, Cyprus, Greece, Hungary, Latvia, Lithuania, Malta, Montenegro, Serbia, Slovenia, the Czech Republic, the Republic of North Macedonia, Romania, Slovakia and Turkey). In the Netherlands, the country team reported on the existence of a strong system of protections, combined with wide respect for the Dutch Association of Journalists' Code of Conduct. "Editors-in-chief and journalists are protected from arbitrary interference by owners or management through a range of mechanisms, but most centrally through the editorial statutes that individual media outlets have. For public broadcasters, moreover, the media law (Media Act 2008, Art. 3) explicitly prohibits any influence of advertising, sponsoring or product placement on content" (De Swert et al., 2024).

There are often cases in which a country scores medium or high risk on variables in this indicator, despite not encountering major problems in practice; this is because of the lack of formal protections for the case of deteriorations in the economic or political context that could trigger pressure on news media workers. The respect for self-regulatory codes (that are the source of many protections assessed in this indicator) differs across countries. In Denmark, the country team pointed to a good incentive to strengthen self-regulation: "membership in the Press Council is voluntary, but membership is a prerequisite for accessing state support schemes, ensuring widespread acceptance" (Simonsen, 2024).

Figure 4.5.b. Editorial independence from commercial and owners influence – averages per sub-indicator



For the EU+5 Member States, one sub-indicator scores high risk, and two medium, but when looking at only candidates, there are two high-risk sub-indicators and one medium. The highest scoring sub-indicator is *Owner interests*, which is 77% for the EU+5 and 80% for candidates; it looks at whether media owners have significant interests in sectors that are not related to media, and whether such conflicts of interest are disclosed to the public. *Integrity of the newsroom* is below the threshold of high risk for EU members at 66%, but above it at 68% if we look at the average of all the countries in the sample. The sub-indicator *Integrity of content* is 53% for EU members and 58% for all countries assessed.

Integrity of the newsroom. This sub-indicator looks at the existence of protections and responsibilities that ensure journalistic integrity is guaranteed in newsrooms, including protections from owner or management interference and requirements for journalists not to be involved in advertising-related activities.

Only nine countries (Austria, Croatia, Cyprus, France, Italy, Luxembourg, Portugal, Spain, and Turkey) reported having laws or self-regulatory instruments (so-called “conscience clauses”) that provide social protections for journalists who decide to leave an outlet due to pressures stemming from changes of ownership or editorial line. In Italy, the effectiveness of the conscience clause is limited: it allows journalists “to terminate their contracts without forfeiting economic rights (severance pay and notice indemnity) when substantial changes occur in a newspaper’s political orientation or when a situation arises that compromises their professional dignity due to the publisher’s responsibility. However, this provision has limited coverage, particularly failing to protect the growing number of journalists working without formal status or contracts” (Vigevani, 2024). In Cyprus, the problem is “extremely slow administration of justice, which takes many years to complete” (Christophorou & Karides, 2024), while in Turkey, such protections are granted by Article 11 of Law No. 5953 on the Relationship between Journalists and their Employers, but many media owners sign their contracts with journalists under General Labour Law No. 4857, “which deprives them of the rights in the Law No. 5953 such a[s] severance pay and unilateral rescission” (Inceoglu et al., 2024).

The situation is somewhat better when it comes to protections from arbitrary disciplinary actions or dismissals, in cases when journalists refuse assignments that they consider to be against professional standards. Six countries have strong protections (Austria, Denmark, Finland, Germany, Luxembourg, and the Netherlands), and 13 other countries also have measures in place, but their effectiveness is limited (Croatia, Estonia, France, Italy, Latvia, Lithuania, Montenegro, Poland, Portugal, Serbia, Slovenia, Spain, and the Republic of North Macedonia). In Serbia, the new Law on Public Information and Media introduced provisions granting journalists and editors the right to refuse assignments that they consider unethical or would violate the law and forbids news media to publish

articles under one's name if its content was significantly edited without the journalist's consent (Milutinović, 2024). As the EU Whistleblower Directive requires all companies employing more than 50 people to establish their own whistleblowing channels, many EU Member States saw the establishment of such mechanisms. A prominent example is Estonia, where "Delfi/Ekspress Grupp provides a whistleblowing service that is operated by an external service provider and promises complete anonymity for internal whistleblowers" (Palmer & Žuffova, 2024).

In most countries (22) there are no regulatory safeguards (laws, internal bodies or self-regulatory instruments) that would ensure decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests. However, in some countries with no self-regulation on this issue, there were news media that decided to introduce democratic structures in their management giving journalists a say in who the right person would be to lead the newsroom: the Hungarian country team, for example, mentions the news website *Telex*, where journalists were enabled to vote for their preferred candidate for editor-in-chief (Bleyer-Simon et al., 2024a). As an example of a model of media operation that can empower newsrooms in the face of commercial and owner pressures, the French country team mentioned the case of *MarsActu*, an outlet that was bought by its journalists and adopted the specific status of a "solidarity press company" [entreprise solidaire de presse d'information], which allows tax deductions for donors, and requires the company to reinvest most of its profits in its operation. "This new status could prove beneficial for small, local, independent media, especially to maintain their editorial independence" (Ouakrat & Sklower, 2024).

In most countries, there are laws or self-regulatory measures stipulating that the exercise of the journalistic profession is incompatible with activities in the field. It is also, in many cases, emphasised in (self-)regulation that journalists cannot be mandated to work on the production of commercial material (such as native advertising, which is in the grey zone between commercial and editorial content). Still, the effectiveness of these measures is seen as limited in most contexts. In Ireland, a scandal broke as it became public that journalists of the public service *RTE* (Raidió Teilifís Éireann) received payment from external sponsors. "It emerged that several *RTE* presenters who also acted as 'brand ambassadors' for commercial products (notionally in a private capacity) were found to have conducted promotional activities while on the broadcaster's premises" (Flynn, 2024).

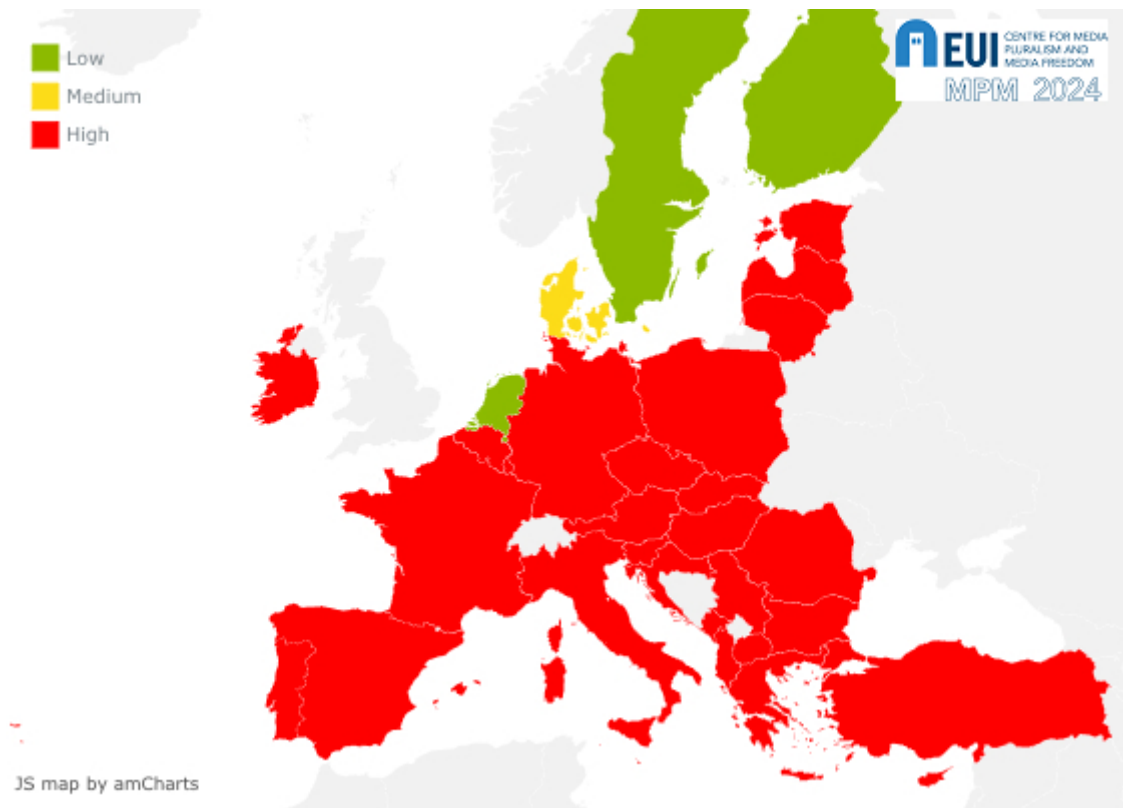
Integrity of content. In general, there is a consensus across countries that journalists should not represent commercial interests. Laws and self-regulation in most countries highlight that journalists should withstand influence from commercial entities and that advertising should be labelled in all cases so that audiences can easily differentiate between editorial and commercial content. Still, there are frequent cases when the news media disrespect these rules. Country teams from all parts of the EU, and across candidate countries reported on news media being fined by regulators or receiving reprimands from press associations or councils for publishing hidden advertising, showing that despite regulations asking everywhere for clear labelling of advertising, the practice is still far from perfect. Many country teams refer to the opaque sponsorship deals of influencers, while Vigevani et al. (2024) mention loopholes used by established Italian media, which create special sections, called “guides” or “specials”, where audiences can be misled about whether or not a given piece of content is paid-for or genuine journalism.

The norm of separation between editorial and commercial content, which used to be seen as “fundamental to the self-understanding of professional journalism” (Coddington, 2015, p.67) is only codified or formally applied in very few cases across the EU and candidate countries, as the financial wellbeing of newsrooms becomes increasingly a concern for content producers as well.

Fifteen countries scored high risk on the variable asking whether editorial content is independent from commercial influence in practice (Albania, Bulgaria, Croatia, Cyprus, Greece, Hungary, Montenegro, Lithuania, Romania, Serbia, Slovakia, Slovenia, the Czech Republic, the Republic of North Macedonia and Turkey). Often the risk of commercial interference is disputed in countries, even by some members of the Group of Experts reviewing the data collection, as failed attempts to influence content or subtle mechanisms may not be visible to observers. In the case of Slovakia, Urbániková (2024) mentions that “[s]ystematic data or reports on the commercial influences on editorial content are lacking. However, there is, for instance, anecdotal evidence that the News and Media Holding publishing house, the leader in the print and online media segment, may be covertly promoting other business interests of its owner through its newspapers and magazines”. In Estonia, which is a country that scored medium-risk, interviewees told the MPM country team that outlets of the Postimees Group provided favourable coverage of the owner’s interests (Margus Linnamäe is a businessman with a strong political agenda and involvement in a medicine wholesaler, pharmacies, and cinemas), but it was hard to find evidence that this is indeed the outcome of interference or commercial pressure. The reason for medium-risk, in the end, was that the team was provided with proof of a large company withdrawing advertising from a news media outlet that published an investigative article that seemed to hurt its economic interests (Palmer & Žuffova, 2024). While the incident was not widely known or reported, such a case can trigger self-censorship in favour of a dominant commercial interest group.

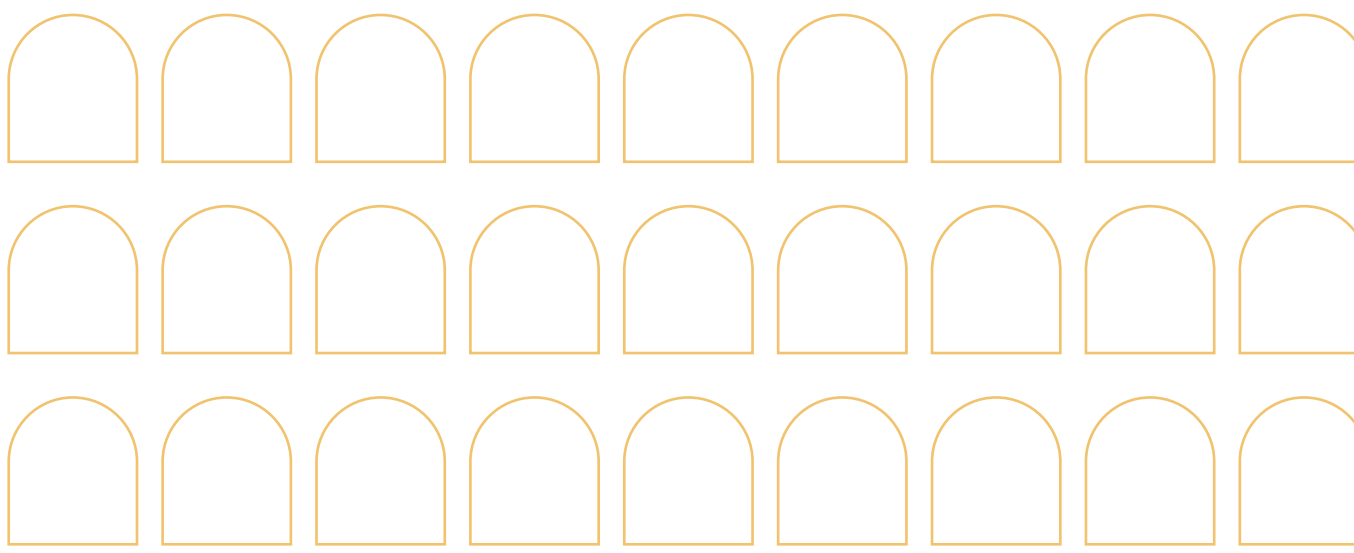
The severity of commercial pressure on content is also substantiated by the self-perception of those working in the profession. Where available, surveys of journalists show that a significant segment of the journalistic population feels that advertising-related considerations influence their work. In the case of Lithuania, for example, 54% of surveyed journalists said so in 2023 (Jastramskis & Balcytiene, 2024). In Spain, only 24% of surveyed journalists said they had not experienced pressure “either from their own company or from external economic and political agents” (Suau-Martinez et al., 2024). In many countries, commercial interest is intertwined with political interest, as wealthy entrepreneurs might be interested in influencing elections or political decisions, political interest groups or the state might capture media outlets, or state actors might have an influence on the advertising market.

Figure 4.5.c. Owner interests - map of risks per country



Owner interests. The sub-indicator on owner interests scores high risk in 28 countries. Only Finland, Sweden, and the Netherlands are considered low risk, and Denmark is medium-risk. It is common that media owners have significant interests in other sectors, such as real estate, construction, banking, telecommunications, and gambling. Only four countries (Denmark, Finland, Sweden, and the Netherlands) reported that their market leaders were only investing in sectors that were connected to the media. Having interests in other sectors constitutes a risk for media pluralism, as media outlets might provide biased coverage of their owners' other businesses; moreover, if those businesses are dependent on public contracts or might be subject to strict regulation, the economic interests can easily be translated into political favours that can undermine the media's watchdog function. Furthermore, powerful interests can also be considered a barrier to media reform, as the example of the Republic of North Macedonia shows: "Throughout 2023, as the process of EU-backed media legislation reforms was unfolding, pressures by media owners of the most influential media were particularly visible, openly jeopardising the integrity of media content" (Micevski & Trpevska, 2024).

Apart from the existence of such conflicts of interest related to owners and their businesses, a further risk was recorded related to the opaqueness of such relations. In countries where media owners have significant non-media businesses, there are barely any practices of disclosure of actual or potential conflicts of interest of the owners that might affect the editorial content. At the same time, it has to be mentioned that small media outlets that rely on (local or foreign) philanthropic donors (which at times may be also considered external influences) usually list their institutional donors on websites, and in certain cases, disclaimers can be seen under specific articles (for example, in the case of independent news media in Hungary, see Bleyer-Simon, et al., 2024a).



5. POLITICAL INDEPENDENCE

The Political Independence area explores the potential shortcomings and risks in relation to the conditions that should guarantee political pluralism of the media in a country. The key conditions against which the risks to political independence are assessed, include the existence and effectiveness of regulatory and other safeguards against political control over media outlets and news agencies, as well as against political bias and the misuse of media and online platforms in elections. The indicators also look into the existence and effectiveness of self-regulation in ensuring editorial independence and seek to evaluate the influence of the state (and, more generally, of political power) on the functioning of the media market. Finally, they assess the independence of public service media. The five indicators that are related to political independence are:

- *Political independence of the media*
- *Editorial autonomy*
- *Audiovisual media, online platforms, and elections*
- *State regulation of resources and support to the media sector*
- *Independence of public service media.*

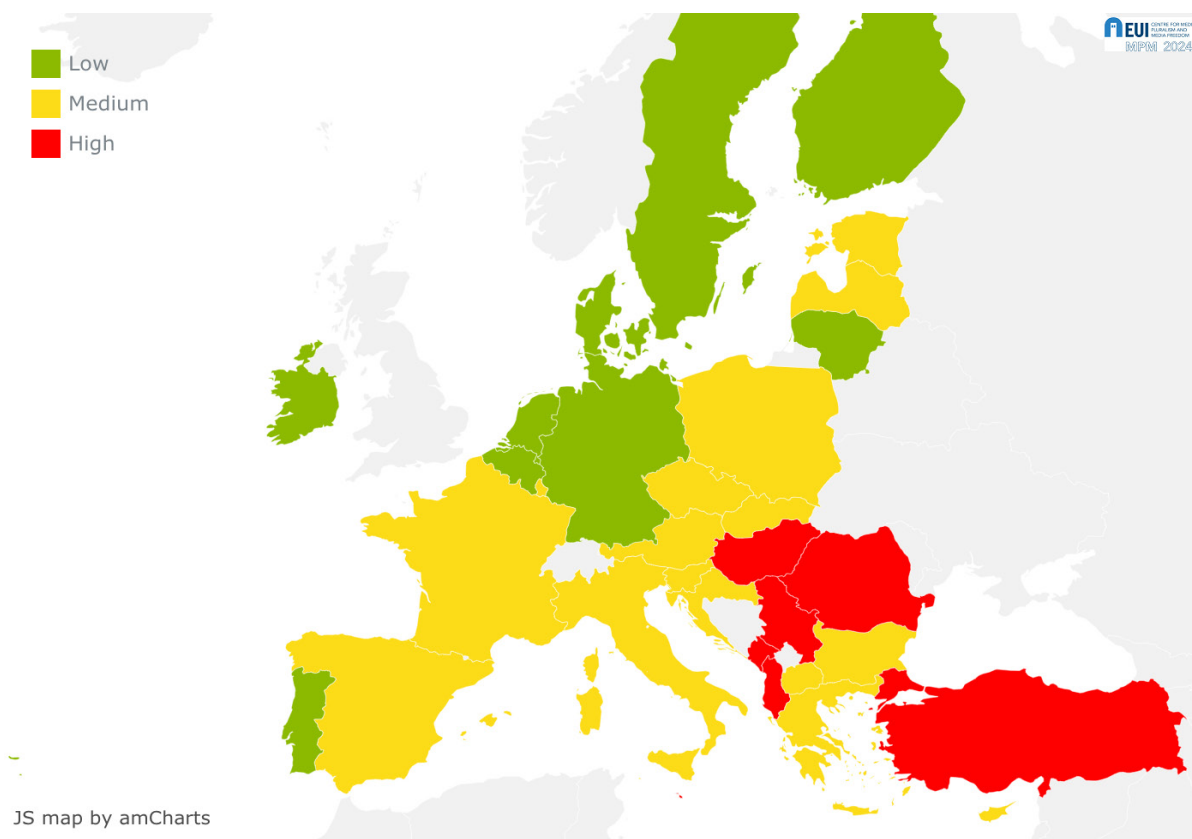
The risk for the **Political Independence** area remains stable, compared to the 2023 edition of the MPM, with a medium-risk of 48%. This result is in line with other previous MPM editions as well (MPM2022 - 49%, MPM2021 - 48%, MPM2020 - 47%), and confirms the significant degree of politicisation of the media across the European Union and candidate countries.

The present assessment detects nine countries to be at a low-risk level: Belgium, Denmark, Finland, Germany, Ireland, Lithuania, the Netherlands, Portugal, and Sweden. Sixteen countries are at medium-risk: Austria, Bulgaria, Cyprus, Croatia, the Czech Republic, Estonia, France, Greece, Italy, Latvia, Luxembourg, Poland, the Republic of North Macedonia, Slovakia, Slovenia, and Spain. The countries with high-risk scores are Albania, Hungary, Malta, Montenegro, Romania, Serbia, and Turkey.

Compared to the previous year, some countries experienced a notable shift from one risk zone to another. Specifically, Lithuania improved to the low-risk band, mainly due to positive developments under the indicator assessing the independence of the PSM. Poland also registered an improvement from the high to the upper medium-risk band, stemming from a combination of factors which reduced the risk score in most of the indicators. Vice versa, Estonia and Montenegro moved to the medium and high-risk bands, respectively. For the Baltic country, the reason stems from the lack of relevant checks and balances detected in some subfields of the Estonian media system. As for Montenegro, the country registered increased risk values for three out of the five indicators investigated in the **Political Independence** area (**Audiovisual media, online platforms and elections, State regulation of resources and support to the media sector, and Independence of public service media**). Although remaining in the same risk band, Portugal was subject to a significant risk increase of 11 percentage points, because of concerns over the implementation of protections against conflict of interest, new elements of risk in the radio sector, and the Lusa news agency.

As identified by Figure 5.a, most of the countries presenting a high or upper-medium-risk score are concentrated in Central and Southeastern Europe. These countries are particularly representative of a situation where the media system is significantly captured by political power through a combination of direct and more subtle means, ranging from ownership control to the biased distribution of state resources. While this is also consistent with the results of the previous MPM implementation, it must be underlined that significant evidence of political capture is detected across the whole Old Continent, although at a lower intensity, or only in some of the specific subfields investigated.

Figure 5.a. Political Independence area – map of risks per country

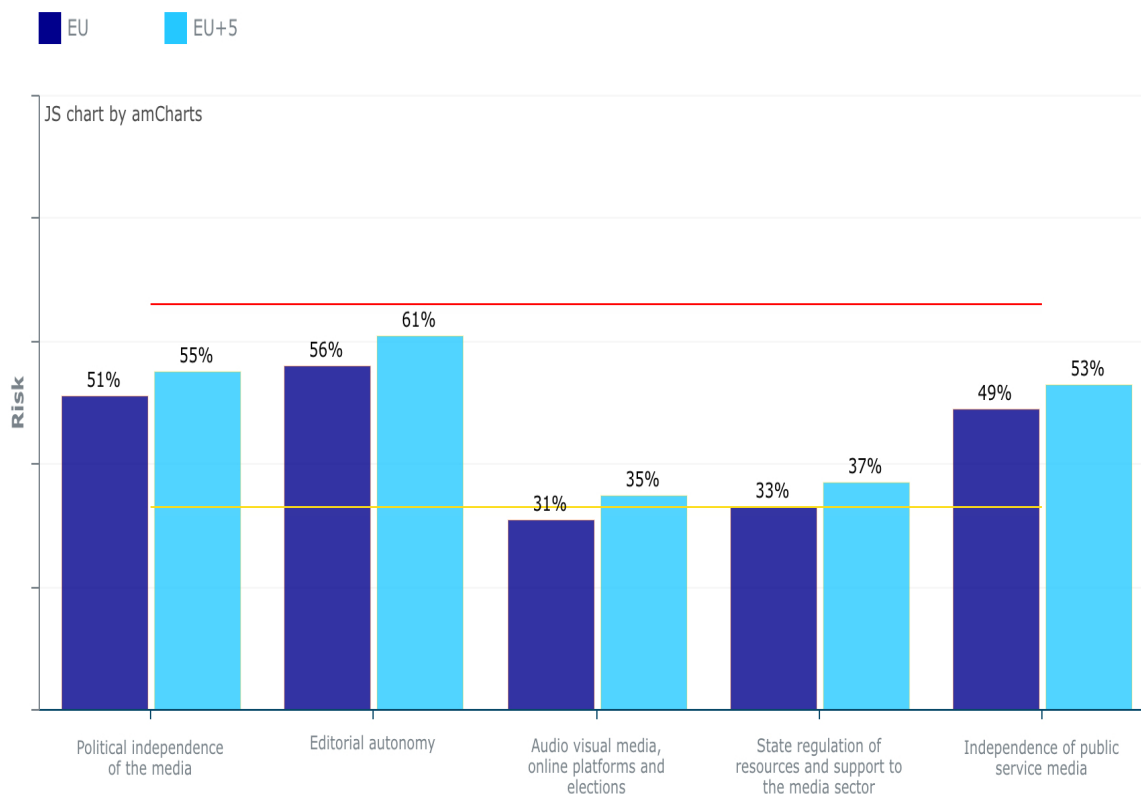


While the aggregate result for the **Political Independence** area registered no variations this year, a closer examination at the indicator level reveals both positive and negative evolutions.

When considering the whole range of countries assessed, the indicators of **Political independence of the media** (55%), **Editorial autonomy** (61%), and **Independence of public service media** (53%) all have increased by one percentage point, while the indicator **Audio visual media, online platforms and elections** (35%) presented a decrease by the same value. As for the indicator **State regulation of resources and support to the media sector**, this remained stable with a medium-risk of 37%.

When considering the EU results only, the risk has instead increased by one percentage point for the indicator **Editorial autonomy** (56%) and decreased by the same amount for the indicators **Audio visual media, online platforms and elections** (31%) and **State regulation of resources and support to the media sector** (33%). A more granular overview of the evolution of these aggregates is provided in the sub-chapters for each of the five indicators.

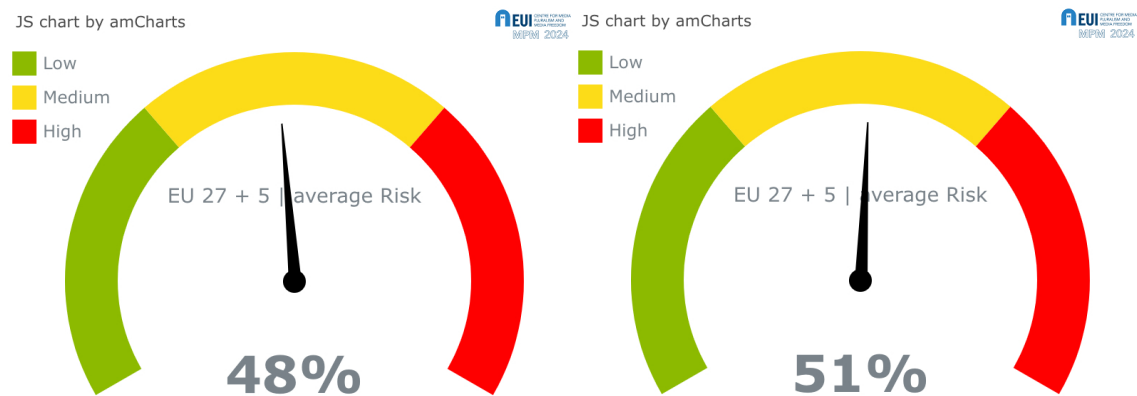
Figure 5.b. Political Independence area - averages per indicator



Over the years the **Political Independence** area has evolved to consider the risks related to the digital environment. More specifically, eight digital variables were distributed across three indicators to investigate the extent of political control that might be exerted over digital native media, the risks related to political advertising in online media and social media platforms, as well as that the funding adequately covers the online mission of Public Service Media (PSM) without distorting competition with private media actors.

Compared to the MPM 2023, the average risk score of the digital variables for all the countries covered has decreased by two percentage points, indicating a medium-risk level of 51%, which is three percentage points higher than the overall score for the area (48%). Like the previous implementation, this is mainly due to the lack of regulation, transparency, and oversight when it comes to political advertising that is purchased and distributed in the online environment.

Figure 5.c. Political Independence area - average risk – Overall/Digital



The situation presented above opens to several considerations, which will be explained in detail in the following pages. First, it is confirmed that the European media sphere is still significantly affected by high levels of political capture exerted through “traditional” mechanisms of control. The risk increases in the indicators of **Political independence of the media**, **Editorial autonomy**, and **Independence of public service media** prove—once again—that the mutually corrupting relationship between political actors, media owners, and editors-in-chief, cannot be easily relinquished. As direct ownership from a governing politician might be strategically inconvenient—depending on the political culture and availability of conflict of interest and/or specific media regulations across the EU and candidates—proxy ownership has become one of the major mechanisms for subtly controlling a given media. This has a direct impact on the indicator of **Editorial autonomy**, which remains the worst scoring within the area. In most of the European countries, no common regulatory safeguards that would guarantee fair and transparent appointments and dismissals of editors-in-chief from media owners are found. Besides, several cases of interference in the editorial process are observed. The high and increasing risks noticed under the indicator **Editorial autonomy** are also inflated by the severe concerns that are persistently detected under the indicator of **Independence of public service media**, with governance appointments being the primary subject of political bargaining.

5.1 Political independence of the media

This indicator assesses the availability and effective implementation of regulatory safeguards against conflicts of interest and control (both direct and indirect) over different types of media by politicians, taking into consideration the diversity of European media systems and the cultural differences among the countries examined. The indicator consists of three sub-indicators: the first relates to the general rules on conflict of interests; the second aims to capture political control over audiovisual media, radio, newspapers, and digital native media; and the third evaluates political control over news agencies. Here, control is understood as being broader than ownership, as it includes both direct ownership and any form of indirect control. Indirect control implies that parties, partisan groups, or politicians are not directly involved in the ownership structure, but that they exercise power through intermediaries (e.g., family members or friendly businesspeople). Conflict of interest is defined as being an incompatibility between holding government office and owning media (Djankov et al., 2003). The MPM, therefore, takes into consideration the existence, and effectiveness, of those rules that prohibit media proprietors from holding government office, as well as the situation in practice. Transparency of media ownership, and the availability of information on the political affiliation of media owners, are therefore key preconditions for assessing the extent of the politicisation of control over the media.

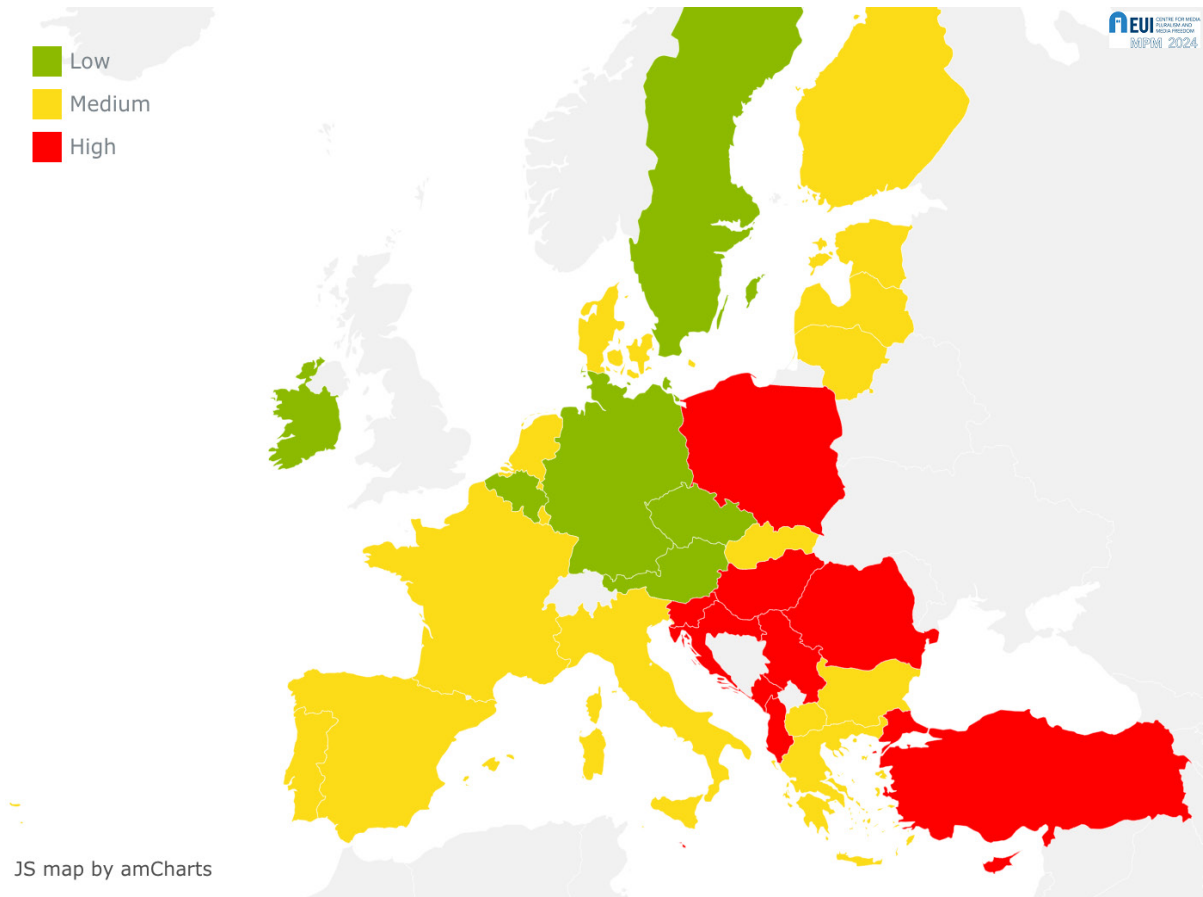
The average risk for the indicator **Political independence** of the media is 55%, which is the medium-risk band, with a one percentage point increase this year. As with the previous implementation, the MPM2024 detects eleven countries in the high-risk zone, fifteen countries in the medium-risk band, and six at a low level of risk.⁴⁰ As illustrated by Figure 5.1.a, Central and Southeastern Europe is identified once again as the region more plagued by political control exerted via ownership means, whether direct or indirect.

For this edition, notable shifts from one risk band to another are observed for Portugal, and the Czech Republic. For Portugal, the value moved from a low to a medium-risk band (40%) because of heightened concerns over the implementation of protections against conflict of interest, as well as new problematic elements in the radio sector, and with the Lusa news agency. As for the Czech Republic, the improvement to the low-risk band reflected the amendment to the Conflict of Interests Act (Nr 159/2006 Coll.) and the subsequent sale of Andrej Babiš' media assets.

40 Countries in the high-risk band: seven EU Member States (Cyprus, Croatia, Hungary, Malta, Poland, Romania, and Slovenia) and four candidate countries (Albania, Montenegro, Serbia, and Turkey). Countries in the medium-risk band: Bulgaria, Denmark, Estonia, France, Finland, Greece, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Portugal, the Republic of North Macedonia, Slovenia, and Spain. Countries at low-risk are: Austria, Belgium, the Czech Republic, Germany, Ireland, and Sweden.

Relevant variations are observed for other countries as well, although these did not determine the shift from one risk band to another. For instance, in Cyprus, the lifting of almost every barrier against ownership control from the law on Radio and Television Organisations of 1998 provoked a further augmentation in the risk level. Similar concerns were detected in Serbia, with the introduction of a provision enabling state-owned companies to establish and purchase media outlets. In Montenegro, the media landscape is “politicised and polarised along the political lines of dominantly pro-Serbian parties that came into power in 2020. In the aftermath of this political change, through several major acquisitions, all commercial TV stations with national frequency came under foreign (Serbian) ownership” (Brkić Ružić, 2024, p. 19).

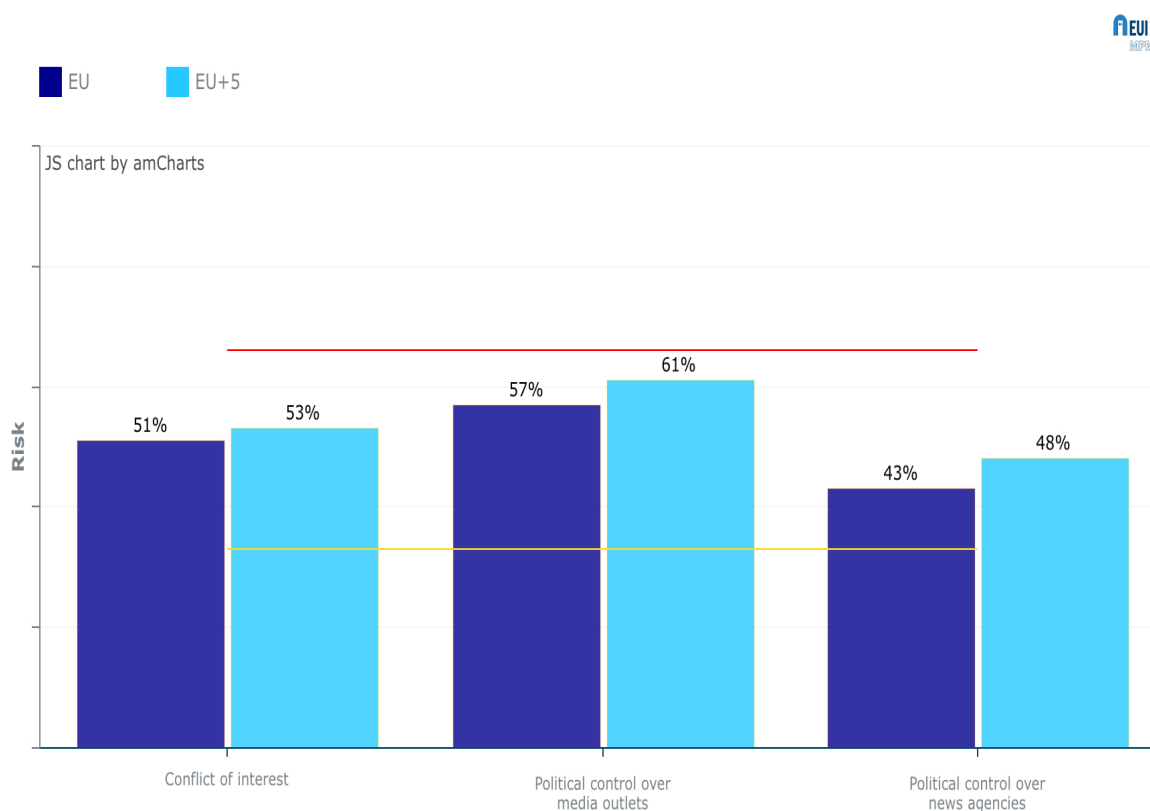
Figure 5.1.a. Indicator on the Political independence of the media - map of risks per country



The analysis at the sub-indicator level is further explicative of the mechanisms used by political power to influence editorial output, or, vice versa, of the influence that media owners can project on politics to pursue their non-media interests. The representations of risk illustrated below, are specific to one major dimension of the media capture phenomenon, namely the control that is exerted via direct ownership means, or the indirect ownership control that may happen through intermediaries, such as family members and friendly businesspeople. When this control is exercised by politicians holding government office, this converts into a conflict of interest. The assessment of this indicator also concentrates on the political control that might be exerted on news agencies, including the pressures that can be strategically grafted through governance and funding procedures.

In terms of distribution of the sources of risk, the sub-indicator *Political control over media outlets* remains the highest scoring one (61%), followed by *Conflict of interest* (53%) and *Political control over news agencies* (48%). All three sub-indicators fall within the medium-risk band. In this context, the one percentage point increase of the indicator is due to a combination of factors at the level of the sub-indicator *Political control over news agencies*, which increased by three percentage points.

Figure 5.1.b. Indicator on the Political independence of the media - averages per sub-indicator

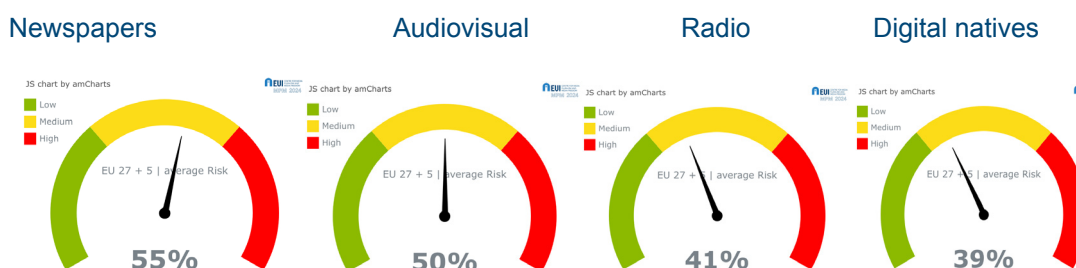


Looking specifically at the sub-indicator *Conflict of interest* (53%), this registered a one percentage point decrease, in turn depending on a slight improvement (3 percentage points) of the aggregate value for the variable measuring the extent of conflict of interest in the media sphere, in practice. As introduced above, one major improvement this year took place in the Czech Republic, which had a diminished risk following the latest amendment to the Conflict of Interests Act. (Nr 159/2006 Coll.). As explained by Štětka et al. (2024), while public officials such as MPs, senators, ministers, and mayors were already prohibited from owning a news medium, the 2023 amendment clarified that beneficial owners are included in the provisions. As a consequence of this, former prime minister Andrej Babiš was forced to release his media stakes.

At the same time, the analysis confirms that more than a third of the European media systems investigated (12) are characterised by significant concerns under this sub-indicator, mostly reflecting either the absence or the deficiency, of regulatory safeguards against the eventuality of conflict of interest. The most blatant case of conflict of interest in the European Union is represented by Malta. As reported by the Maltese national researcher, “The law does not exclude partisan ownership, and major political parties continue to own and run television stations, newspapers, radio stations and news websites. Given that political parties retain their cross-media ownership, and careers in these media houses serve as launchpads for political careers (revolving door), the continuing popularity and dominance of partisan media continues distorting the media landscape” (Repeckaite, 2024: 20). In Serbia, a legal exception lifted the prohibition for some state-founded entities to own media. According to Milutinović (2024: 26), “contrary to the Media Strategy, an exception to the rule that the Republic, autonomous province, or local government unit, as well as other entities in public ownership, cannot be media owners, has been provided by the new LPIM provisions (in Art. 39, Para. 5, point 2). It prescribes that this prohibition does not apply to legal entities whose founder is engaged in electronic communications activities”. Likewise, in Cyprus almost every barrier against ownership control was lifted from the law on Radio and Television Organisations of 1998. Christophorou & Karides (2024: 20) report that “With the latest amendment ownership thresholds and other constraints that previously applied to all persons, including politicians, now, allow anyone to own and control media without excluding, in any way, politicians from ownership/shareholding and/or control of radio and television, or even vertical ownership. No mention either of politicians in office”.

The sub-indicator *Political control over media outlets* remains the worst-scoring one, among the dimensions investigated under the indicator, with an upper medium-risk of 61%. Although the aggregate risk level has remained stable, compared to the previous MPM edition, the analysis of political control over different media typologies shows increased risks for all the media sectors, except for the digital native media, in a slight decrease. More specifically, the results confirm the newspapers as the type of media that is most affected by ownership control (55%, with an increase of two percentage points), followed by the audiovisual sector (50%, with an increase of two percentage points), the radio (41%, with a one percentage point increase), and digital native media (39%, with a two percentage points decrease).

Figure 5.1.c. Sub-indicator on Political control over media outlets - average risk score by sector:



More than direct ownership control—which at least for the main news outlets, occurs rarely across the EU and candidate countries—the major problem is represented by indirect or proxy ownership, through which active political actors can easily circumvent conflict of interest and/or other media-specific regulations. Most of Central and South-eastern Europe is at high risk, under these terms. In Turkey, more than two-thirds of the private commercial sphere is dominated by politically affiliated business groups (Erbaysal Filibeli et al., 2024). In Serbia, the major media across all sectors are owned and managed by people known as supporters of the ruling SNS (Milutinović, 2024). In Hungary, control via proxies, government-aligned investors, and business ties, is cited by the country team as “one of the main characteristics of the Hungarian media market” (Bleyer-Simon et al., 2024a: 27). In Slovenia, the country team reported evidence from the investigative commission of the National Assembly, that some media entities received financing from construction companies, in exchange for concessions for regulating watercourses during the government of Janez Janša (Milosavljević & Biljak Gerjevič, 2024).

For this 2024 edition of the MPM, notable variations in the risk band are detected for Latvia, Portugal, and the Czech Republic. Latvia has moved from the medium to the high risk because of concerns detected for the biggest newspapers; vulnerabilities have emerged also for smaller players (Rožukalne & Skulte, 2024). For Portugal, the country team has highlighted how the shortcomings detected in the Transparency Portal database—where many media companies submit only general data—“aggravate the risk of conflict of interest, both at the national and the regional/local level” (Cádima et al., 2024: 19). As for the Czech Republic, the risk has decreased to the upper low-risk band, due to the above-mentioned relinquishing of Andrej Babiš’ media assets.

While the analysis locates most of the risks in Central and Southeastern Europe, significant levels of indirect political capture via ownership means are detected in Western Europe, too. The most striking cases are in France (high risk) and Italy (upper medium-risk). In France direct political control is scarce, but the indirect control that Bolloré exerts over the mediascape is a significant matter of concern (Ouakrat & Sklower, 2024). In Italy, the parliamentarian Antonio Angelucci indirectly controls a right-wing pole composed of the newspapers *Libero*, *Il Tempo*, and *Il Giornale*, the latter acquired from the Berlusconi family in 2023. At the beginning of 2024, news emerged of his plans to acquire one of the leading news agencies in Italy, AGI. As for the television and radio sector, the risk appears to persist in spite of Berlusconi’s departure in 2023 (Vigevani et al., 2024).

The sub-indicator *Political control over news agencies* scored a medium-risk of 48%, a slight increase compared to the previous assessment. This reflects a combination of factors, such as the persistence of very high-risk values in some countries (e.g. Albania, Cyprus, Hungary, and Turkey), both positive and negative variations, as well as methodological reconsiderations, operated in some countries (e.g. Bulgaria and Latvia), which ultimately contributed to the risk increase. Worsened results were detected for Portugal, where delays in the transfer of funds provoked the annulment of investments in digital transformation and the fight against disinformation. Moreover, the deal for the purchase by the state of 45.7% of the share capital of Lusa, which would have included the agency’s future services within a framework of public support, has failed following the fall of the government in November 2023 (Cádima et al., 2024).

Some improvements have occurred with the independence of news agencies in Poland and Slovenia, despite the persisting high-risk situation. Following the change of management and head of PAP (the Polish Press Agency), some positive initiatives, such as the introduction of editorial standards for the whole agency, were reported to have taken place (Klimkiewicz, 2024). As for the Slovenian Press Agency (STA), the country team reported the improvement of the situation, after a contract determining a ten per cent

increase in financing was signed with the government. A criminal complaint was also filed against Uroš Urbanija, the former director of the Government Communications Office, for the non-payment of the public service of STA (Milosavljević & Biljak Gerjevič, 2024). In Italy, a more positive evaluation has followed the reform introduced with Article 17 of the decree-law of 29 December 2022, no. 198, and with the Presidential Decree of 11 July 2023. However, the intention of Angelucci to acquire one of the major Italian agencies, AGI, throws relevant concern on the sector (Vigevani et al., 2024).

5.2 Editorial autonomy

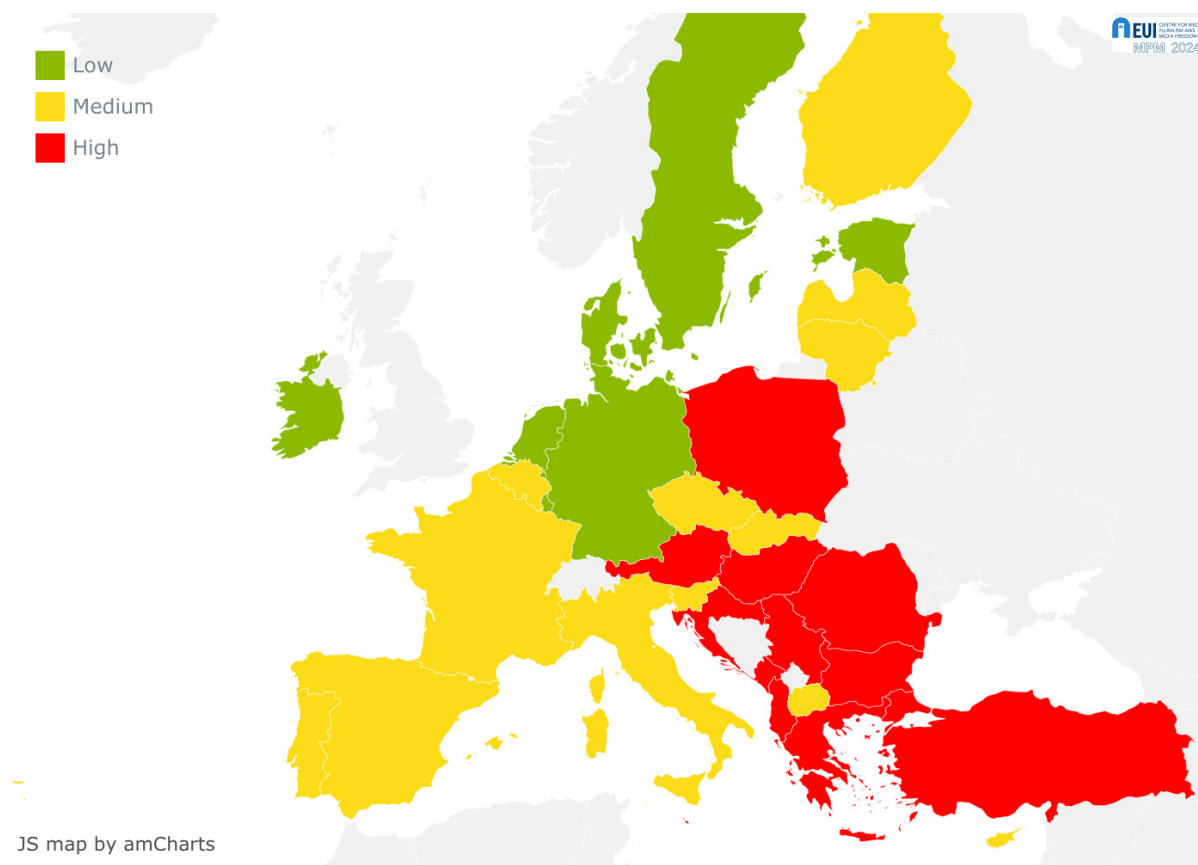
*The indicator on **Editorial autonomy** is designed to assess the existence and effectiveness of regulatory and self-regulatory measures that guarantee freedom from political interference in editorial decisions and content. In order to exercise their social role as the watchdogs of society, and as providers of information that serves the public interest and debate, journalists have to be able to act independently of undue influence. In this regard, effective self-regulation, in the form of codes of conduct, codes of ethics or editorial statutes, is of particular importance, as are the rules that guarantee the fairness of the appointment of, and the dismissal procedures for, editors-in-chief. The importance of co- and self-regulation, as a complement to legislative, judicial, and administrative mechanisms, is emphasised in the Audiovisual Media Services Directive (2018). The Council of Europe's Recommendation on Media Pluralism and the Diversity of Media Content (CM/Rec(2018)1) highlights that, while encouraging the media to supply the public with diverse and inclusive media content, Member States should also respect the principle of editorial independence. In this context, the recently adopted European Media Freedom Act, in Art. 6(3) provides novel instruments for guaranteeing editorial independence of the newsrooms, including the Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector.*

The indicator **Editorial autonomy** scores a medium-risk of 61%, which improves to 56% if only EU Member States are considered. This indicator remains the worst scoring of the five dimensions assessed in the **Political Independence** area. Furthermore, it increased by one percentage point also this year, getting closer and closer to the high-risk threshold. This result indicates the increased degree of dependency of the editorial line on the political activity of the owners/publishers across the EU and candidate countries, of external political influences on journalistic work, as well as the fragility of self-regulation against undue attempts to influence editorial content. The risks identified over editorial autonomy can also be considered as the ultimate combined effect of the concerns

detected under several indicators in the **Political Independence** area, such as political ownership, the unfair and non-transparent distribution of state resources, as well as the influence that is exerted from the top over editorial newsrooms, through governance and funding procedures in PSM. The 2024 assessment detects 12 countries at a high-risk level (Albania, Austria, Bulgaria, Croatia, Greece, Hungary, Malta, Montenegro, Poland, Romania, Serbia, and Turkey), 13 at medium-risk (Belgium, Cyprus, the Czech Republic, Finland, France, Italy, Latvia, Lithuania, Portugal, the Republic of North Macedonia, Slovakia, Slovenia, and Spain) and only seven at low risk (Denmark, Estonia, Germany, Ireland, Luxembourg, the Netherlands, and Sweden).

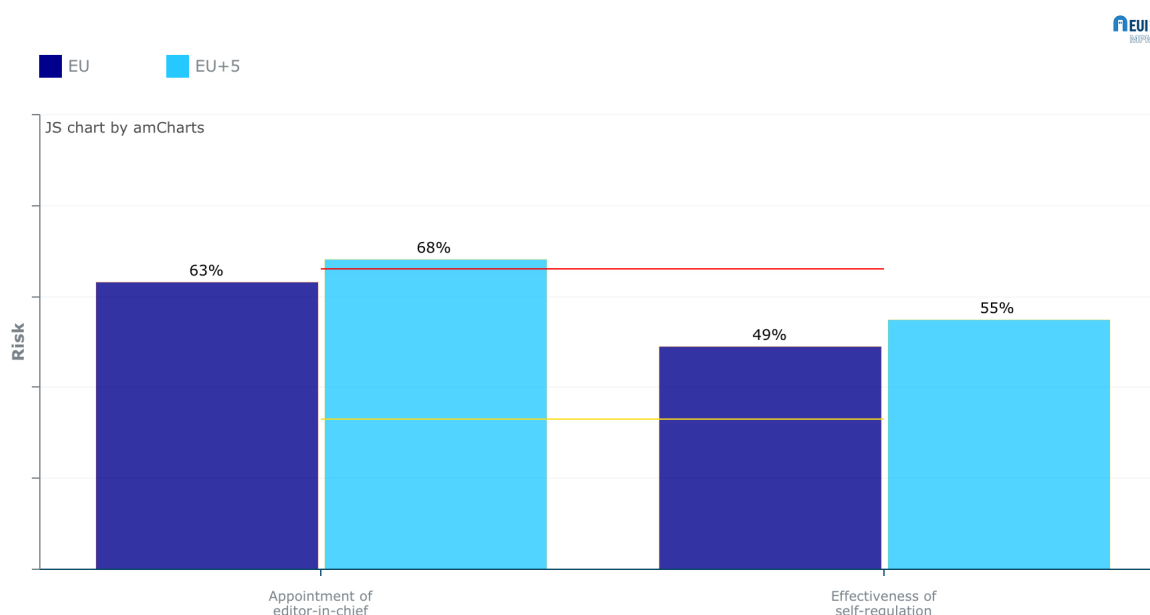
Compared to the previous year, Lithuania and Spain have improved from the high to the medium-risk level. While for Spain the risk was lowered following a methodological reconsideration, in Lithuania the result stemmed from the new data of a representative survey of Lithuanian journalists, according to which political influence over the work of journalists has been experienced at a high intensity by less than a tenth of them (Jastramskis & Balčytienė, 2024). Contrarily, Austria worsened from the medium to the high-risk band, as per the reported lack of transparency over the appointment and dismissal procedures of editors-in-chief (Seethaler & Beaufourt, 2024). Belgium also had an increased medium-risk band, as several cases emerged of journalists being criticised by political actors, something that risks undermining public confidence over journalistic work (Valcke & Wauters, 2024). Even for this indicator, the geographical representation below clearly indicates Central and Southeastern Europe as the area most at risk.

Figure 5.2.a. Indicator on Editorial autonomy - map of risks per country



The analysis of the averages per sub-indicator reveals that the drivers for the indicators' increase this year are to be identified within the sub-indicator *Effectiveness of self-regulation*, which is designed to capture the existence of self-regulatory measures—defined, e.g., as journalistic codes, codes of ethics—and their effectiveness in practice. When considering EU countries only, the sub-indicator was subjected to a three percentage points deterioration, and to a two percentage points deterioration when considering EU and candidate countries. At the same time, the overall risk detected for the indicator **Editorial autonomy** remains mainly driven by the sub-indicator *Appointment of editor-in-chief*, which is specifically intended to assess the existence of regulatory safeguards preventing influence, both in the appointment and dismissal of editors-in-chief, that might harm editorial autonomy, as well as actual practice. Like the previous year, it presented an overall high risk of 68% (which improves to a medium-risk level of 63%, when considering EU countries only).

Figure 5.2.b. Indicator on Editorial Autonomy - averages per sub-indicator



A detailed analysis of the sub-indicator *Appointment of editor-in-chief* reveals that common regulatory safeguards (e.g. law, statute) preventing political influence over the appointments and dismissals of editors-in-chief are lacking in most of the countries under analysis; even where available, these appear far from being comprehensive. In Croatia, where the opinion of the editorial board is required before the publisher appoints/dismisses an editor-in-chief, no explicit reference for guaranteeing autonomy from politics is provided by the Media Act (Bilić & Petričušić, 2024). In Slovenia, autonomy is cited in irrelevant legal provisions, but according to the country team, these prove frequently ineffective (Milosavljević & Biljak Gerjević, 2024). In the Republic of North Macedonia,

such safeguards were initially introduced in the December 2013 Law on Media but were removed right after through an amendment. In 2023, a group of experts drafted new proposals aimed at re-introducing these guarantees, but the process has not been concluded (Micevski & Trpevska, 2024).

As demonstrated by several cases across the EU and candidate countries, the lack of regulatory safeguards can have detrimental implications for the triadic relationship involving editors-in-chiefs, media owners, and political actors. In Montenegro, for example, political changes over the past years had a direct effect in terms of media ownership and, subsequently, editorial policy (Brkić Ružić, 2024). In Albania, the country team reported for 2023 at least three cases of biased appointments and dismissals of editors-in-chief, related to change of management or more in general connected to political interference (Likmeta & Voko, 2024). In Italy, the 2023 appointment of the former head of the press office of the Prime Minister as editor-in-chief of *Liberò*, was seen as part of a larger plan in support of the Meloni government (Vigevani et al., 2024).

As already introduced, the sub-indicator *Effectiveness of self-regulation* was subjected to a three percentage points deterioration when considering the EU 27 only, and to a two percentage point increase when considering the EU and candidate countries. This indicates an increased fragility of self-regulatory instruments aimed at protecting editorial content from undue political considerations. Within the EU, increased scores were detected for Portugal, Latvia, and Belgium, while other countries also maintained significant risk levels. In Portugal, the digital native sphere is reported to lack self-regulatory safeguards, such as newsroom councils, considered inactive also in many regional and local newspapers and radio stations (Cádima et al., 2024). In Latvia, a reported survey published by the Media Ethics Council (LMĒP/SKDS), showed that the practical consideration of ethical charts is rather cosmetic (Rožukalne & Skulte, 2024). In Austria, editorial statutes are provided by law only for TV and radio stations, and numerous revelations have emerged in recent times proving pressures on editorial work (Seethaler & Beaufort, 2024).

5.3 Audiovisual media, online platforms and elections

The indicator on Audiovisual media, online platforms and elections assesses the availability and implementation of a regulatory and self-regulatory framework for the fair representation of different political actors and viewpoints on both public service media (PSM) and private channels, especially during electoral campaigns. The indicator also examines the regulation of political advertising in audiovisual media, as well as the availability and adequacy of regulation and self-regulation, to ensure the transparency of political advertising online and on online platforms. The focus is on those risks that are related to bias in the audiovisual media, since television continues to be the most used form of media amongst Europeans (Standard Eurobarometer 96, Winter 2021-2022). However, as roughly two-thirds (67%) of Europeans read the news online at least once a week (Standard Eurobarometer 96, Winter 2021-2022), and as online platforms (such as social media, video-sharing platforms, and search engines) serve as channels for direct, less controlled, and micro-targeted political marketing (Nenadić, 2019), this indicator also examines the regulation and practice of political advertising online.

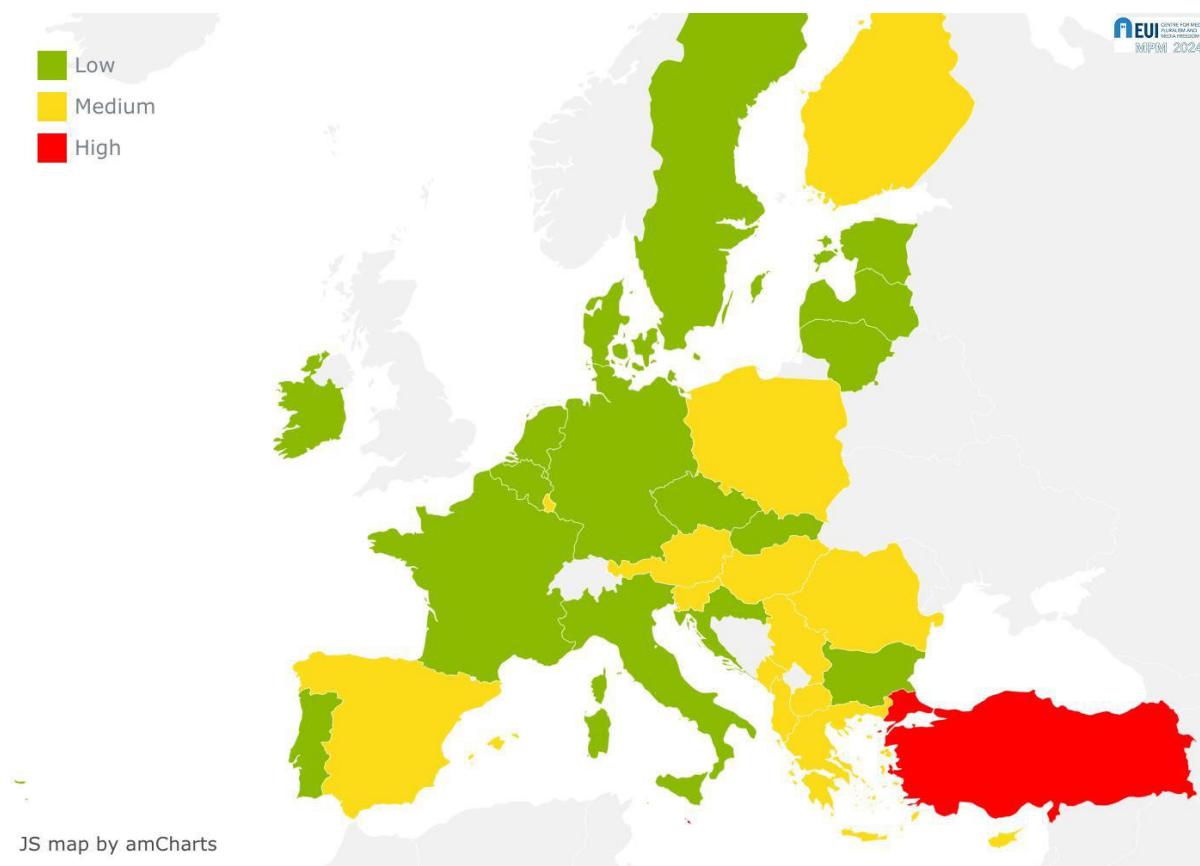
On average, the indicator **Audiovisual media, online platforms and elections** results in the lowest risk score of the five indicators found in this area: low risk (31%), if only EU Member States are considered, and as being at medium-risk (35%) for all the countries, including the EU candidate countries. Across the variety of fields covered under this indicator, the reality behind regulation and actual distribution of political advertising online remains the most concerning one.

As identified by the figure below, Malta and Turkey are once again the only countries in the high-risk band. Notably, Luxembourg, Austria, and Finland moved from the low to medium-risk band, which counts a total of fourteen countries.⁴¹ Vice versa, Italy and Denmark improved from the medium to the low-risk band, which now includes a total of sixteen countries.⁴²

⁴¹ Albania, Austria, Cyprus, Finland, Greece, Hungary, Luxembourg, Montenegro, Poland, the Republic of North Macedonia, Slovenia, Romania, Serbia, and Spain.

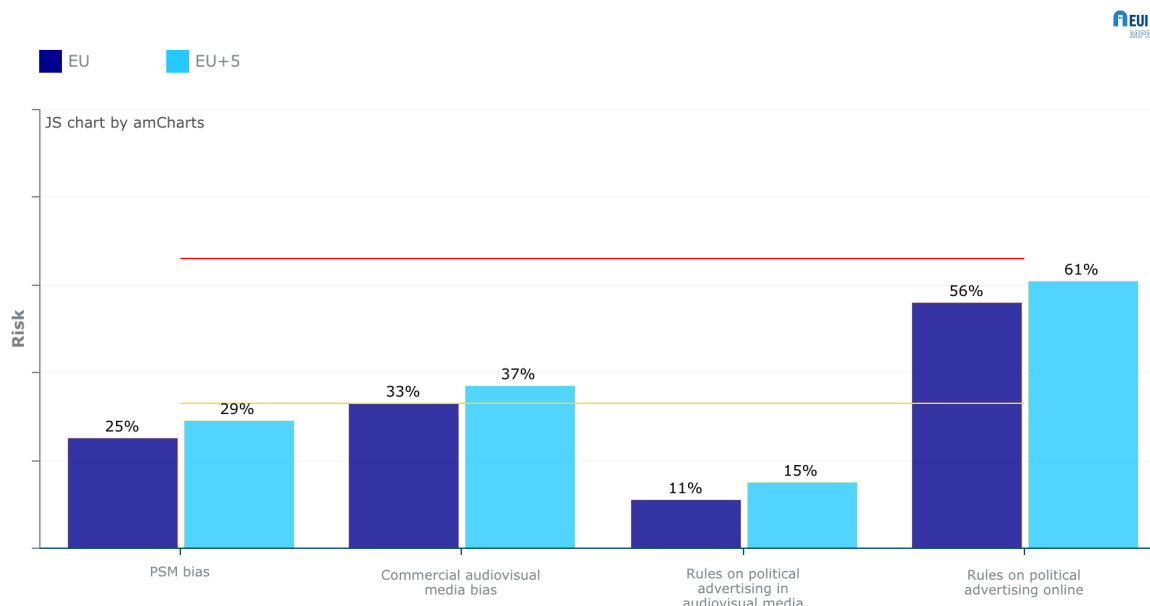
⁴² Belgium, Bulgaria, Croatia, the Czech Republic, Denmark, Estonia, France, Germany, Ireland, Italy, Latvia, Lithuania, the Netherlands, Portugal, Slovakia, and Sweden.

Figure 5.3.a. Indicator on Audiovisual media, online platforms and elections - map of risks per country



The indicator on **Audiovisual media, online platforms and elections** is composed of four sub-indicators, each of them specifically designed to detect risks in both the electoral, and the non-electoral period. As illustrated by Figure 5.3.b., the main driver of risk is identified in the sub-indicator *Rules on political advertising online*, which presents a medium-risk of 61% when considering the EU and candidate countries, and 56% when considering the EU27 only. Compared to the previous assessment, both these values present a slight decrease, by one, and two percentage points, respectively. As shown by the related sub-indicator, the risk related to political advertising is significantly lower in the audiovisual media sphere (15% for the overall aggregate, with a one percentage point decrease). This is due to the strict regulation to which audiovisual media are subjected, especially in the electoral period. The second source of risk within this indicator is represented by *Commercial audiovisual media bias*, which presents a medium-risk score of 37% for the EU plus candidate countries aggregate, and an upper low-risk of 33%, when considering the EU Member States only. Finally, the sub-indicator *PSM bias* scores an upper low risk of 29%, which is a one percentage point increase, compared to the previous year.

Figure 5.3.b. Indicator on Audio visual media, online platforms and elections - averages per sub-indicator



The sub-indicator *PSM bias* assesses the existence and implementation of a regulatory and self-regulatory framework for the access and fair representation of different political actors and viewpoints in PSM, both in the electoral and the non-electoral period. Like the previous year, only three countries are assessed as high risk (Greece, Hungary, and Malta). The overall low-risk picture, at 29%, mainly depends on the general availability of regulation in both the electoral and non-electoral timeframes, which mitigates the risks of unfair representation for most of the countries. At the same time, the analysis below indicates that regulatory safeguards, as well as the monitoring and application by relevant bodies of such provisions, can be impeded and made ineffective by several factors, not least political influences.

Among high-risk scoring countries, Malta and Greece presented increased values this year. Although no elections were held in Malta, the country researcher reported of a 2023 court ruling related to the 2022 campaign period, establishing that the Broadcasting Authority, which is constitutionally obliged to preserve impartiality in public and commercial broadcasting, did not effectively perform its functions in a case of unfair representation of the main opposition party on the public broadcaster (Repeckaite, 2024). In Greece, problems are detected when it comes to the monitoring of the implementation of relevant provisions by the ESR. While the latest parliamentary elections in Greece took place on 21 May and 25 June 2023, the Greek country team reported that no data on the representation of political actors and viewpoints were published until the final version of the MPM country report for Greece, ascribing the problem to ESR’s lack of resources, which, in turn, are also connected to political issues (Papadopoulou & Angelou, 2024).

In Poland, Klimkiewicz (2024) reported high partisanship towards the former ruling party in the audiovisual coverage of the 2023 electoral campaign on TVP. While in Montenegro representation of political actors by RTCG in the 2023 parliamentary, presidential, and municipal elections appeared balanced, local (municipal) PSM, such as Gradska TV, proved highly biased towards its founding parties (Brkić Ružić, 2024). In Serbia, RTS was reported to have been providing more space, and more positive coverage, to representatives of the governments, compared to representatives of the opposition (Milutinović, 2024). According to monitoring reports quoted by Spassov et al. (2024), in Bulgaria, the national public service providers BNT and BNR have offered equal treatment and impartiality in the April early parliamentary elections. However, the team has also reported several matters of concern, among which criticism of representation practices in BNT's informative programmes during the non-electoral period, including the spread of pro-Russian propaganda. In Turkey, the TRT's long-term biased coverage towards the ruling AKP manifested also during the elections held in May 2023 (Inceoglu et al., 2024). In Spain, the country team reported that PSM did not always offer a fair representation of the different groups of political actors. Notably, the national regulatory authority does not provide studies on the matter during elections, meaning that there is a lack of data; some data are nonetheless provided by studies of the Catalan regulatory authority (Suau-Martinez et al., 2024). In Slovakia, concerns over fair representation have diminished since the 2022 appointment of the new director general. Studies quoted by the country researcher did not indicate systemic elements of risk in the context of the September 2023 early parliamentary election (Urbaníková, 2024).

Estonia, Lithuania, Luxembourg, and the Netherlands, also had elections in 2023, with no particular problem to be reported in terms of representation of political actors and viewpoints in PSM. However, for Luxembourg it is interesting to report an observation made by the media regulator—Autorité luxembourgeoise indépendante de l'audiovisuel (ALIA)—with regards to a specific case that occurred in the June 2023 local elections. According to the authority, fair representation is not interpreted in the same way by the national PSM Radio 100.7 and RTL (the major commercial player in the country, which has public service remit). While RTL considers that from the moment a political party competes in more than one municipality it has the right to be represented in the media space, Radio 100.7 takes into account the size and the history of the parties, to give them airtime (ALIA, 2023, as cited in Kies & Lukasik, 2024). As reported by the country team, while ALIA did not share the opinion of Radio 100.7, considering that the principle of fairness is not respected, it could not interfere with the editorial freedom of the PSM (Kies & Lukasik, 2024).

As illustrated above in Figure 5.3.b., the risk related to access and fair representation of different political actors and viewpoints is higher for private audiovisual media, with the sub-indicator *Commercial audiovisual bias* scoring an overall medium-risk of 37%. In Luxembourg, private radio and television channels and municipal channels are not under the supervision of ALIA. Moreover, the country team reports that it is particularly problematic that municipal channels—financed and managed by local administrations, and not adhering to professional standards—are not also supervised by ALIA (Kies & Lukasik, 2024). In Estonia, private broadcasters are not obliged to give political parties airtime. However, if they decide to do so, they need to follow §14 of the Media Services Act (Political balance during active election campaigning) (Palmer & Žuffová, 2024). In Finland, the representation of political actors is unregulated, and when it comes to private audiovisual players, neither self-regulation is available; the PSM Yle, contrarily, has self-regulatory measures (Ylikoski & Ala-Fossi, 2024).

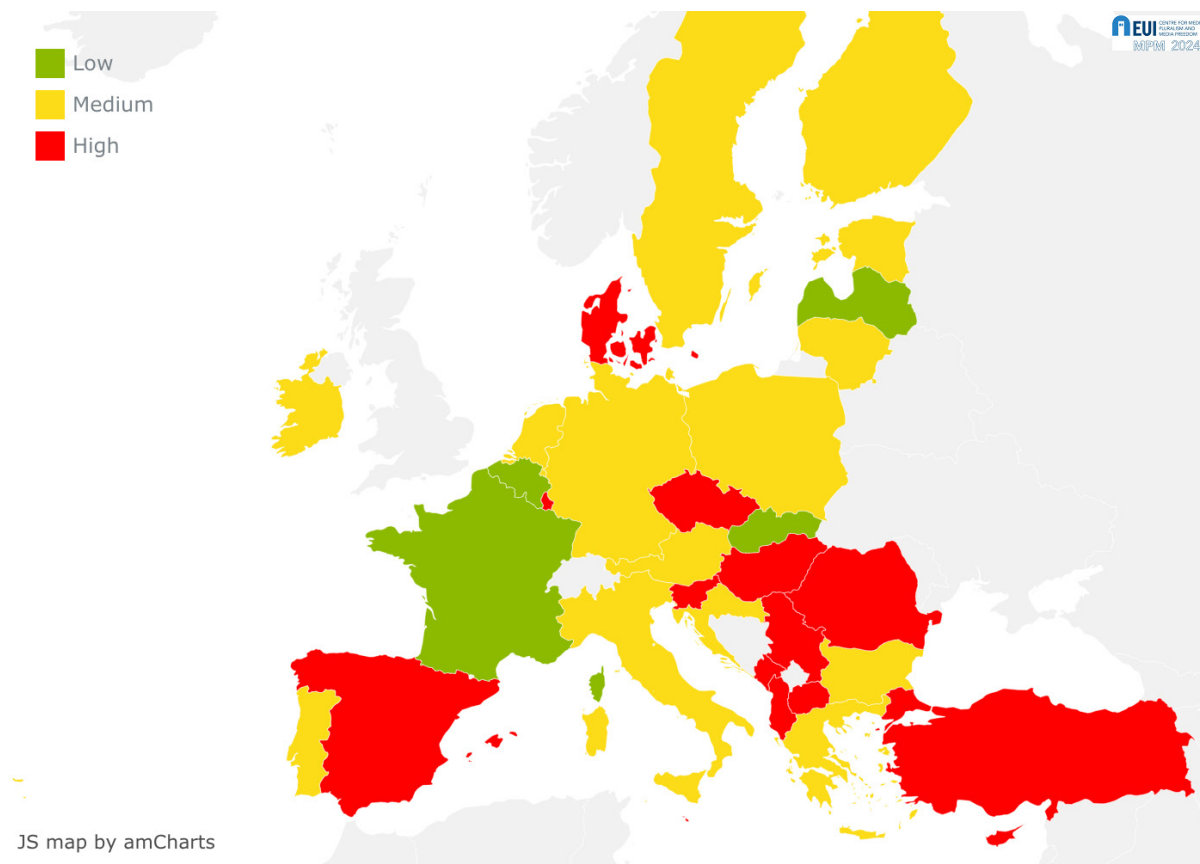
Austria notably jumped to the high-risk band this year. As reported by Seethaler and Beaufort (2024, p. 20), “in the current ‘super election year’ the lack of studies on the role of commercial broadcasters is particularly regrettable”. In Montenegro coverage was not always balanced, as demonstrated by two national TV stations, Prva TV and Adria TV, as well as by E TV (Brkić Ružić, 2024). Similarly, in Lithuania, the representation of different political actors on private channels proved not always fair (Jastramskis & Balčytienė, 2024). On a more positive note, audiovisual coverage of the 2023 electoral campaign was diverse and pluralistic on Polish private channels, while the tone of the coverage depended on the channel (Klimkiewicz, 2024).

As demonstrated by the sub-indicator *Rules on political advertising in audiovisual media* (15%, low-risk), the sale of advertising spaces to political actors during electoral campaigns and referenda poses minimum concerns, in audiovisual media. This largely reflects the general availability of rather strict regulations, across the EU and candidate countries, especially for PSM.

The sub-indicator *Rules on political advertising online* scored the highest risk value under the **Audiovisual media, online platforms and elections** indicator (61%, upper medium-risk), with only four countries in the low-risk band. The rest of the countries are equally distributed between the medium and high-risk bands. The results indicate that the online sphere is largely unregulated, both in terms of equal opportunities, and transparency of political advertising, with relevant consequences in terms of public accountability.

In some countries, the traditional regulations might extend to online news as well. However, they prove largely outdated and, most of the time, they do not address online platforms.

Figure 5.3.c. Sub-indicator on Rules on political advertising online - map of risks for country



Against this picture, the analysis shows that some instruments already exist to increase the transparency and accountability of political advertising on online media and platforms. In fact, political parties and candidates are generally mandated by the Electoral Codes, or laws on financing political subjects, to report on electoral expenses. To varying degrees, such codes and transparency regulations might require that preventive, detailed information on the foreseen expenditure is provided by the given electoral candidate/party, as well as an ex-post breakdown of such expenditure by media type.

Still, such requirements present major deficiencies. For example, in Montenegro, political parties are requested by the Law on financing political subjects and electoral campaigns (38/2020) to report on campaign spending to the Agency for Prevention of Corruption, including the expenditure on internet advertising. As reported by Brkic Ruzic (2024), this broad category includes social platforms and the amounts spent on banners and advertisements on online portals.

However, the monitoring methodology includes only Instagram and Facebook among the platforms analysed. In Albania, where parties and candidates are mandated by the Electoral Code to report all their expenses, independently from the medium used for advertisement, parties have disclosed their ad expenditure only for social media platforms, but not for online media (Likmeta & Voko, 2024). In North Macedonia, no breakdown is requested of the spending in different media and on different social platforms (Micevski & Trpevska, 2024). In Austria, costs for online advertising are reported as a lump sum (Seethaler & Befourt, 2024).

Primarily because of the absence of targeted regulation⁴³, in many countries parties are assessed as highly non-transparent in their expenditure and the techniques used for campaigning (i.e. microtargeting; transformation of common interests pages into political ad accounts right before elections; use of non-official pages connected to political parties), as demonstrated by the specifically dedicated variable under this sub-indicator. Until now, this has been, at least partially, remedied by ad libraries provided by the same online platforms, which allow an estimation of the costs of the online advertising campaign. However, the situation might change in the future, as on 27 February 2024, the European Parliament approved the final text of the Regulation on the Targeting and Transparency of Political Advertising.

5.4 State regulation of resources and support for the media sector

This indicator assesses the legal and practical situation in relation to the distribution of state-managed resources for the media. In a situation in which media organisations face economic difficulties that are caused by the recent economic crises, COVID-19's economic impact, and ongoing technological disruption, financial support from the state can be crucial, especially for non-profit, community media and other less commercial forms of journalism. It is, therefore, of particular importance that fair and transparent rules on the distribution of state resources and support are in place, and that they are being effectively implemented. The lack of clear and transparent rules may be conducive to favouritism and political dependency. The lack of available data on allocation, in practice, is also seen as being a potential risk, since the lack of transparency may conceal the practice of channelling funds to specific media outlets in a biased manner. This indicator also has a specific focus on state advertising, which, following the recent approval of the European Media Freedom Act, will be subjected to specific requirements of fairness and transparency.

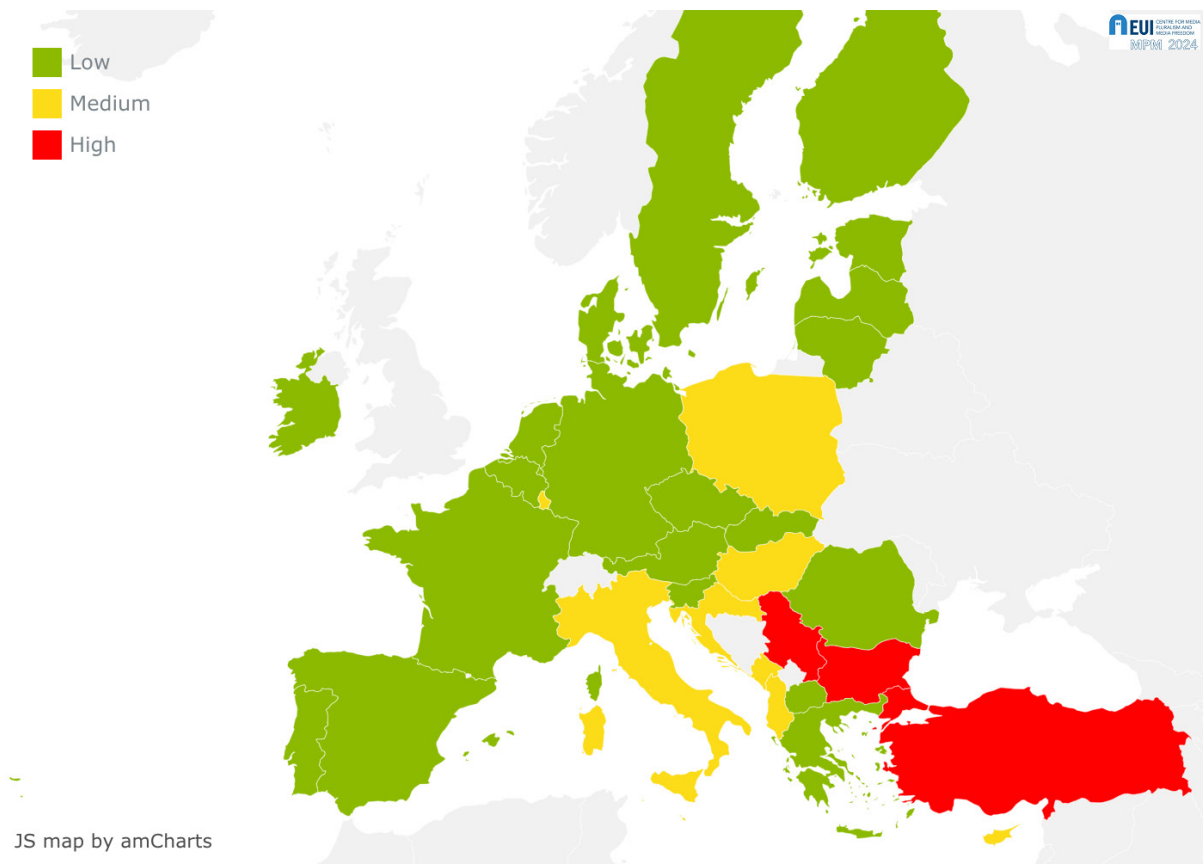
43 The results also show that national Data Protection Authorities are often unable to take sufficient account and monitor the use of personal data on individuals by political parties for electoral campaigning purposes.

The indicator **State regulation of resources and support to the media sector** presents a medium-risk score of 37% this year, the same as the previous assessment. However, when considering the EU Member States only, the indicator was subjected to a one percentage point improvement, which moved the risk from medium to low (33%).

While these results are largely to be considered in line with the previous year's assessment, the analysis of the risk by country reveals several variations. Among the improvements, Austria has moved from the medium to the low-risk band, and Slovenia and Poland from the high to the medium-risk band. Among the negative developments, Montenegro has worsened from the low to the medium-risk, while Bulgaria and Serbia from the medium to the high-risk band. Although this did not affect their risk zone, significant risk variations were detected for Sweden, France, Croatia, Luxembourg (negative) and Greece (positive).

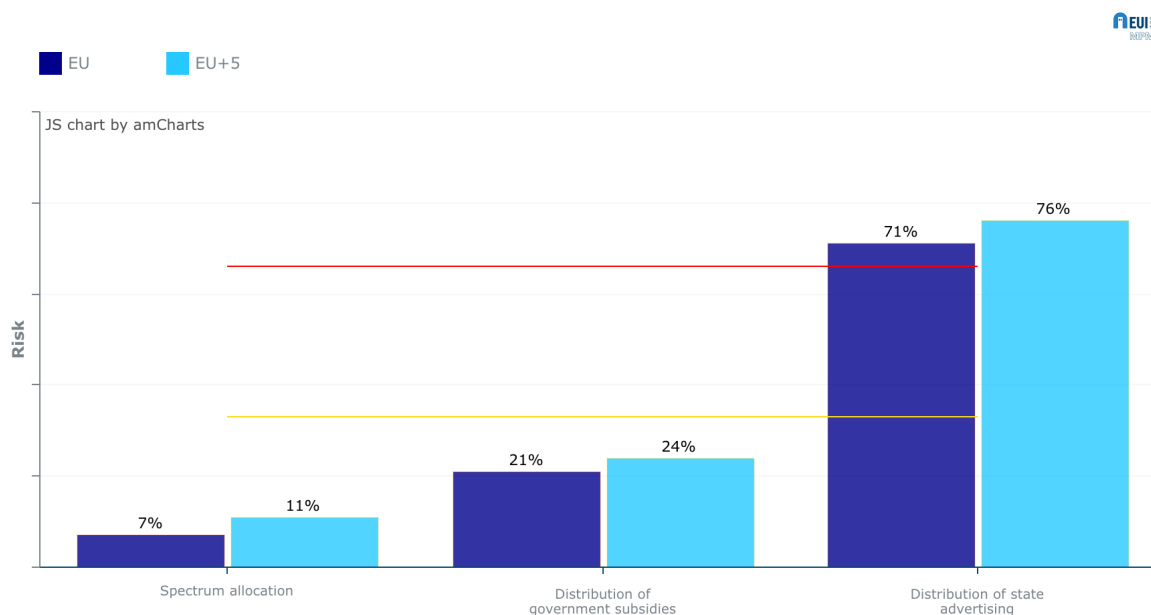
As indicated by the figure below, most of the countries present low-risk scores, while most of the risk is detected in Central and Southeastern Europe. The only countries indicated as being high risk this year are Turkey, Serbia, and Bulgaria. Albania, Cyprus, Croatia, Hungary, Italy, Luxembourg, Malta, Montenegro, and Poland scored medium-risk.

Figure 5.4.a. Indicator on the State regulation of resources and support to the media sector - map of risks per country



The indicator **State regulation of resources and support of the media sector** is composed of three sub-dimensions. The first sub-indicator, *Spectrum allocation*, maintains a low-risk level of 11%, when considering the aggregate of the EU and candidate countries, and a low risk of 7% when considering the EU Member States only. Contrarily, the sub-indicator *Distribution of government subsidies* was subject to a one percentage point risk increase this year, both at the EU 27 and the EU+5 levels. As for the sub-indicator *Distribution of state advertising*, which represents the main driver of risk within this indicator—and for the **Political Independence** area as well—it shows a one percentage point decrease for the EU 27 aggregate (71%), and a one percentage point increase for the overall result (76%).

Figure 5.4.b. Indicator on the State regulation of resources and support to the media sector - averages per sub-indicator



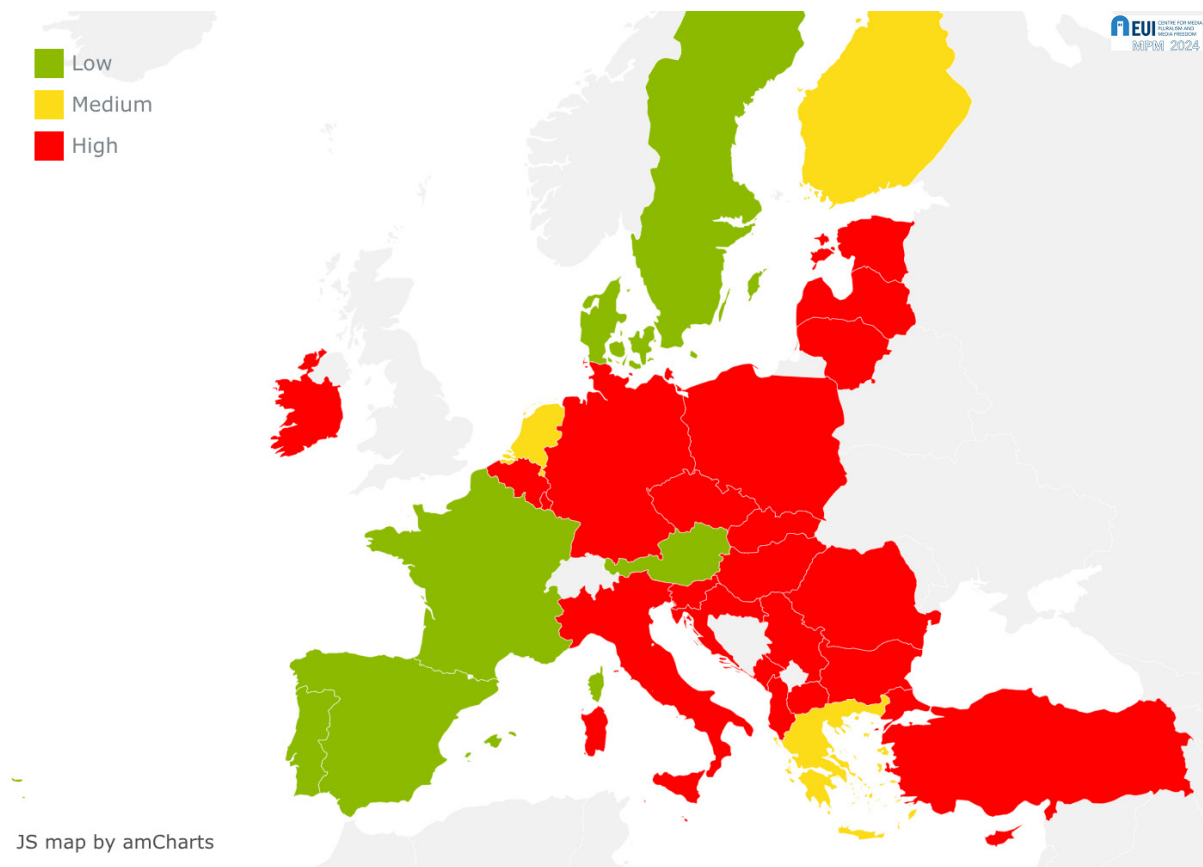
The sub-indicator on *Spectrum allocation* continues to maintain one of the lowest risk scores in the area. It is considered to be a low risk in the vast majority of countries. Within the EU, only Hungary scores a medium-risk level. If candidate countries are included, Serbia is reported as being at medium-risk, while Turkey as being the only country with a high-risk level. These results clearly indicate that most of the countries have introduced a legal framework that respects general regulatory principles and the policy objectives of the Radio Spectrum Policy Programme (RSP 2012) and that the framework is implemented effectively. Among significant variations to be reported this year, Poland had a decreased risk score from the medium to the low-risk level. This was due to a lowered

risk in terms of the implementation of spectrum allocation legislation. As reported by Klimkiewicz (2024), these relatively fair and transparent rules were not implemented effectively in the previous years, with cases of licences being delayed or confirmed at the very last moment. However, throughout the MPM 2024 assessment, such cases decreased. Contrarily, France had an increased risk score, stemming from issues related to the new process of allocations in 2024 for 2025 (Ouakrat & Sklower, 2024).

As introduced above, the sub-indicator *Distribution of government subsidies* was subject to a one percentage point risk increase this year, both at the EU 27 and the EU +5 levels. This is mainly due to the movement of Bulgaria and Serbia from the medium to the high-risk band. At the same time, Poland was subject to a risk decrease, which moved the country to the low-risk band. Like the previous assessment, most of the risks are driven by direct subsidisation, rather than indirect, both in terms of availability/quality of criteria/regulations governing the distribution and actual practice. While the variation in Poland and Bulgaria depended on methodological reconsiderations, the risk deterioration for Serbia was due to increased concerns when it comes to direct contracting and public procurement mechanisms, as well as indirect subsidies. As reported by Milutinović (2024), the rules governing indirect subsidisation were expected to be improved throughout 2023, both in terms of clearness and transparency, but this has not happened. Direct subsidies in the country work through public competition—the so-called project co-financing mechanism—as well as via subventions through direct contracts with the media and other entities to realise so-called media services. These rules lack clarity and present loopholes, according to the country researcher, who also reports political bias, deficiencies in procedures, and insufficient transparency in the allocation, with pro-government media being the biggest beneficiaries.

The third sub-indicator relates to the *Distribution of state advertising*, which persists as being the highest scoring component of this indicator—and of the whole area—with a 76% value. Most of the countries present high risks, with half of them scoring the maximum risk score possible with the MPM (97%). Only three countries are assessed as being at medium-risk (Greece, Finland, and the Netherlands), while only six countries present low-risk results. Compared to the previous MPM round, the EU 27 result has decreased by one percentage point. This was due to the improvement of Austria from the high to the low-risk band, and the improvement of Denmark from the medium-risk to the low one. Slovenia also had a lowered risk score (still in the high-risk band, though). Vice versa, the aggregate including candidate countries was subjected to a one percentage point increase, as Croatia has moved from the medium to the high-risk band. Besides, Luxembourg and Estonia presented even higher risk values than the ones scored for the previous implementation.

Figure 5.4.c. Sub-indicator on Distribution of state advertising - map of risks per country



The analysis of this sub-indicator shows that the risk is equally distributed among the variables assessing the availability and quality of the criteria for the distribution of state advertising, and the one investigating the actual practice of such distribution.

In many countries, there is no specific regulation or criteria. In Croatia, some provisions are in place, but they are not considered sufficient. Bilić and Petričušić (2024: 19-20) reported the case of “the adviser of the now-dismissed minister of Economy and Sustainable Development, who allegedly misused his authority and position to buy political influence through state advertising”. An emergency meeting of the parliamentary committee on informing, informatisation and the media was requested by the parliamentary opposition, in which several proposals were made, including that all state and public bodies and companies be ordered to submit a report within 15 days on advertising, and that the government present within 30 days criteria for the transparent allocation of funds for advertising (Gong, 2023, as cited in Bilić & Petričušić, 2024). However, an agreement was not reached (Bilić & Petričušić, 2024).

The absence of specific rules, or the lack of clarity of the criteria, also has a severe impact in terms of transparency. In Luxembourg, in addition to a lack of clear rules, a dearth of data is reported. Kies and Lukasik (2024) inform that the most recent data available (2014-2021) were given by relevant bodies only after a parliamentary request initiated by a representative of the Pirate party and were referred only to the largest print media. These data, however, showed severe differences in the distribution of state advertising across newspapers, with the total amount being subjected to fluctuations over the years. In Estonia, misuse is not considered an issue, but regulation is not assessed as being able to contribute to transparency, with recipients of state advertising contracts being unknown (Palmer & Žuffová, 2024). Last year, the refusal of authorities to provide data and information on the allocation of state resources to the media caused a very high-risk result for Cyprus. Throughout 2023, the criteria related to the distribution of State advertising were provided to the national country team, but data on the exact allocation were not delivered by the final draft of the Cyprus MPM report. The team reported that information available on the treasury's website is listed only per company, details per title are not always available, and spending below €5,000 is not provided at all (Christophorou & Karides, 2024).

As anticipated, among the improvements this year, are to be signalled the developments in Austria, Denmark, and Slovenia. Austria has seen a much-needed amendment to the Transparency in Media Cooperation and Funding Act. As reported by the country team, “according to this urgently needed amendment all insertions and media cooperations must be reported to the Austrian Regulatory Authority for Broadcasting and Telecommunications (RTR) regardless of the medium's publication frequency and the amount involved” (Seethaler & Beaufort, 2024: 21). While this amendment provided the Act with notable improvements—including the abolition of the *de minimis* limit of €5,000, the expansion of the reporting obligations to social media, poster advertising, and cinema advertising, the preparation of a transparency report and impact analysis for every campaign with a budget volume of more than €150,000, requirements related to publications, as well as penalties—a cap was not foreseen for the placement of the ad. Hence, according to the country team, “it remains to be seen whether greater transparency will go hand in hand with greater fairness” (Seethaler & Beaufort, 2024, p. 21).

In Slovenia, the risk also decreased because of a new text, namely the Recommendations for the implementation of advertising campaigns of ministries, bodies within ministries and government services. The text, adopted by the government in December 2023, fostered the publication by the authorities of annual reports of implemented advertising campaigns in 2023 (Milosavljević & Biljak Gerjevič, 2024). As for Denmark, the risk decrease was due to the reconsidered availability of legal safeguards (Ylikoski & Ala-Fossi, 2024).

5.5 Independence of public service media

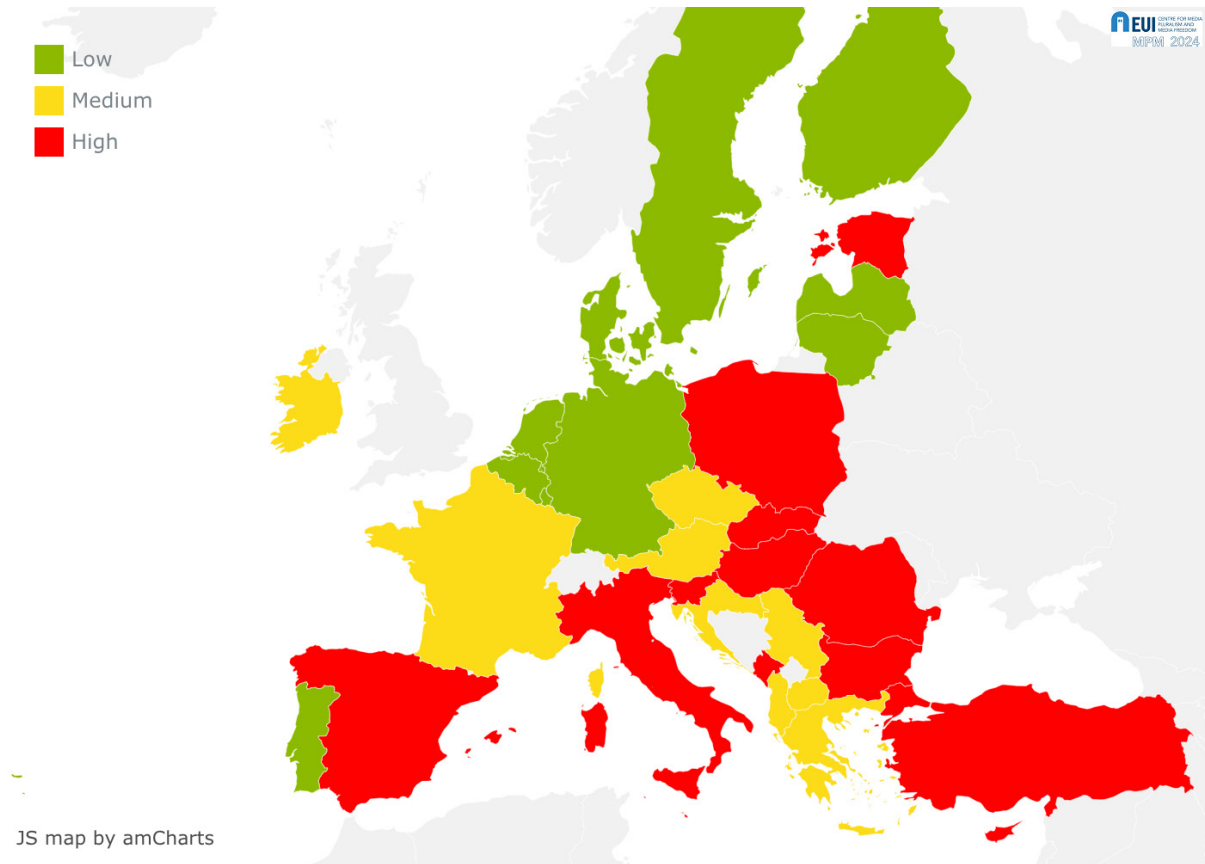
The Independence of the public service media (PSM) indicator is designed to measure the risks that stem from appointment procedures for top management positions in the public service media, and the risks arising from the PSM funding mechanisms and procedures. The reasons behind giving a special focus to the PSM are twofold; they emerge from its perceived special role in society, and its relationship to the state (CMPF, 2016). PSM systems are usually established by the state, which, in some cases, still maintains an influence over them. Given that the PSM are thought of as being those media that are both owned by the public and responsible to it, and that are characterised by nationwide access, and that have to produce content for all communities (Smith, 2012), it is feared that the PSM that are under political influence will no longer fulfil the above-mentioned roles. Specifically, it is feared that they will produce biased content and reduce the ability of citizens to make informed choices. To secure their independence, it has frequently been suggested that the state should have only a minimal ability to interfere with the procedures for appointments to their boards and to exert influence by using funding (Benson & Powers, 2011; Council of Europe, 2012; Hanretty, 2009; Papatheodorou & Machin, 2003). The recently approved European Media Freedom Act enshrined specific safeguards, in these terms, that will require Member States to set up fair and transparent procedures in terms of appointments and dismissals of the PSM top management, as well as funding procedures aimed at guaranteeing adequate, sustainable, and predictable financial resources.

The indicator **Independence of public service media** presents an overall 53% risk score, in the medium-risk band. When considering the EU 27 result, the risk is 49%. Compared to the previous year, this represents a one percentage point increase for the overall aggregate, while at the EU level the risk is unchanged.

While also in this case the results are largely considered in line with the previous MPM round, several variations of risk are detected, if looking at the results per country. Among the improvements, the Czech Republic and Serbia moved from the high to the medium-risk level. Vice versa, Estonia has moved from the low to the high-risk band. The analysis detected significant risk variation in other countries as well. Although this did not affect their positioning across the three risk bands, it contributed to the overall risk increase of the indicator.

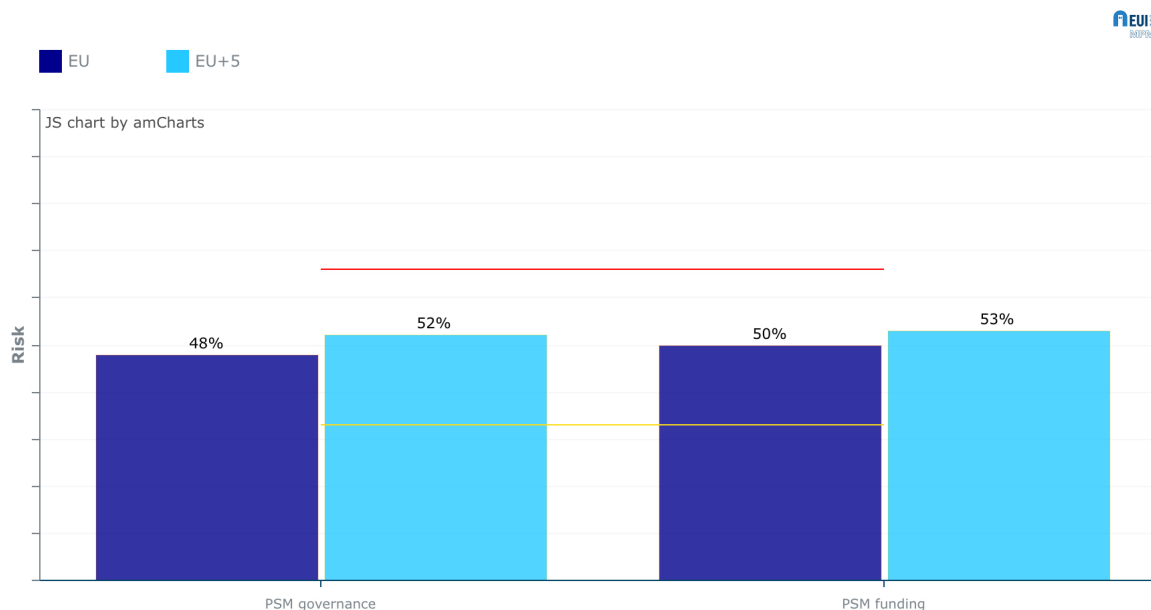
Ten countries are assessed as being at low risk (Belgium, Denmark, Finland, Germany, Latvia, Lithuania, Luxembourg, the Netherlands, Portugal, and Sweden). Nine countries fall within the medium-risk band (Albania, Austria, Croatia, the Czech Republic, France, Greece, Ireland, the Republic of North Macedonia, and Serbia). Thirteen score high-risk values (Bulgaria, Cyprus, Hungary, Estonia, Italy, Malta, Montenegro, Poland, Romania, Slovakia, Slovenia, Spain, and Turkey).

Figure 5.5.a. Indicator on the Independence of public service media - map of risks per country



The indicator **Independence of public service media** is composed of two sub-dimensions. The first sub-indicator, *PSM governance*, shows a one percentage point decrease, when considering the EU 27 aggregate (48%), and a one percentage point increase when considering the overall result (52%). The other sub-indicator, *PSM funding*, shows a one percentage point increase for the EU aggregate (50%), remaining unchanged for the overall aggregate score (53%).

Figure 5.5.b. Indicator on the Independence of public service media governance and funding - averages per sub-indicator



The sub-indicator *PSM governance* sheds light on the grip that political parties continue to exercise through a wide range of procedures. More specifically, the analysis investigates the availability, quality, and effective implementation of the appointing and dismissal procedures for the top management of PSM (PSM councils, foundations, boards of directors), including the director general and/or the chief executive officers (which in some countries, such as Italy, can be two separate professional figures within the PSM structure). These criteria can be met, for instance, by applying merit-based procedures, as well as by the setting up of performance criteria that are to be evaluated in the dismissal procedure. Furthermore, starting from the MPM 2023 implementation, the sub-indicator *PSM governance* was revised to include the analysis of the independence of the PSM’s editorial line from a government, or from any other form of political influence.

Similar to the previous MPM round, almost half of the countries assessed present high-risk results under the sub-indicator *PSM governance*, which scores an overall result of 52%. In aggregate terms, the risk has increased specifically due to heightened concerns when considering the legal procedures for appointments and dismissals, as well as the independence of the PSM editorial line from political influence. Once again, the analysis locates most of the concerns in the Central and Southeastern European region.

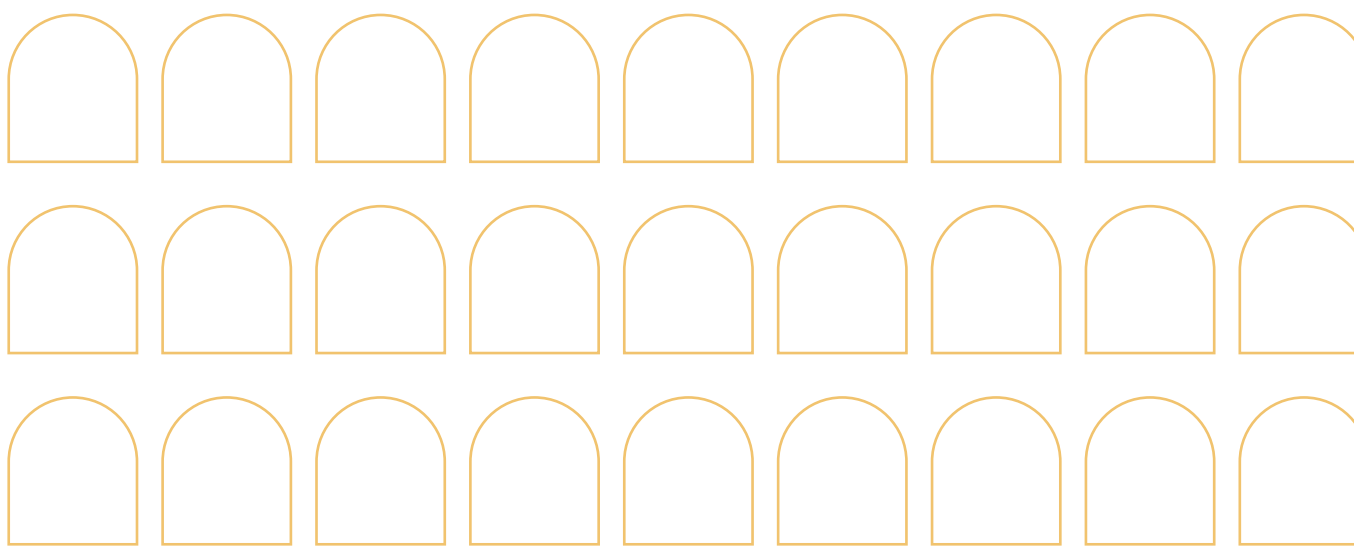
As reported by Klimkiewicz (2024), in Poland the dismissal of the former management of TVP, Polish Radio and the Polish Press Agency—which since 2016 were subjected to a harsh political grasp by the former ruling party PiS—generated a highly controversial situation. The procedure, which was guided by commercial law and concluded with the appointment of new nominees, was vetoed by President Duda in December 2023 through the budget-related act for 2024 (worth PLN 3 billion earmarked for PSM), who cited the violation of the Constitution. As the funds were withdrawn, the PSM was dissolved by Sienkiewicz some days after, aiming to restructure (Lepiarz, 2023, as cited in Klimkiewicz, 2024). Apart from the uproar from the former governing PiS, the direct appointment from the government raised concerns from several others, including the Helsinki Foundation for Human Rights. A draft for a media reform is being discussed (Klimkiewicz, 2024).

In Slovakia, political pressure on RTVS peaked after the September 2023 elections, with harsh attacks coming from the representatives of the new government. Notably, in 2023 a proposal for the split of RTV into separate television and radio entities emerged, something that would allow the removal of the current director general, and replacement with a government candidate. The plan was finally withdrawn, but alternative solutions are reported to be being explored (Urbaníková, 2024). In Italy, the attempt of the governing majority to replace the CEO was in the end successful. As reported by the Italian country team, “to persuade him to resign, the government offered him the prestigious position of superintendent of the Teatro San Carlo in Naples (Carboni, 2023, as cited in Vigevani et al., 2023: 33). To free up that position, occupied by Stephane Lissner, the government issued a decree-law (no. 51/2023) introducing an age limit to prematurely terminate Lissner's term (the provision is currently under review by the Italian Constitutional Court). Following Fuortes' resignation, a new CEO, Roberto Sergio, was appointed, along with a series of other top-level figures and news editors, including the new directors of Tg1 and Tg2” (Vigevani et al., 2024, p. 33).

Austria also presents severe concerns, being in the upper medium-risk band, the same as the previous year. However, in October 2023, the Constitutional Court annulled several of the provisions on the composition and appointment of the Audience and Foundation Councils, respectively, which were considered as “a major gateway for political influence on PSB management, as unconstitutional, as they violate the requirement of independence and pluralistic composition of these bodies enshrined in art. 1 para 2 of the Federal Constitutional Act on Guaranteeing the Independence of Broadcasting” (Seethaler & Beaufort, 2024, p. 22).

As for the sub-indicator *PSM funding*, it “remained stable with a value of 53%”. Only eight countries are at a low risk, with the rest being distributed between the medium and the high-risk band, fourteen score as being at medium-risk, and ten as being at high risk. Compared to the previous year, Estonia has moved from the low to the high-risk zone. The researchers reported that funding is dependent on political decisions, with no public consultation. Concerns were also detected when it comes to risks of competition distortion of the PSM online mission (Palmer & Žuffová, 2024). While remaining in the medium-risk zone, Ireland has notably jumped close to the high-risk threshold. Following a mass refusal to renew the licence fee payments due to the perception that RTE had been less transparent on its finances, the Department of Media had to provide additional funding to avoid bankruptcy (Flynn, 2024). Additional funding was announced by the government also in Slovenia, where the PSM was “on the verge of liquidity” (Milosavljević & Biljak Gerjevič, 2024: 18). A call to the authorities arrived from TV Slovenija’s editors to find a long-term, systemic solution (STA, 2023, as cited in Milosavljević & Biljak Gerjevič, 2024). In Montenegro, the attempt by the government to change legal provisions “by making the funding dependent on macroeconomic parameters and consumption limits, provoked the intervention of the EU representative, after which the amendment was changed to the fixed amount of 1.34% of the current state budget” (Brkić Ružić, 2024, p.21).

Vice versa, the Republic of North Macedonia has improved from the high to the medium-risk band, because “legislative improvements instated in July 2023 made the funding of PSM more adequate than previously” (Micevski & Trpevska, 2024: 20). Luxembourg also had a decreased value, from the medium to the low, as in 2023 a pluriannual convention was signed that will ensure sufficient incomes up to 2030 (Kies & Lukasik, 2024).



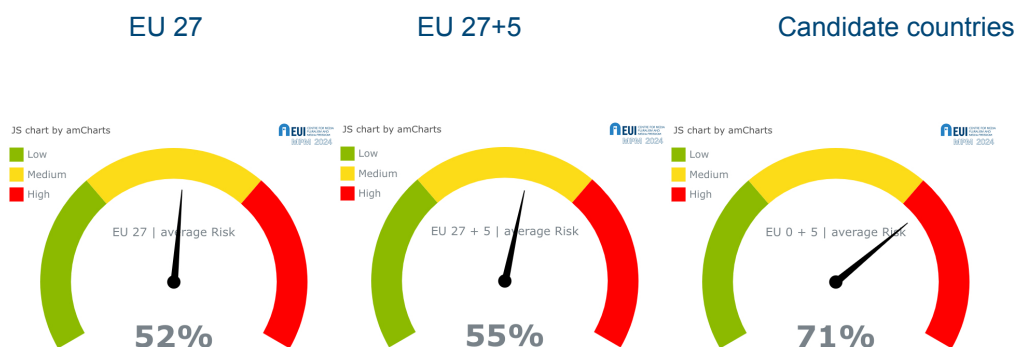
6. SOCIAL INCLUSIVENESS

Social Inclusiveness is a key aspect of a participatory media system and is a core element of media pluralism. This area therefore examines the representation in the media, both in terms of media production and media content, of diverse groups, including cultural, ethnic, and linguistic minorities, local and regional communities, and women. It also takes into account the accessibility to quality news content for groups with special needs, such as people with disabilities. Media literacy, as a precondition for using the media effectively, is also included in the Social Inclusiveness area, as well as the fight against disinformation and hate speech, in order to ensure that there is a safe media space for everybody.

The Social Inclusiveness area covers the following indicators:

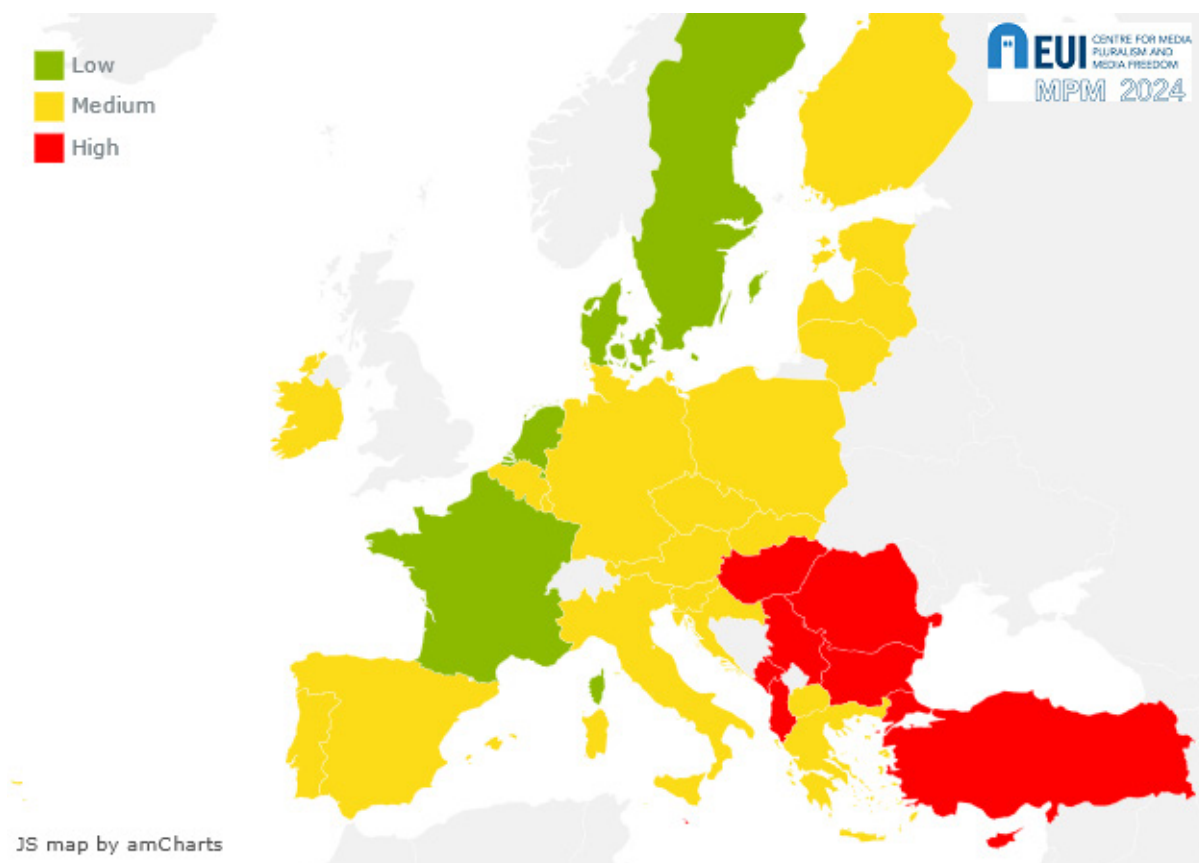
- *Representation of minorities in the media*
- *Local, regional and community media*
- *Gender equality in the media*
- *Media literacy*
- *Protection against disinformation and hate speech*

Figure 6.a. Social Inclusiveness area - risk gauges



The **Social Inclusiveness** area is the second most problematic area studied after **Market Plurality**. Its average risk remains in the medium-risk band, at 55%, when taking into account and candidate countries (see Figure 6.a.). This score shows a minor increase of 1 percentage point compared with the two previous editions of the MPM. When taking into account EU Member States only, the risk level decreases to 52%, still in the medium-risk band, while when taking only candidate countries, the risk level increases to 71% and shifts to the high-risk band.

Figure 6.b. Social Inclusiveness area - map of risks per country



Of the 32 countries studied in this edition:

- Five countries score in the low-risk band: Denmark, France, Lithuania, the Netherlands, and Sweden. All these countries, except Lithuania, traditionally perform well in terms of Social Inclusiveness. Lithuania, however, scores in the low-risk band for the first time.

- 18 countries score in the medium-risk band (Austria, Belgium, Croatia, the Czech Republic, Estonia, Finland, Germany, Greece, Ireland, Italy, Latvia, Luxembourg, the Republic of North Macedonia, Poland, Portugal, Slovakia, Spain, and Slovenia). The medium-risk band reflects some very diverse situations. While Finland and Germany score in the lowest fringe of the medium-risk band, six countries have scores very close to the high-risk band.
- Nine countries are associated with a high risk: Albania, Bulgaria, Cyprus, Hungary, Malta, Montenegro, Romania, Serbia, and Turkey. Albania and Hungary confirmed their high-risk scores from the previous editions. Several countries have been oscillating between the medium-risk and the high-risk bands over the past implementations of the MPM, namely Cyprus, Greece, Malta, and Serbia. Such variation is due to the existence of both engrained issues and precise efforts to target them.

The geographical division of countries shows that:

- Except for the Republic of North Macedonia, all the candidate countries score within the high-risk band. Efforts in terms of Social Inclusiveness are still minimal in most of the candidate countries. The relatively good performance of the Republic of North Macedonia is linked to the satisfactory representation of legally recognised minorities in the Public Service Media (PSM), as well as to the increasing presence of women in management positions, both in public service and in private media companies (Micevski & Trpevska, 2024)
- The risk associated with Social Inclusiveness has steadily decreased in two countries: Lithuania, which now scores within the low-risk band, and Finland, in the lower fringe of the medium-risk band. In the past years, Lithuanian media companies have made some visible efforts to increase programmes dedicated to ethnic and linguistic groups. Efforts have also been made in the field of media literacy to include up-to-date and comprehensive activities in the compulsory curriculum (Jastramskis & Balcytiene, 2024). In Finland, the risk level is still important in terms of local and community media (Ylikoski & Ala-Fossi, 2024).
- In Hungary, the high risk linked to Social Inclusiveness has steadily increased over the years. This is due to “the weaknesses and lack of independence of local and community media, the failing gender balance of PSM and private media, the lack of a functioning media literacy strategy, as well as insufficient measures to tackle disinformation and hate speech – in the latter two cases also taking into consideration that the government itself is fuelling the spread of disinformation and hate speech with its public messaging” (Bleyer-Simon et al., 2024).

- While Slovakia remains in the medium-risk band, the risk level associated with Social Inclusiveness increased by 11 percentage points compared to last year (the highest increase for a country in this area). This is mainly due to the increased risk associated with the spread of disinformation. According to Urbaníková (2024), “this shift was mainly due to the widespread prevalence of disinformation in Slovakia (GLOBSEC, 2023), coupled with hindered state efforts to tackle it. Following the early parliamentary elections in September 2023, the new government implemented extensive staff changes in specialised units dealing with strategic communication at several ministries and the Government Office of the Slovak Republic. This has introduced instability into the strategic communication environment, raising questions about the new government’s commitment to supporting this portfolio (Prague Security Studies Institute, 2023).”
- Germany has shifted from the low-risk band to the medium-risk band with a score of 38%. There is a high risk associated with Gender equality in the media, and more specifically with the poor representation of women in management positions in PSM at the local level (Kalbhenn, 2024).
- Greece has shifted from the high band to the medium-risk band as some efforts were made in terms of media literacy and the fight against disinformation (Papadopoulou & Angelou, 2024). However, whether or not this shift is lasting will have to be confirmed in the coming years.

Figure 6.c. Social Inclusiveness area - averages per indicator

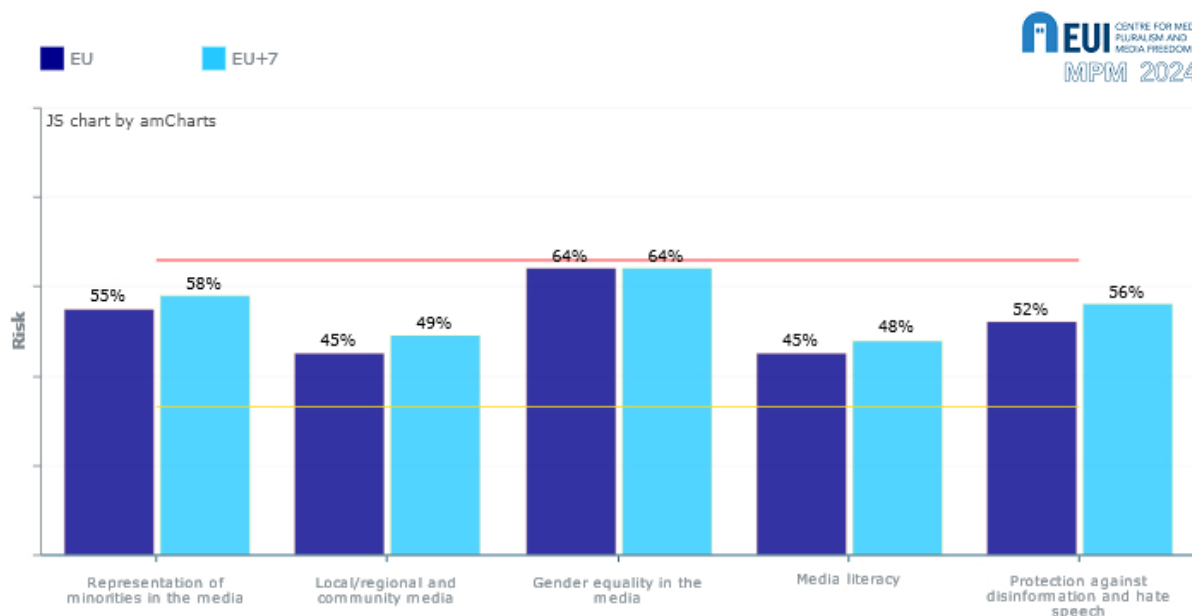


Figure 6.b. shows that all the indicators in the **Social Inclusiveness** area are associated with a medium-risk. Among them, the most problematic indicator remains Gender equality in the media, with a risk level estimated at 63% for EU Member States (+1pp compared to MPM2023) and 64% for all countries. This is in line with the findings of the previous editions of the MPM. This indicator remains the fourth highest scoring indicator, after three indicators of the **Market Plurality** area: Plurality in digital markets (82%), Plurality of media providers (80%), and Editorial independence from commercial and owners' influence (69%). The observation is similar to last year: women are still under-represented in management positions. Moreover, even if their number increases in news production, this is not necessarily a sign of a fairer representation in news content.

The indicator **Local, regional and community media** presents the highest increase with 45%, compared to 41% last year for EU Member States, and 49% compared to 44% for all the countries studied. Such results do not confirm the positive trend observed in the two previous editions of the MPM. The addition of a variable on news deserts (see Annexe 1), which was associated with an average risk of 66%, has contributed to the increased risk for the indicator.

The indicator **Representation of minorities in the media** also increased to 55%, compared to 52% last year for EU Member States, and 58% compared to 54% for all the countries studied. This increase is linked to the addition of a new variable on the existence of diversity charters to promote the representation of marginalised communities in PSM (See Annexe 1). To an extent, this overshadows some improvements concerning the representation of legally recognised minorities in commercial media.

Protection against disinformation and hate speech remains stable with 52% for EU Member States, and 56% with candidate countries combined. This reflects that in most countries protection against disinformation remains underdeveloped. There are a lot of individual initiatives, yet most countries do not have a comprehensive and long-term strategy to fight disinformation.

Finally, the risk associated with **Media literacy** remains stable, with 52% for EU Member States, and a combined score of 56% for EU Member States and candidate countries. The problems in this area are similar to the ones observed in the area of disinformation. In most countries, some individual and limited media literacy initiatives are conducted in the absence of a comprehensive policy framework.

6.1 Representation of minorities in the media

This indicator focuses on the representation of minorities (whether legally recognised or not) on the PSM and private TV and radio. It takes into account both the existing legal safeguards and the representation of minorities in practice. Variables have been elaborated based on documents of the Council of Europe (CoE) and the Organisation for Security and Co-operation in Europe (OSCE). The OSCE's Oslo Recommendations (p.6) state: "Persons belonging to national minorities should have access to broadcast time in their own language on publicly funded media. At national, regional and local levels, the amount and quality of time allocated to broadcasting in the language of a given minority should be commensurate with the numerical size and concentration of the national minority and be appropriate to its situation and needs."⁴⁴ The Council of Europe's European Charter for Regional or Minority Languages⁴⁵ (Article 11) and its Framework Convention for the Protection of National Minorities⁴⁶ emphasise that the Convention Parties shall ensure, within the framework of their legal systems, that persons belonging to a national minority are not discriminated against, but are facilitated in their access to the media (Article 9).

For the MPM, a "minority" is defined as being a cultural or social group that fulfils all the following criteria:

- *its number is below that of the rest of the population of a state,*
- *it is smaller than the majority group in the respective country,*
- *it is in a non-dominant position,*
- *its members possess ethnic, religious, or linguistic characteristics differing from those of the rest of the population.*

This indicator also assesses media accessibility for people with disabilities. It takes into account the existing regulatory framework to guarantee media accessibility as well as the existence of support services for people with hearing and visual impairments in practice. All citizens have the right to access media, and persons with disabilities need this access to live independently and to participate fully in all aspects of life. The UN Convention on the Rights of Persons with Disabilities⁴⁷, which has been ratified by all the EU countries, stresses that states should encourage the media, including the providers of information through the internet, to make their services accessible to persons with disabilities and that they should promote the use of sign language (Article 21). The Conven-

44 <https://www.osce.org/files/f/documents/8/1/67531.pdf>

45 <https://rm.coe.int/1680695175>

46 <https://rm.coe.int/16800c10cf>

47 <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities.2-html>

tion also asserts that states shall take all appropriate measures to ensure that persons with disabilities enjoy access to television programmes in accessible formats (Article 30). At the European level, the Audiovisual Media Services Directive (Article 22)⁴⁸ states that “Member States should, without undue delay, ensure that media service providers under their jurisdiction actively seek to make content accessible to persons with disabilities and, in particular, those with a visual or hearing impairment. Accessibility requirements should be met through a progressive and continuous process, while taking into account the practical and unavoidable constraints that could prevent full accessibility, such as programmes or events broadcast in real time”. The Directive further contains a requirement to measure progress, based on the regular reports provided by media service providers. The access to audio-visual media has been defined in Paragraph 31 of Directive 2019/882, on the accessibility requirements for products and services⁴⁹, as follows:

“... audio-visual content is accessible, as well as mechanisms that allow users with disabilities to use their assistive technologies. Services providing access to audio-visual media services could include websites, online applications, set-top box-based applications, downloadable applications, mobile device-based services including mobile applications and related media players as well as connected television services”.

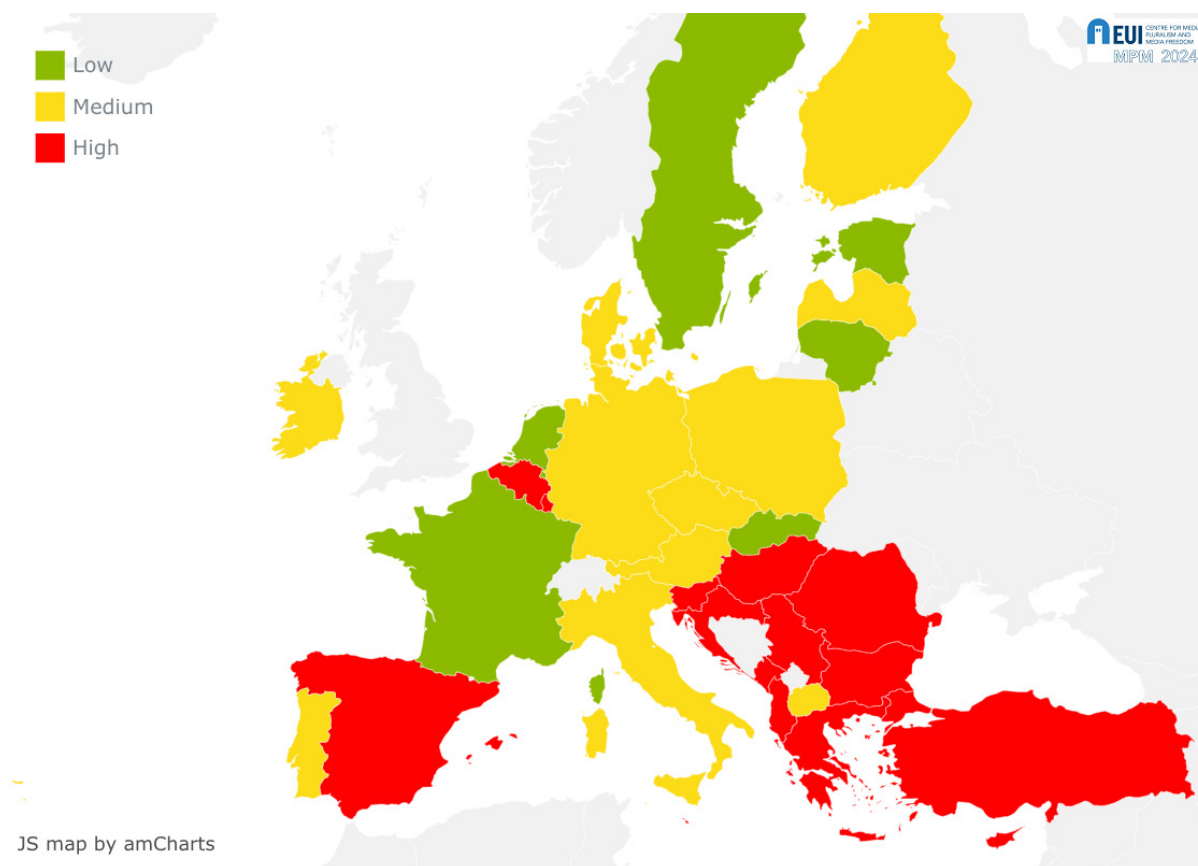
Within the framework of the MPM, people with disabilities are defined as those who are blind, partially sighted, deaf or hard of hearing.

The risk associated with the **Representation of minorities in the media** has increased to 55% for EU Member States (+3pp) and 58% for all the countries studied (+4pp). Fifteen countries are considered to be at high risk (Albania, Belgium, Bulgaria, Cyprus, Croatia, Greece, Hungary, Luxembourg, Malta, Montenegro, Romania, Serbia, Slovenia, Spain, and Turkey). Amongst them, six countries scored within the medium-risk band last year: Belgium, Cyprus, Hungary, Montenegro, Serbia, and Slovenia. Eleven countries scored in the medium-risk band: Austria, the Czech Republic, Denmark, Finland, Germany, Ireland, Italy, Latvia, Portugal, Poland, and the Republic of North Macedonia. Six countries obtained a low-risk score (Estonia, France, Lithuania, the Netherlands, Slovakia, and Sweden).

48 <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>

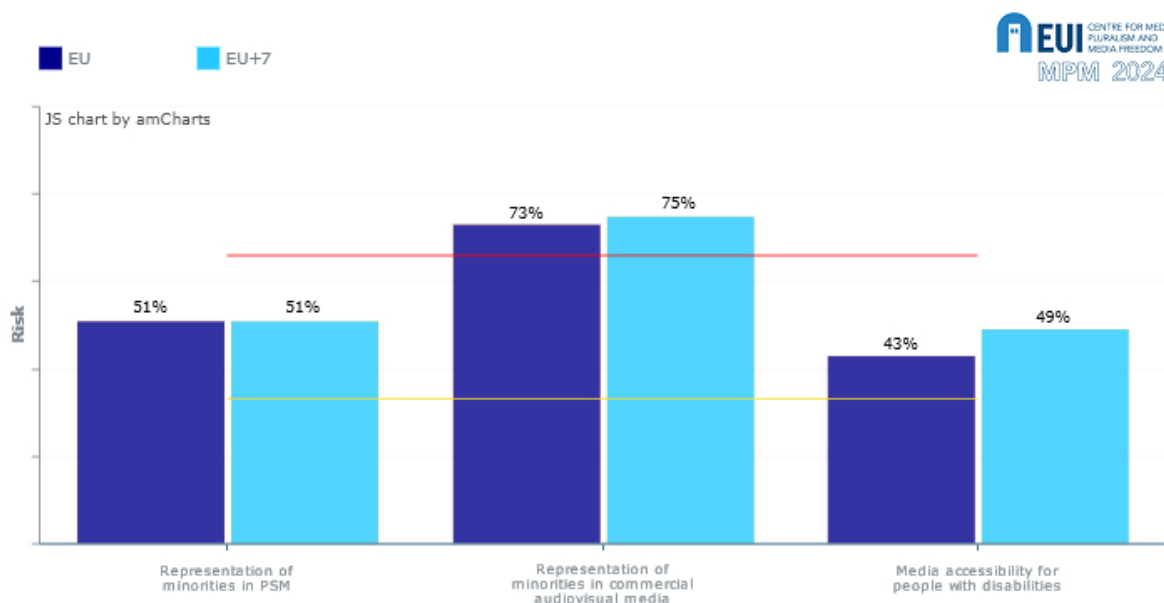
49 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0882>

Figure 6.1.a. Indicator on the Representation of minorities in the media - map of risks per country



The augmentation of the average risk level for the indicator **Representation of minorities in the media** is linked to the sub-indicators on *Representation of minorities in PSM* and *Representation of minorities in commercial audiovisual media*. The **Representation of minorities** in PSM has increased to 51% for both EU Member States alone, and EU Member States plus candidate countries; that is respectively +7pp for EU Member States and +10pp for all countries studied. The *Representation of minorities in commercial audiovisual media* is now in the high-risk band with 73% for EU Member States (+4pp) and 75% for EU Member States plus candidate countries (+5pp). The sub-indicator on *Media accessibility for people with disabilities* has remained stable this year, after a strong increase last year due to the revision of the risk level thresholds, in line with the AVMSD 2018/1808.

Figure 6.1.b. Indicator on the Representation of minorities in the media - averages per sub-indicators



Representation of minorities in PSM

The *Representation of minorities in PSM* is less problematic than in commercial media. However, it is assessed as low risk in only eleven countries: Austria, the Czech Republic, Estonia, France, Finland, Italy, Lithuania, Montenegro, the Netherlands, Slovakia, and Sweden. The main characteristics observed are the following:

- When existing, the access to broadcast time for legally-recognised minorities is legally guaranteed in most countries. The only countries making exceptions are Denmark, Greece, and Turkey. The absence of legal safeguards does not mean however that these minorities are deprived of access to airtime in practice.
- The access to broadcast time for non-legally recognised minorities is more problematic. Their access to broadcast time on public service media is assessed as low risk in only two countries: Denmark and the Netherlands. In the Netherlands, the broadcasting association Omroep Zwart has displayed efforts to provide sufficient media access to minorities since 2021. The Dutch Foundation for Public Broadcasting (NPO) is also working on ethnic diversity in their programmes and has been monitoring the efforts since 2022 (de Swert et al., 2022).
- The PSM does provide national news in minority languages in most countries. However, this does not necessarily cover all the linguistic minorities.
- Half of the countries have at least adopted some forms of diversity charters to increase the visibility of marginalised communities in the media. One of the most am-

bitious diversity charters in the studied countries is the Finnish public service media group Yle's Equality and non-discrimination plan. This plan includes both diversity among staff and in programming. Since 2021, a Development Manager for News and Current Affairs supervises the application of the equality strategy and has developed guidelines and learning materials over the years. Besides, the outcome of such charts has been monitored since 2016 (Ylikoski & Ala-Fossi, 2024).

Representation of minorities in commercial media

The *Representation of minorities in commercial media* is assessed as low risk in only two countries: Estonia and Slovakia. The majority of the countries, 19 in total, are assessed within the high-risk band. The main observations regarding the representation of minorities in commercial media are the following:

- The average risk associated with the representation of legally recognised minorities in commercial media is assessed as high risk. In most countries, private TV companies do not offer any coverage for legally recognised minorities.
- The exception may be if the minority is large enough and if there is a political will behind that choice. This is the case in Estonia. Here, the Russian minority has access to seven Russian-speaking private radio channels, numerous information portals with a Russian edition, as well as regional and local newspapers. The two main newspapers, Delfi and Postimees have a special edition in Russian. The Ministry of Culture has allocated one million euros of subsidies to private Russian-language media in Estonia in 2023, in order to promote access to quality news for the Russian-speaking minority (Palmer & Žuffova, 2024).
- The risk associated with non-legally recognised minorities in private commercial media is even higher than for legally recognised minorities.

Media accessibility for people with disabilities

The risk associated with *Media accessibility for people with disabilities* is assessed as medium, with 44% for EU Member States and 49% for all the countries studied. This result is almost stable compared to last year. The main trends compared to last year haven't changed:

- In most of the EU Member States, there is a developed policy framework to ensure media accessibility for people with disabilities. There is room for improvement in 14 countries, scoring in the medium-risk band.
- The transposition of the AVMSD has strengthened the existing legal framework regarding media accessibility. For example, in Slovakia, as mentioned in Urbaniková

(2024): “the new Act No. 264/2022 Coll., on Media Services, adopted in 2022, significantly increased the requirements for broadcasters in terms of the proportion of programmes that must be accompanied by voice-overs for persons with visual impairments, and the proportion of programmes with subtitles or sign language for persons with hearing impairments (transitional provisions apply; the proportions of programmes should reach the level set by the Act in 2027)”. This is also the case in Estonia, where the Consumer Protection and Technical Regulatory Authority (TTJA) will impose sanctions if the quotas are not respected, beginning in 2025.

- Efforts regarding media accessibility for people with hearing impairment are considered more impactful than those for blind people. While the risk linked to media accessibility for people with hearing disabilities is assessed at 44%, the risk is assessed at 62% for blind people.
- New AI technologies in some cases have permitted some visible improvement in terms of media accessibility. For example, in Estonia, the public service channels ETV and ETV2 have implemented some AI-generated automatic subtitles since autumn 2023 (Palmer & Žuffová, 2024).

6.2 Local, regional and community media

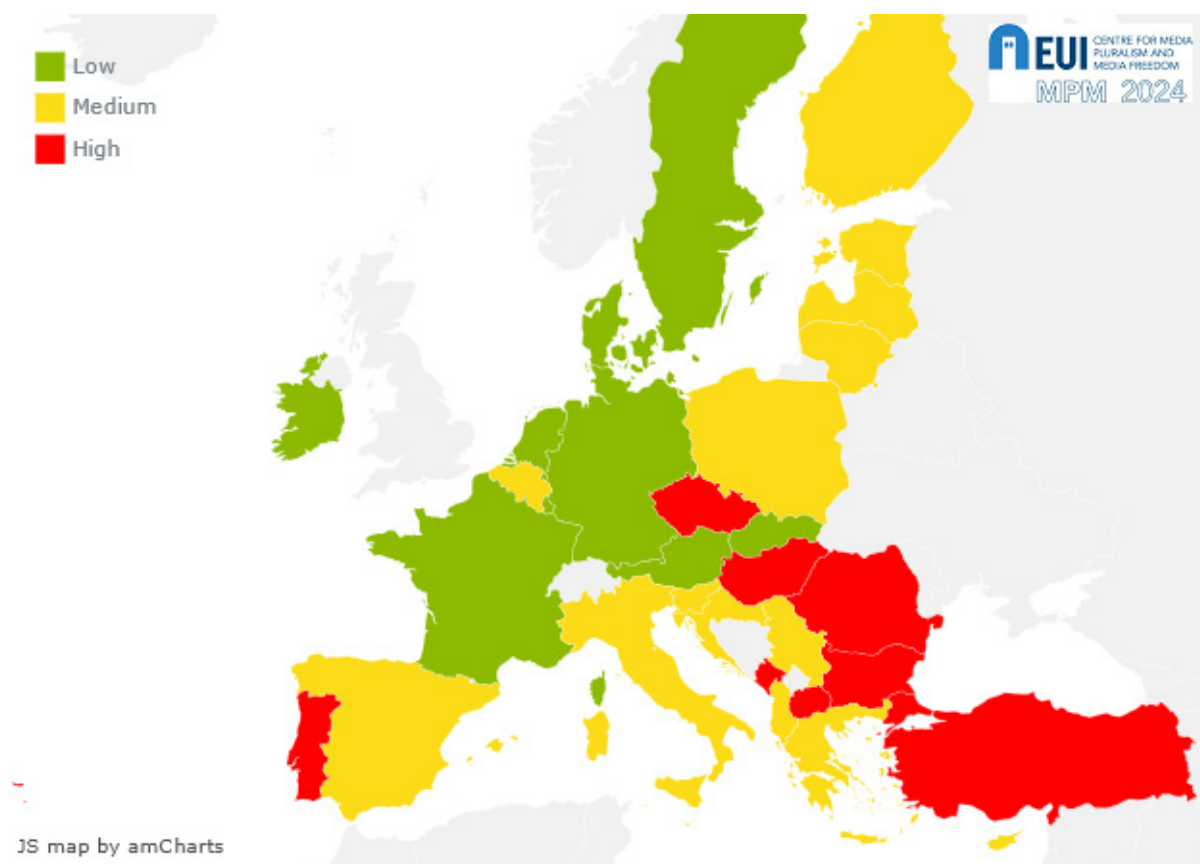
Media at the regional and local level are particularly important for democracy, since their relationship with local audiences tends to be closer, if compared to the national media. That proximity is confirmed by both the user statistics and the level of the participation of users in the media. A solid regulatory framework and support measures can help regional media in their democratic mission (European Digital Observatory, 2016). This is becoming increasingly important now, when more and more local and regional newspapers and broadcasters are struggling to survive. Community media are also critical in ensuring media pluralism, and they are an indicator of a sound democratic society. They tend to focus on local issues, and they can contribute to facilitating local discussions (UNESCO, 2017). In the MPM, community media are defined as being those media that are non-profit and accountable to the community they seek to serve. They are open to the participation of the members of the community for the creation of content. As such, they are a distinct group within the media sector, alongside commercial and public media. Community media are addressed to specific target groups, and social benefit is their primary concern.

This indicator assesses whether local and regional communities are guaranteed access to the media, both in terms of legal safeguards and policy or financial support. It also covers community media, both from the point of view of the legal and practical guarantees of access to infrastructures and independence, and in terms of policy measures. As the name indicates, this indicator is composed of two sub-indicators:

- *Local and regional media,*
- *Community media.*

The risk associated with the indicator on **Local, regional and community media** remains within the medium range, at 45% for EU Member States (+4pp compared to the MPM2022) and 49% for all the countries studied (+5pp). Only nine countries scored within the low-risk band, while 15 scored in the medium-risk band and eight in the high-risk band (see Figure 6.2.a). In line with the previous editions of the MPM, the sub-indicator on *Regional and local media* is associated with a medium-risk score (45% for all countries studied), slightly lower than the risk for the sub-indicator on *Community media* (**53%**).

Figure 6.2.a. Indicator on Local, regional and community media - map of risks per country



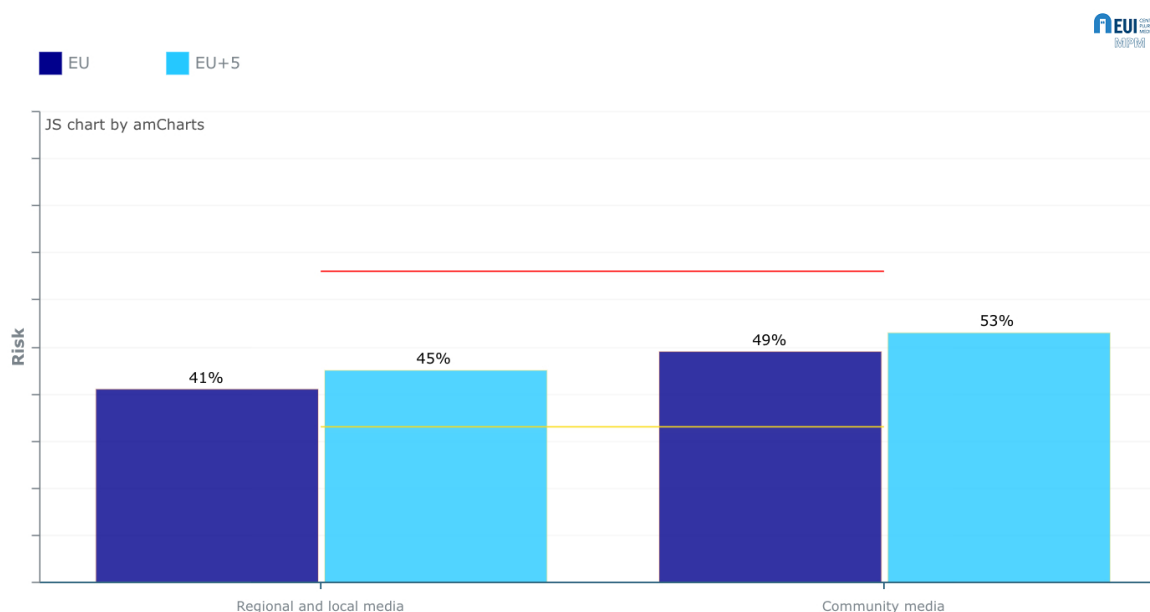
Among the most important observations this year, it is important to highlight the following:

- Slovakia confirms for the second year in a row the low risk associated with local and community media, after the positive change brought about by the new Act No. 264/2022 Coll., on Media Services in 2022 (Urbaniková, 2022). However, the risk score has increased to 31% (+12pp), taking into account that the local media are still in a precarious economic situation, in the absence of state subsidies (Urbaniková, 2024). It is also important to mention that Transparency International Slovensko (2024) has alerted the existence of media deserts (cited in Urbaniková, 2024) and the scarcity of independent local and regional media outlets.
- Italy's score shifted to the medium-risk band, with 38%. As summarised by Vigevani et al. (2024), "the main sources of risk consist of market difficulties that make it hard for local media to achieve economic self-sufficiency, as well as inconsistencies in the public subsidy system (which are a crucial source of support). Legislative norms governing community media also do not explicitly guarantee access to platforms (though access is actually granted if they fall within the definition of local media), nor do they regulate the independence of such media".
- Belgium has shifted to the medium-risk band with 44%. As explained by Valcke & Wauters (2024), "the fragmentation of Belgium's media landscape remains at the core of Belgium's challenges. With three different communities sharing powers over media affairs, attempts to guarantee inclusion of minorities has proven difficult".

Two countries are associated with a minimal risk for this indicator: Germany and the Netherlands. Both are characterised by a strong legal framework that demonstrates a commitment to favour the development of local media and to tackle the creation of news deserts.

- In Germany, the Media State Treaty states that regional public service broadcasters have no mandate for local reporting (§ 30 Abs. 5 Nr. 3. MStV). Public regional TV can only report on large metropolitan areas, while regional radio stations must focus on regional issues. Local reporting is reserved exclusively for private broadcasters and the press in order to protect these branches. In the online sector, there is an explicit ban on local public service reporting (Kalbhenn, 2024).
- In the Netherlands, the update of the Media Act in 2020 has led to the implementation of a policy framework to support local and regional media (de Swert et al., 2024). Such a framework sketches the future of local media towards more independence and professionalisation (Rijksoverheid, 2023 cited in de Swert et al., 2024). This includes collaborations between national and regional broadcasters, and more direct subsidies from local and regional media. In such a context, it appears that hyperlocal digital-native media tend to emerge to fill the gap created by potential news deserts (Negreira-Reyn et al., 2023, cited in de Swert et al., 2024).

Figure 6.2.b. Indicator on Local, regional and community media - averages per sub-indicators



Regional and local media

A closer look at the results for the different variables composing the sub-indicators show that:

- In most of the EU Member States, the law grants regional and local media access to TV and radio infrastructures, with the notable exceptions of Finland, Hungary, Portugal, and the Czech Republic. The risk is higher in candidate countries, especially in Montenegro and in the Republic of North Macedonia, in the absence of legal provisions.
- The existence of news deserts, defined as “geographic or administrative area, or a social community, where it is difficult or impossible to access sufficient, reliable, diverse information from independent local, regional and community media” (Verza et al., 2024), is a growing problem in most of the countries studied. All the countries studied scored either in the medium or in the high-risk band, except for three: Finland, Germany, and the Netherlands. Even if the risk is assessed as low in these three countries, the development or widening of potential media deserts is still considered a concern. For example, Ylikoski and Ala-Fossi (2024) explain that even though there are, strictly speaking, no media deserts in mainland Finland, as all the municipalities are covered by at least one news media outlet, there are 309 municipalities in which there is no resident journalist, or only one.

- The main issues faced by local and regional media are economic, and in most countries, public subsidies, when they exist, are not sufficient to ensure a thriving regional and local media ecosystem. Public subsidies are considered to be sufficient in only five countries: Austria, Denmark, Hungary, Spain, and the Netherlands. However, in Hungary, public subsidies are often linked to political capture (Bleyer-Simon et al., 2024).
- In most countries, public service media offer sufficient local coverage and tend to maintain a stable network of local correspondents. Only five countries score within the high-risk band regarding local coverage by public service media: Belgium, Greece, Hungary, Latvia, and the Republic of North Macedonia. In Latvia, public television only has a news correspondent in the Latgale region. To cover other regions, public television commissions content from local and regional private TV stations (Rozukalne & Skulte, 2024).
- For candidate countries, the risk associated is significantly higher regarding local and regional media than for EU Member States.

On a positive note, regarding local media, some interesting initiatives have been developed in Poland. In October 2023, a national local media cluster called "Lokalsi" was created in order to represent local outlets in financial negotiations with platforms, and to face existing economic and technological barriers. It gathers small publishers (in total, 70 local outlets), reaching around 8.5 million unique users (Klimkiewicz, 2024).

Community media

As far as *Community media* is concerned, the risk remains in the medium-risk band, at 48% for EU Member States. However, it is in the high-risk band of 75% for candidate countries. In the European Member States, several factors of risk can be identified:

- Half of the countries studied are still lacking a suitable legal framework to recognise Community media as a separate category. In this context, a suitable legal framework entails: 1/ the recognition of community media as a separate category (eventually as local public media such as in the Netherlands); 2/ guaranteed access to frequencies; and 3/ the existence of dedicated funds to support their development. Currently, in the European Union, only 18 countries among the 27 EU Member States have adopted some form of legal recognition for community media (Palmer & Seethaler, 2024); and only five countries have must-carry rules that guarantee community media access to TV/Radio infrastructures and frequencies (legally, and in practice), namely Germany, France, Ireland, Slovakia, and Sweden.
- In the absence of these three components, the blossoming of a community media ecosystem is often limited, mostly due to the difficulties in getting subsidies. The amount

of subsidies is assessed as sufficient in only four countries: Denmark, Germany, Luxembourg, and Sweden. Luxembourg, however, has only one community radio, Radio Ara. In May 2021, Radio ARA signed a pluriannual convention with the state, allocating €250,000 per year until 2025. This convention aims at stabilising the rocky financial situation of the community radio. However, Ara considers that this may not be sufficient in the long term (Kies & Lukasik, 2024).

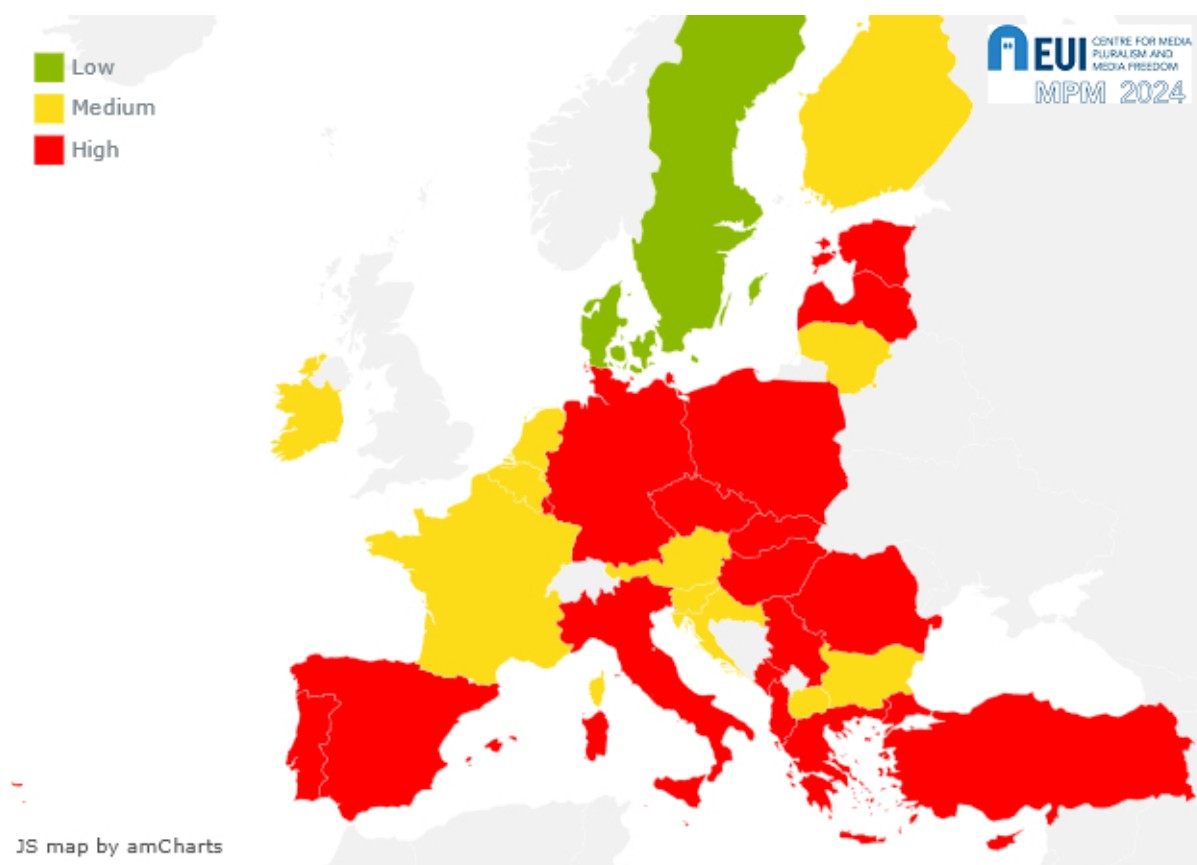
- If they exist, community media generally tend to be independent. There are, however, some notable exceptions such as Hungary. As pointed out by Bleyer-Simon and al. (2024), “in practice this category of media services has lost its original functions. As community media service providers are exempt from media service fees, politically supported talk radio networks and church radios started bidding as community radios. The Mérték Media Monitor analysed radio tenders between January 2018 and April 2021 and found that the winners were in most cases pro-government bidders, both in the case of community and commercial frequencies”.
- In Serbia, the recent legal changes have contributed to lowering the risk associated with community media; As explained by Milutinović (2024), “the Law on Electronic Media (LEM) recognises civil sector media as a third kind of supplier of media services and lists them in a separate category that lies somewhere between the public media service and commercial media (Art. 57). The Law of Public Information and Media recognises media services of the civil sector as non-profit media (Art. 36 LPIM). According to LEM and LPIM, civil sector media are required, as public media services are too, to adjust their content to the public interest, as it is defined in the Law.”
- In terms of community media, it is also interesting to highlight the specificity of Luxembourg. In addition to community TV and radio, Luxembourg also has a definition of “Citizen publishers” for online and print community media⁵⁰. The law also mentions an annual subsidy of €100,000 with conditions. Currently, Forum.lu benefits from such subsidies (Kies & Lukasik, 2024).

50 Art. 9 of the bill an aid scheme for professional journalism - « Loi du 30 juillet 2021 relative à un régime d’aides en faveur du journalisme professionnel”.

6.3 Gender equality in the media

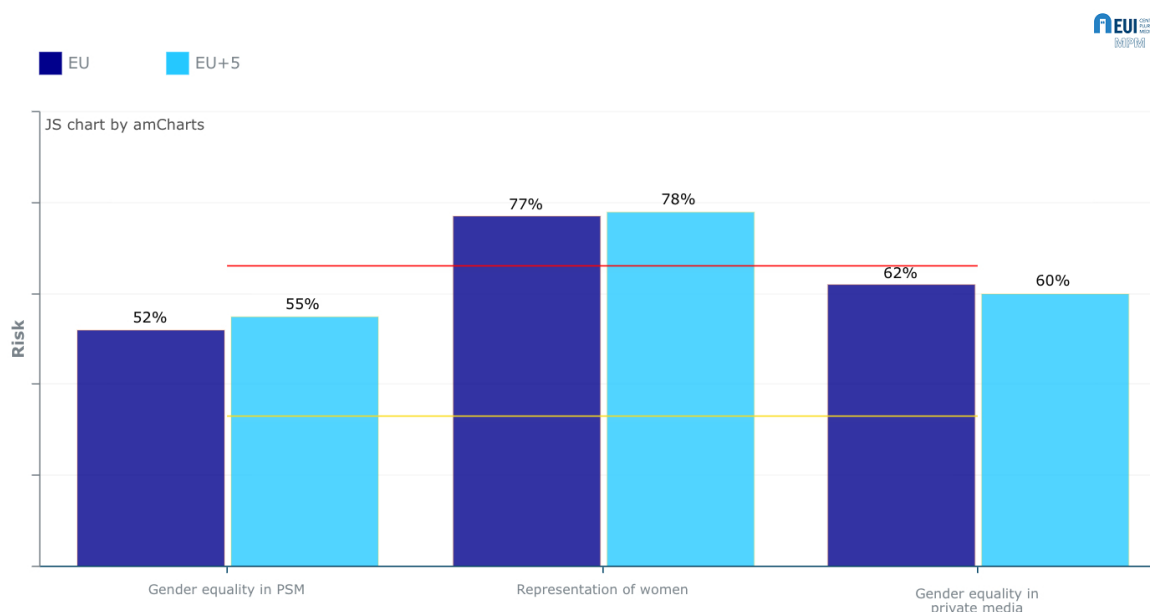
Gender equality is a fundamental value (Treaty on the European Union, 2008) and is a strategic objective of the EU (European Commission, 2015). The Council of Europe (2013) considers gender equality to be an integral part of human rights, interrelated with media freedom, including editorial freedom, and it goes hand-in-hand with the freedom of expression. However, gender gaps are still a reality in the media sector. The EU-wide study, conducted by the European Institute for Gender Equality (EIGE 2012), stresses that significant inequalities, including under-representation and career barriers, remain entrenched in the media sector. The indicator Gender equality in the media evaluates the existence, comprehensiveness, and implementation of gender equality policies within the public service media. It also assesses gender parity in media production and, more specifically, in management-level positions, as well as the representation of women in political and news content.

Figure 6.3.a. Indicator on Gender equality in the media - map of risks per country



The indicator scores within the medium-risk band, with an average risk of 63% for EU Member States, and 64% combined for EU Member States and candidate countries. However, when taken separately, candidate countries score in the high-risk band with 69%. As displayed in Figure 6.3a, only two countries are associated with a low risk in relation to **Gender equality in the media**: Denmark and Sweden, Sweden being very close to the medium-risk with 32%. The majority of the countries score within the high-risk band (19 in total), while 11 score within the medium-risk band. Except for the Republic of North Macedonia, all the candidate countries score within the high-risk band.

Figure 6.3.b. Indicator on Gender equality in the media - averages per sub-indicator



Gender equality in public service media

In general, public service media tend to perform better in terms of gender equality than private media companies in the EU, and in EU Member States + 5 candidate countries. The average risk for EU Member States for this sub-indicator is assessed at 52%, while the one associated with gender equality in private media companies reaches 62%. This is mostly linked to the existence of gender equality policies that impose gender parity within the management board of PSM. A comparison between figures 6.3c and 6.3d demonstrates that women are relatively better represented in PSM management boards.

Figure 6.3.c. Variable What is the share of women among members of management boards of PSM? - average risk score per variable

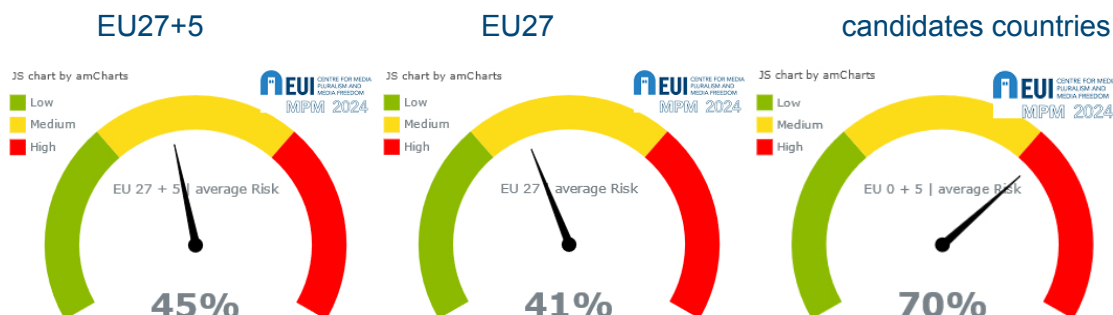
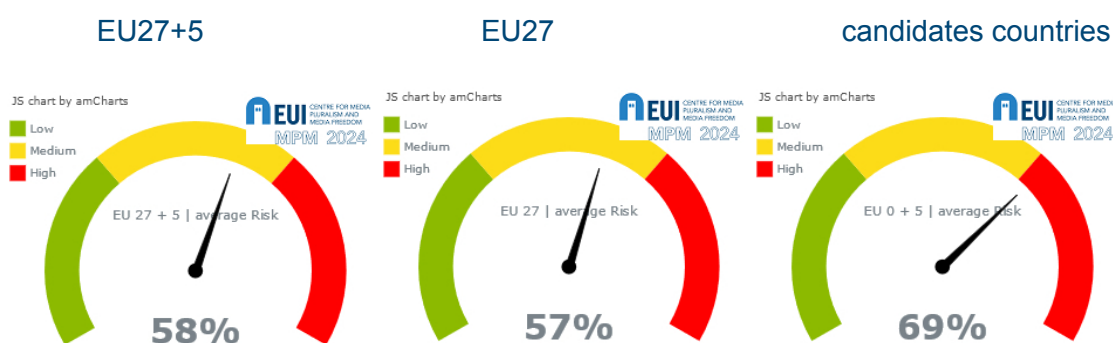
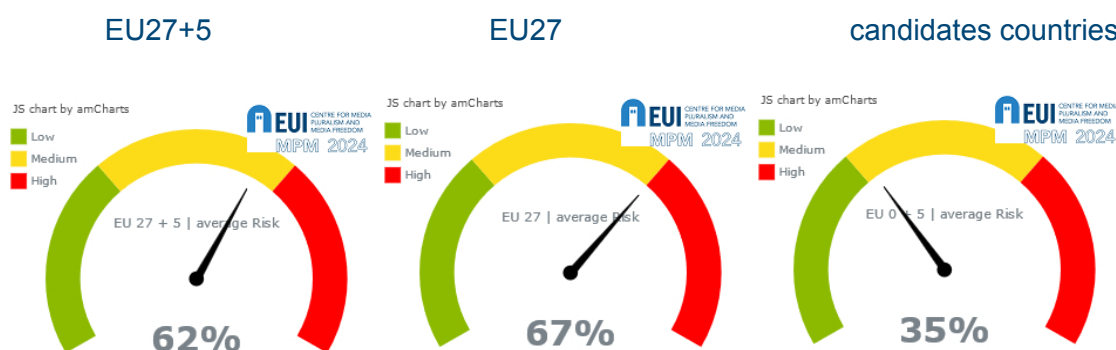


Figure 6.3.d. Variable What is the share of women among members of management boards of Private TV companies? - average risk score per variable



It is interesting to note that, when taken separately from EU Member States, Candidate countries score better gender equality in private media companies than in PSM. The risk linked to gender equality in private media for candidate countries only is assessed at 53% (-10pp difference with EU Member States), and the risk for public service media is assessed at 72% (+20pp difference). The higher risk associated with gender equality in PSM for candidate countries can be explained by the absence of gender equality policies in PSM in most candidate countries. The lower risk regarding gender equality in private media can, on the contrary, be explained by the better representation of women among executives of private TV companies in candidate countries than in EU Member States (see Figure 6.3.e.) despite a high risk representation in management boards (see Figure 6.3.d).

Figure 6.3.e. Variable What is the share of women among executives of Private TV companies? - averages per variable



The 2024 edition of the MPM has demonstrated the following:

- Only 17 countries have some form of PSM gender equality policy. Gender equality policies can include general legal frameworks on gender equality, the inclusion of gender-specific measures in the Broadcasting Act or in the PSM service contracts, and/or self-regulatory guidelines (declaration, charters, style books) implemented by PSM.
- In only seven countries can the existing gender equality policy be considered as comprehensive PSM gender equality policies: Belgium, Denmark, Finland, France, Germany, Portugal, and Sweden. Most of these countries have a long tradition in the field.
- Two candidate countries have adopted some measures to favour gender equality in the media: Albania and Montenegro. In Albania, the new Law on Audiovisual Media and the new Broadcasting Code include some provisions regarding gender equality. On the one hand, Article 4 of the new Law on Audiovisual Media guarantees the principle of gender equality and non-discrimination, and prohibits sexism in the media and stereotypical gender representation in the audiovisual media. On the other hand, points 5.1, 5.2 and 5.3 of the new Broadcasting Code focus on improving the representation of women in media content, prohibiting gender-based discrimination and sexism, stereotypical images and representations of women, as well as sexual objectification. A balanced representation of women in news production is also targeted in point 5.6, which encourages broadcasters to develop broader equality and diversity policies, and point 5.7, which suggested a balanced gender presence in programmes (Likmeta & Voko, 2024). As for Montenegro, the national public broadcaster PBS adopted the first gender equality plan for the period 2023-2027 in December 2023. According to Brkic Ruzic (2024), the adoption of a gender equality policy regarding employment, professional advancement and decision-making is one of the identified measures.

- Over the implementations of the MPM, a correlation between the existence of gender equality policies and the proportion of women in management has been observed (Palmer & Urbaniková, 2024). However, parity is not achieved by the PSM management boards of three countries, which are deemed to have a comprehensive gender equality policy: Germany, Lithuania, and Portugal. In Germany, while parity is achieved in the management board of national PSM, women are still poorly represented in (sometimes even absent from) the management boards of federal public service media (Kalbhenn, 2024).

Gender equality in private media companies

- Private companies achieve gender equality in the management boards of private companies in only ten countries. This is slightly less than in the case of public service media (13 countries). Gender equality is achieved both in the management board of private service media and of private media in only five countries: Croatia, Denmark, Finland, France, and Italy.
- Nineteen countries score in the high-risk band regarding the share of women among executives of private TV companies. This proportion is similar to what was observed in the previous implementation of the MPM. It is interesting however to note that three candidate countries are scoring within the low-risk band: Albania, Montenegro, and Serbia. For example, in Albania, the two main commercial TV stations, TV Klan and Top Channel, have a female CEO (Likmeta & Voko, 2024).
- Only ten countries are in the low-risk band regarding the share of women among editors-in-chief of the main media companies, among which we find two candidate countries: Turkey and The Republic of North Macedonia.

Representation of women in the media

Representation of women in the media remains in the high-risk band, with 77% for EU Member States and 83% for candidate countries. This is the highest-scoring sub-indicator of the **Social Inclusiveness** area, and the eighth-highest-scoring sub-indicator of the MPM, following the sub-indicators related to *Plurality of media providers*, *Plurality in the digital market* and *Editorial independence from commercial and owners influence*. This is also the only indicator in the area of **Social Inclusiveness** for which none of the countries studied scored in the low-risk band.

Among the observations that can be extracted from the data collection, we can highlight the following:

- Based on the previous implementation of the MPM, Palmer & Urbaniková (2024) observed that there is a negative correlation between the representation of women among editors-in-chief and the fair representation of women in the news. This is confirmed in the case of Turkey for example. According to Inceoglu et al. (2024), the presence of female editors-in-chief in the main media companies was, in itself, not enough to solve many of the problems related to the representation of women in Turkish media.
- In most countries, there are initiatives to increase the number of female experts in the media, such as in Turkey, the two platforms Sensiz Olmaz Sessiz Olmaz and Mor Fihrist (Inceoglu et al., 2024).
- In most countries, there is no systematic monitoring and data to measure the representation of women, be it quantitative monitoring of the share of women in the news or qualitative monitoring of the content of the news. No data answers account for 21% of the total answers.
- There are a few examples of self-monitoring. This is, for example, the case in Finland, where the national newspaper Helsingin Sanomat and PSM Yle, have been monitoring their content for several years. As far as Yle is concerned, they have developed an automated tool to track their news sources (Ylikoski & Ala-Fossi, 2024).
- In some cases, it seems that there is simply no visible interest in the question on the representation of women in the media. This seems, for example, to be the case in Estonia. According to Barbi Pilvre, journalist and lecturer at the University of Tallinn (cited in Palmer & Žuffová, 2024), the question of gender equality in the media is not well-studied in Estonia, because there is a “complete lack of interest in the topic” and “Gender equality is not perceived as relevant, especially for generations over 30”.

6.4 Media literacy

Media literacy is a fundamental prerequisite of an accessible media system and is a core element of media pluralism. People need to master media literacy skills in order to fully enjoy fundamental rights, such as freedom of expression and access to information (UNESCO, 2013). The European Commission considers the promotion of media literacy to be one of the key follow-up actions of the Annual Colloquium on Fundamental Rights in 2016.⁵¹ Moreover, the Audiovisual Media Services Directive (AVMSD, 2018) requires both the development of media literacy in all sections of society, and the measurement of its progress.⁵² The Monitor bases its definition of media literacy on both the AVMSD's text and the European Association for Viewers Interests' (EAVI) media literacy study, which was carried out in 2009: "Media literacy is an individual's capacity to interpret autonomously and critically the flow, substance, value and consequence of media in all its many forms" (EAVI, 2009). "Media literacy' refers to skills, knowledge and understanding that allow citizens to use the media effectively and safely. To enable citizens to access information and to use, critically assess and create media content responsibly and safely, citizens need to possess advanced media literacy skills. Media literacy should not be limited to learning about tools and technologies but should aim to equip citizens with the critical thinking skills required to exercise judgement, analyse complex realities and recognise the difference between opinion and fact" (AVMSD, 2018, p.59).

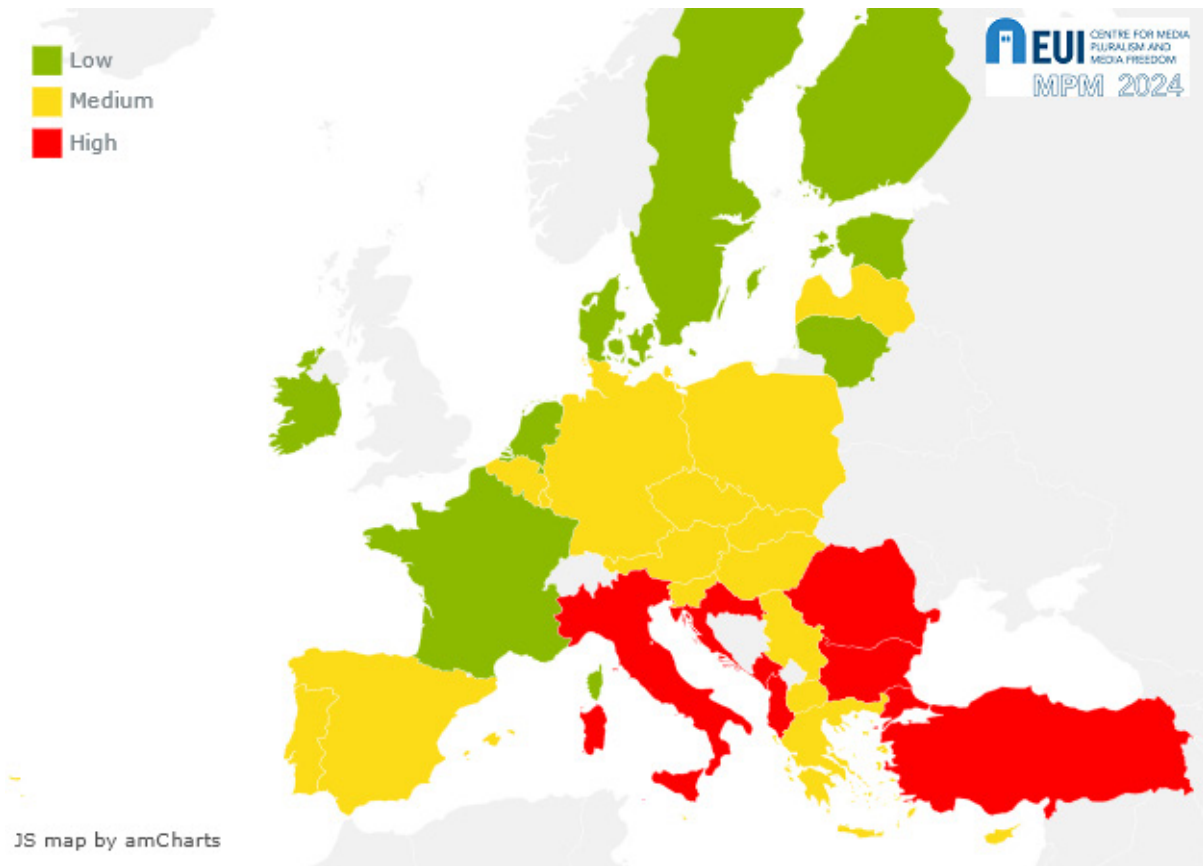
The MPM indicator covers two major dimensions of media literacy: environmental factors and individual competencies, which follow the logic of the categorisation used by EAVI (2009). EAVI defines environmental factors as being a set of contextual factors that have an impact on the broad span of media literacy, including informational availability, media policy, education and the roles and responsibilities of stakeholders in the media community. Individual competencies are defined as an individual's capacity to exercise certain skills (including, inter alia, cognitive processing, analysis, and communication). These competencies draw on a broad range of capabilities and embrace increasing levels of awareness, the capacity for critical thought and the ability to produce and communicate a message (EAVI, 2009).

The risk associated with the indicator **Media literacy** is medium, with 45% for EU Member States (-5pp compared to last year) and 48% for all the countries studied (-5pp). After a significant increase last year due to a re-evaluation of the existing risk levels, in line with the content of the AVMSD, the risk level came back to the level observed in the MPM2022 mostly linked to methodological changes (see Annexe 1). The majority of the countries studied, 17 in total, score within the medium-risk band. Only eight countries score within the low-risk band. This shows an improvement compared to the previous editions, as four countries have shifted from the high-risk band to the medium-risk band. All the sub-indicators composing this indicator score within the medium-risk band.

51 <https://ec.europa.eu/newsroom/just/items/31198>

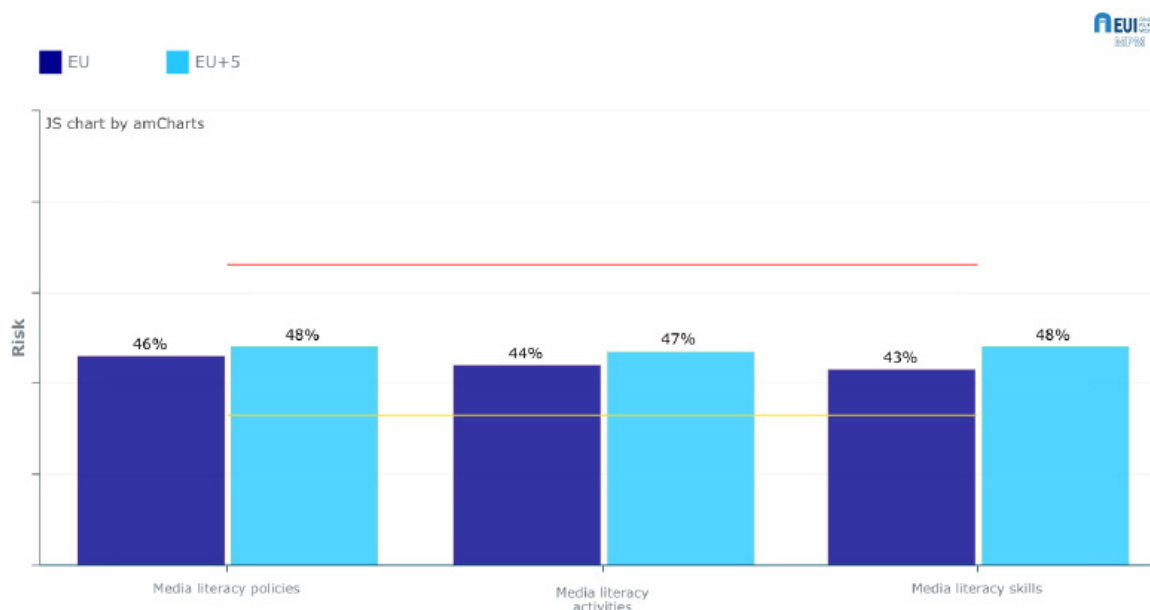
52 <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>

Figure 6.4.a. Indicator on Media literacy - map of risks per country



Estonia is among the best performing countries in terms of **Media literacy**. The country has a long media literacy tradition, and media literacy has been part of the mandatory education curriculum in Estonian for more than ten years. Since 2023, media literacy is also part of the mandatory education curriculum in Russian-speaking schools, with an *ad hoc* programme developed in Russian. Besides, many grassroots initiatives are conducted by civil society actors, including the Estonian Debating Society and Propastop, among others (Palmer & Žuffová, 2024).

Figure 6.4.b. Indicator on Media literacy - averages per sub-indicator



Media Literacy Policies

The risk associated with *media literacy policies* has significantly decreased compared to the previous edition of the MPM, with 46% for EU Member States (-6pp) and 48% including the candidate countries (-5pp).

- Only four countries do not have a media literacy policy, or their existing media literacy policy is underdeveloped: Croatia, the Czech Republic, Hungary, and Romania. In the Czech Republic, for example, Štětka et al. (2024) explain that there is still no official strategy to develop media literacy among different population groups (for instance, among secondary vocational school students), despite an increased perception of the importance of media literacy in the country.
- However, only six countries have a media literacy policy that is considered comprehensive and up-to-date: Denmark, Estonia, Finland, France, the Netherlands, and Sweden. In most of these countries, the media literacy policy has been actualised in the past years in order to remain up to date. For example, in Denmark, the new media agreement developed by the Ministry of Culture in 2023 aims at strengthening media literacy and digital education and is providing an annual allocation (DKK3.1 million) until 2026 to the Media Council for Children and Young People's (Simonsen, 2024). In Sweden, the Swedish National Agency for Education is working on a national digitisation strategy for the school system, which includes media literacy, spanning from 2023 to 2027 (Färdigh, 2024).

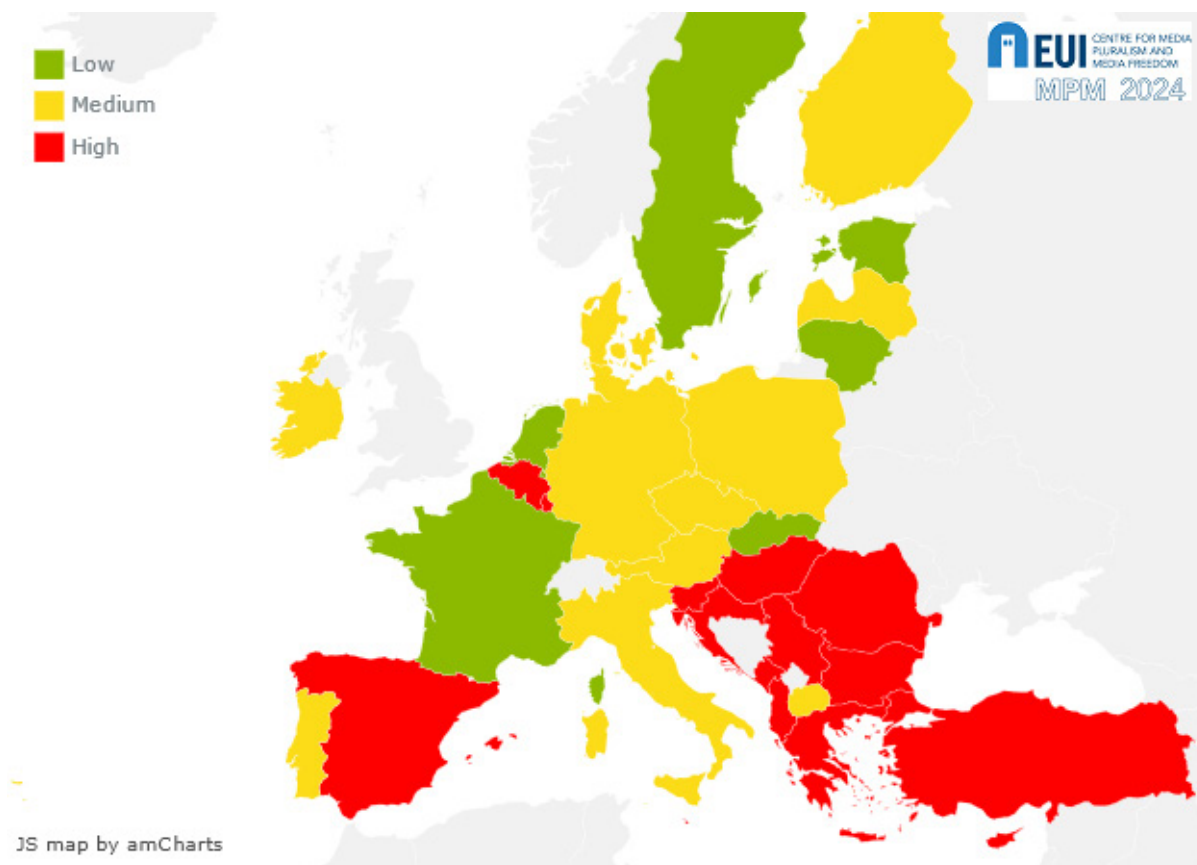
Media literacy activities

Media literacy activities are associated with a risk level of 44% for EU Member States (-2pp) and 47% for all countries studied (-2pp). Only eight countries score in the low-risk band: Denmark, Estonia, Finland, France, Germany, Lithuania, the Netherlands, and Sweden.

- Media literacy is part of the compulsory education curriculum in only eight countries: Austria, Denmark, Estonia, Finland, France, Lithuania, the Netherlands and Sweden. For example, in Austria, “[b]asic digital education’ has been compulsory at Austrian regular secondary schools and the lower stage of secondary academic school. Digital skills have now also been incorporated into the curriculum for elementary school, starting from the first grade” (Seethaler & Beaufort, 2024).
- Media literacy is in practice almost absent from the school curriculum in eight countries: Hungary, Malta, Montenegro, Poland, Portugal, Serbia, Slovenia, and Romania. In Romania, some elements of media literacy education can be found scattered in various classes, yet there is no media literacy education properly speaking (Toma & al., 2024).
- In most countries, media literacy activities target mostly young school children. In only five countries, initiatives targeting other vulnerable components of the population are conducted: Denmark, Finland, Lithuania, the Netherlands, and Sweden. In the Netherlands, the government launched initiatives such as DigiHAndig, or support in public libraries, in order to compensate for the fact that most media literacy activities are proposed online and can exclude the most vulnerable people (de Swert et al., 2024).
- In most countries, media literacy activities are not part of a comprehensive strategy. This is reflected by the fact that 24 countries score either within the medium or high-risk band.

Media literacy skills

Figure 6.4.c. Sub-indicator on Media literacy skills - map of risks per country



Eight countries score within the low-risk band regarding *media literacy skills*: the Czech Republic, Denmark, Estonia, Finland, Hungary, Ireland, the Netherlands, and Sweden. The geographical division of the countries (see Figure 6.4.c) shows that Scandinavian and Northern countries are performing well, while the rest of Europe is either associated with medium or high risk, except the Czech Republic and Hungary. Among them, Germany and Italy are scoring within the high-risk band. The main observations are the following:

- A low risk in both media literacy policies and in media literacy activities sub-indicators does not guarantee a low risk regarding media literacy skills. This is, for example, the case in France. Ouakrat and Sklower (2024) acknowledge that, despite the efforts made to strengthen existing media literacy policies and to multiply media literacy activities, “media education cannot thwart structural factors and their effects, among which growing attitudes of indifference or defiance towards the news and the political realm, especially among younger generations”. A similar observation can be made about Italy (Vigevani et al., 2024).

- The high risk assessed in Germany may reflect important differences between regions. In Germany, media literacy and education policies are defined at the federal level (Kalbhenn, 2024).
- According to the Eurostat (2024) dataset used for the sub-indicator on media literacy skills, the share of the population with basic or above basic individual information and data literacy skills in Hungary is estimated to be 89% (Eurostat, 2024), well above the EU average. Hungary therefore scores in the low-risk band for media literacy skills. However, such a score is surprising and not in line with the European Media Literacy Index 2023 (OSIS, 2023), which estimates that Hungary is in the 3rd cluster (only Cyprus, Greece, Romania, and Bulgaria score lower, if looking at EU countries) (Bleyer-Simon et al., 2024). The difference of evaluation could not be explained and will be monitored carefully in the future implementations of the MPM.

6.5 Protection against disinformation and hate speech

*The indicator **Protection against disinformation and hate speech** assesses the effectiveness of regulation and of other activities that seek to combat, or prevent, the spread of disinformation and hate speech in our societies. First disinformation is verifiably false or misleading content that is not illegal, but still has a potential to cause severe harm. It can polarise debates, and create or deepen tensions in society. It can erode trust in institutions and in news media. In doing so, it can cause public harm, be a threat to democratic political and policymaking processes, undermine electoral systems, and it may even put the protection of citizens' health and security at risk, since it hampers the citizens' ability to make informed decisions, and may decrease the effectiveness of public health campaigns. In many cases not being illegal, action taken against disinformation (or especially unintentionally-spread false information, referred to as "misinformation") can lead to unnecessary limitations to freedom of speech; thus policymakers need to be aware of inadvertent side-effects. Second, hate speech prompting racism and xenophobia is clearly illegal, and is a "direct violation of the principles of liberty, democracy, respect for human rights and fundamental freedoms and the rule of law, principles upon which the European Union is founded, and which are common to the Member States" (Council of the EU 2008 Framework Decision on Combating Certain Forms and Expressions of Racism and Xenophobia⁵³).*

This indicator is composed of two sub-indicators:

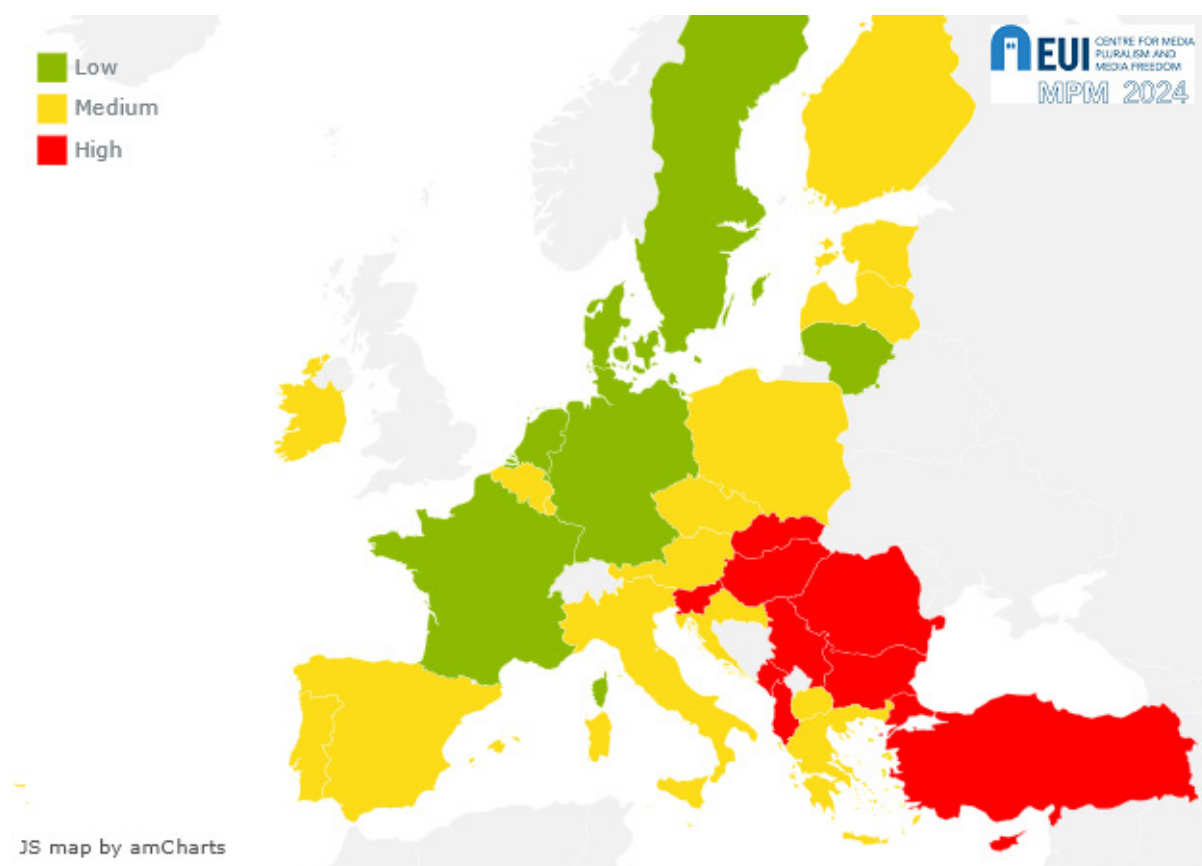
- *Protection against disinformation. This sub-indicator assesses whether there is a comprehensive strategy to counter disinformation, including a variety of stakeholders: public institutions, fact-checkers, and researchers. It also assesses whether such a strategy has been efficient in reducing the prevalence of disinformation, while*

⁵³ <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32008F0913>

not presenting a risk to the freedom of expression. The definition of disinformation that is used here is based on the Report of the Independent High-Level Expert Group on Fake News and Online Disinformation (2018)⁵⁴.

- *Protection against hate speech.* This sub-indicator assesses the efforts made to combat and prevent the spread of hate speech online. The definition of hate speech used here is based on the Code of Conduct on Countering Illegal Hate Speech 201655, and on the EU Directive 2018/1808 (Audiovisual Media Services⁵⁶) Art. 28b on video sharing platforms.

Figure 6.5.a. Indicator on Protection against disinformation and hate speech - map of risks per country



Protection against disinformation and hate speech remains in the medium-risk band with 52% for EU Member States, and 54% (-6pp), for all the countries studied. Most countries score either in the medium or high-risk band, except six countries: Denmark, France, Germany, Lithuania, the Netherlands, and Sweden (see Figure 6.5.a). The risk associated with *Protection against disinformation* is slightly higher (59% for all coun-

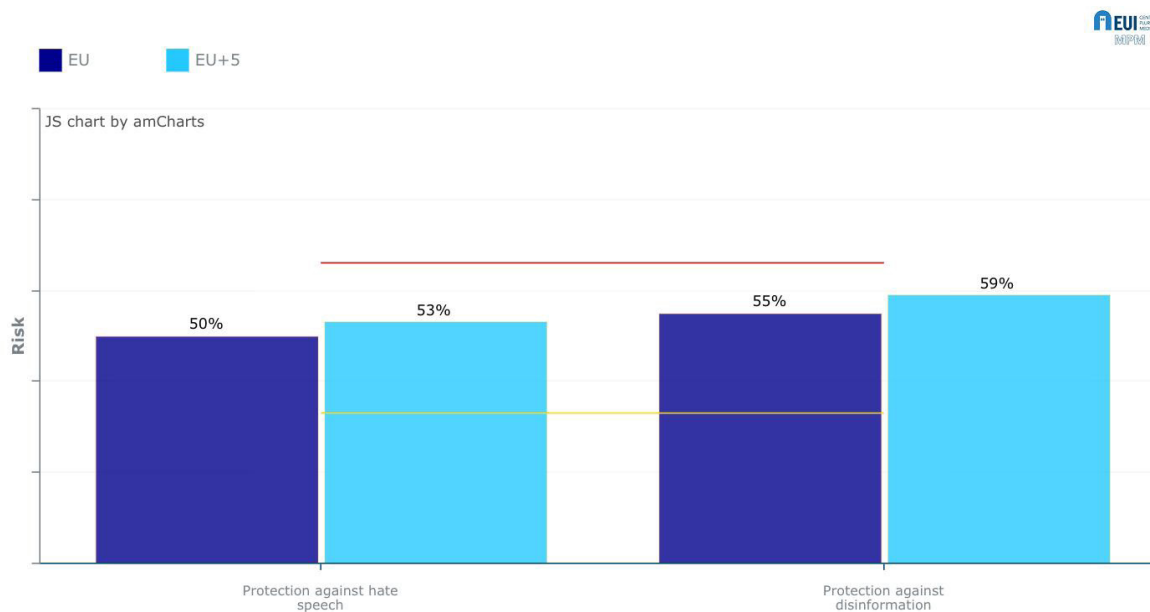
54 <https://op.europa.eu/en/publication-detail/-/publication/6ef4df8b-4cea-11e8-be1d-01aa75ed71a1>

55 https://ec.europa.eu/commission/presscorner/detail/en/qanda_20_1135

56 <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>

tries studied, -1pp compared to the MPM2023) than the one associated with *Protection against hate speech* (54% for all countries studied, +3pp). When taken separately, the average risk for candidate countries is within the high-risk band for both sub-indicators with respectively 78% and 71%. With the exception of the Republic of North Macedonia, all the candidate countries score within the high-risk band.

Figure 6.5.b. Indicator on Protection against disinformation and hate speech - averages per sub-indicator



Protection against disinformation

Half of the countries studied are still scoring within the high-risk band. However, the decrease of the risk level for this sub-indicator demonstrates a rising awareness regarding the need to develop strategies to fight disinformation. The main observations regarding disinformation for 2023 are the following:

- The average risk associated with the spread of disinformation is considered as high, with 71% for all countries studied.
- The main issue linked to the protection against disinformation is the absence of a comprehensive strategy, which clearly defines the role of the different stakeholders involved. Most of the countries have at best a nascent strategy.
- Six countries have taken significant steps towards the development of comprehensive strategies against disinformation: Estonia, Finland, France, Germany, Ireland, and Lithuania. France and Germany adopted early on a legal framework to fight disinformation. In Ireland, for example, a National Counter-Disinformation Strategy Group was created in 2023; it includes representatives from EDMO Ireland, Technol-

ogy Ireland, the Irish Council for Civil Liberties, the Press Council, the *Coimisiún na Meán*/Media Commission, the Library Association of Ireland, and the National Youth Council of Ireland.

- The Baltic countries are performing well in terms of protection against disinformation. Estonia has adopted a strategy to tackle disinformation, based on five core elements: 1/ Strategic communication, 2/ Media policies, 3/ International collaboration, 4/ Media literacy, and 5/ a State Electoral Office to avoid foreign influence on elections (see Voltri, 2022 cited in Palmer & Žuffová, 2024). In Lithuania, a similar approach is taken. The National Crisis Management Centre (NCCC, Nacionalinis krizių valdymo centras) coordinates activities in information threat prevention and counteraction, including some monitoring of information-based incidents (Jamstraskis & Balcytiene, 2024).
- In such a context, the situation in the Czech Republic is one-of-a-kind. The Media and Disinformation Commissioner was dismissed and the national plan to tackle disinformation was cancelled. The fight against disinformation is now assigned to the National Security Advisor. According to Štětka et al. (2024), “the current dominance of reactive rather than proactive government approaches to combating disinformation and pursuing strategic communication makes the Czech audiences more susceptible to manipulative influences and narratives’.

Protection against hate speech

- Only four countries are scoring in the low-risk band regarding Protection against hate speech: Denmark, Germany, Greece, and Sweden. In Greece, the existing framework to fight hate speech includes both legal and self-regulatory measures. Law 4779/2021 transposes the AVMSD and introduces inter alia measures to protect the general public from programmes containing incitement to violence or hatred directed against a group of persons. In particular, according to Article 8, audiovisual services must not incite violence or hatred against a group of people, or a group of people identified based on race, colour, ethnicity, descent, religion, disability, sexual orientation, identity, or gender characteristics. Self-regulatory measures include the digital media Code of Ethics by ENED in 2023. The effectiveness of these measures needs further evaluation (Papadopoulou & Angelou, 2024).
- In most countries, the existing framework targets major hate crimes and is not well adapted to targeting online hate speech. This is, for example, the case in Croatia, as explained by Bilić & Petričusić (2024): “Hate speech constitutes a criminal offence (Public incitement to violence and hatred, Art. 325. CC) and some misdemeanours. However, these laws are not consistently applied, and there is an inevitable confusion as to when certain conduct constitutes a criminal offence and when it should be treated as a misdemeanour”.

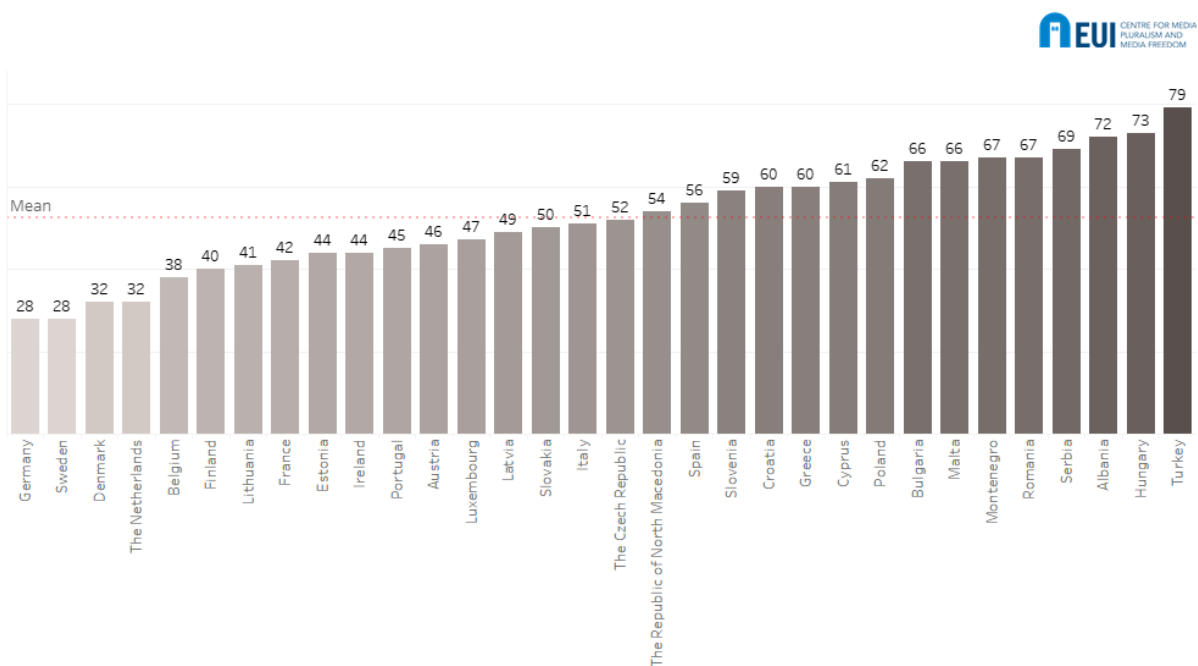
- The adoption of laws against hate speech can be problematic in some countries. This is the case for example in Ireland and Estonia. In Ireland, the Criminal Justice Act (Incitement to Violence or Hatred and Hate Offences) bill was passed by the lower house of the Irish Parliament in the summer of 2023 and is currently before the upper house. The bill has been criticised as threatening freedom of speech (Flynn, 2024).
- Some efforts have been made regarding the existence of mechanisms to report hate speech. However, even with the existence of a strong legal framework and mechanisms to report hate speech occurrences, hate speech is often underreported. In the Netherlands, for example, the Dutch Criminal Law, in Art. 137(d), does not allow any form of hate speech. However, in practice, hate speech remains “underreported, despite continuing efforts” (de Swert et al., 2024).

7. GENERAL RANKING

Starting with the implementation of the MPM2022, the CMPF has introduced the general ranking of the countries, as an additional element of transparency. As the MPM has been described as a tool that measures the “temperature” of the risks to media pluralism in a given country, this general ranking, which calculates an overall average score for each Member State, aims to provide a mapping that can be interpreted as a preliminary triage for the risks to media pluralism in a country, while the causes of the “illness” must be explored with the help of the details given in the analysis of the four areas.

The general scores of the countries are calculated as a simple average of the four area scores of the MPM. In order to visually explore the differences between the scores of the countries, the CMPF has experimented with several types of visualisations for this general ranking. The first visualisation proposed is a regular bar chart providing a simple general ranking with the risk level associated with each country in ascending order.

Figure 7.a. MPM2024 - General ranking

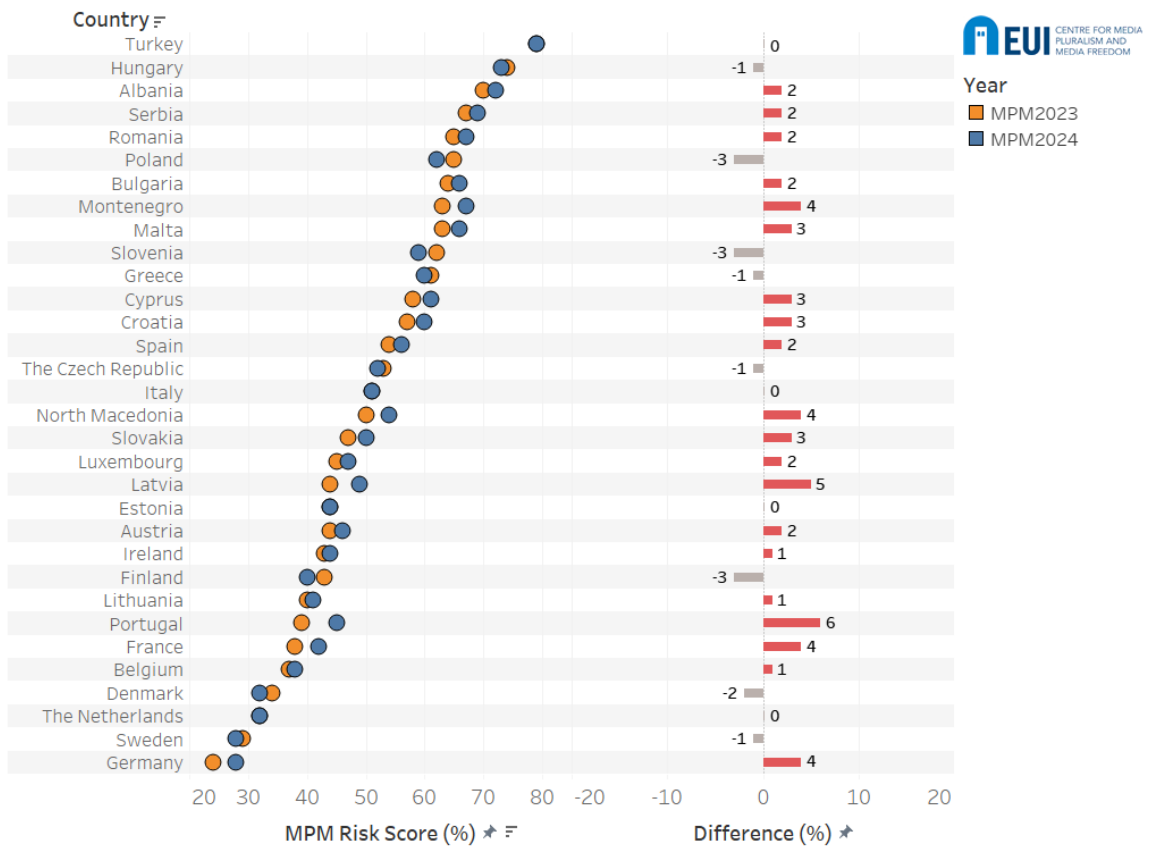


Compared to the previous implementation of the MPM, the general ranking (see Figure 7.a.) shows relative stability regarding the countries that are associated with a lower-risk level. The five lowest scoring countries still include Germany (28%), Sweden (28%), the Netherlands (32%), Denmark (32%), and Belgium (38%). The risk level associated with Germany, the country scoring the lowest risk the previous year, has increased by four percentage points (see Figure 7.b. below). The increment of the risk for Germany is linked to substantial increases of risk in all the MPM areas (including relevant increas-

es for the indicators on Media Viability and Editorial independence from commercial and owners influence), except in the Political Independence area (one point decrease). Finland gained three positions in comparison to MPM2023, reaching 6th place in the ranking. This is due to a slightly better assessment in all the areas, particularly in Market Plurality and Social Inclusiveness, except for Political Independence, which increased by 1%, from 32 to 33%. At the opposite end of the bar chart, Turkey (79%) confirms the risk assessment and the highest risk-scoring country position of MPM2023, followed by Hungary (73%), Albania (72%), Serbia (69%), and Romania (67%).

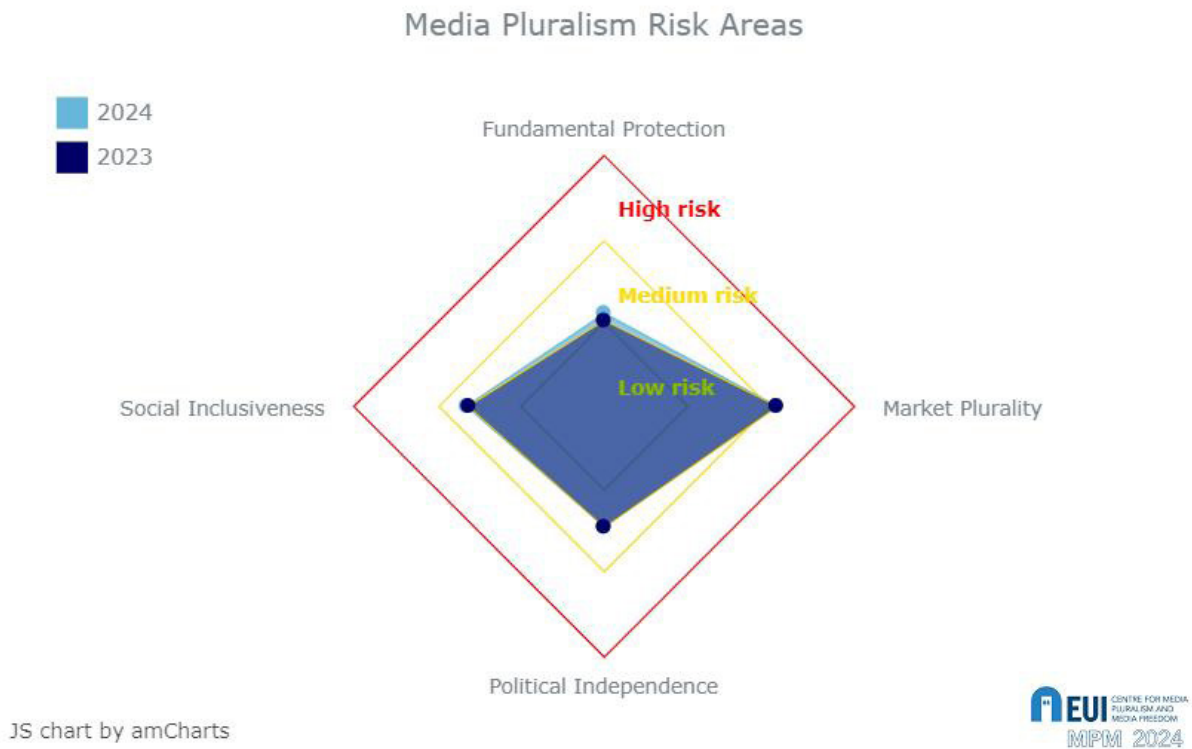
17 countries are associated with an “average” risk value between 40% and 60%. At the centre of the ranking is the Czech Republic with a risk score of 52%, which is close to the mean score (52,5%) among all the examined countries. In MPM2023, Italy was in this position with a score of 51%, which means that, in MPM2024, the average risk has slightly increased.

Figure 7.b. Comparison of MPM2023 and MPM2024 rankings



In general, based on the average per area, slightly higher scores than in MPM2023 are detected in the **Fundamental Protection** area (from 34% of MPM2023 to 37% of MPM2024) and in **Social Inclusiveness** (from 54% to 55%).

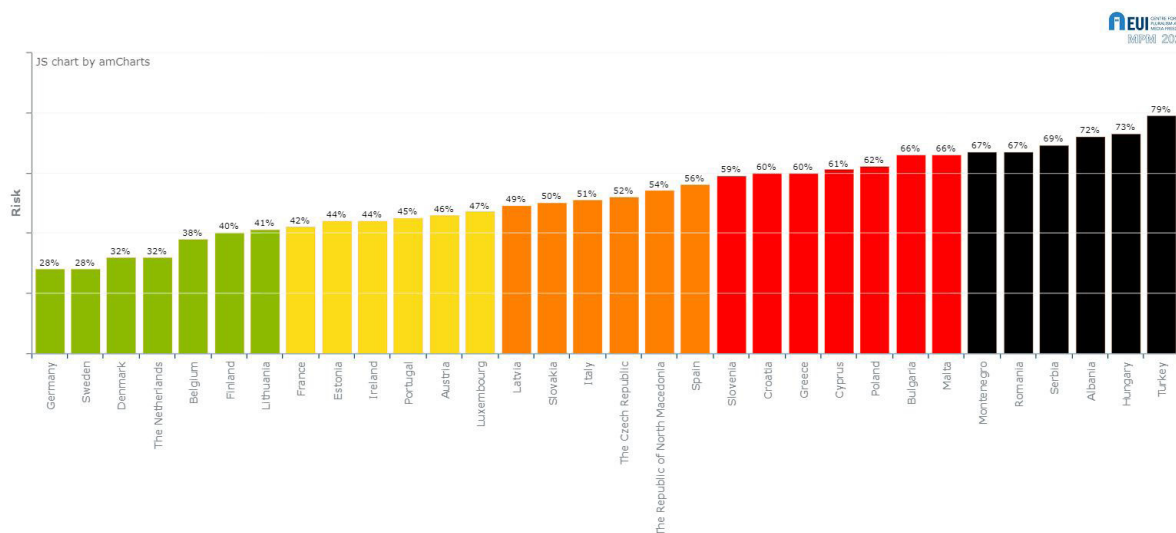
Figure 7.c. MPM2024 - Average score by area in MPM2023 and in MPM2024



As in MPM2023, another bar chart proposes a new representation of the countries in a comparative classification, according to a quintile ordering. In MPM2024, the countries examined are 32 and in chart 7.d. they are categorised in five clusters of (almost) equal numerosity. The five clusters can be conventionally interpreted, in a classification based on their relative risk scores, as the first at very low risk; the second at low risk; the third at medium-risk; the fourth at high risk; and the fifth at very high risk.

It is important to underscore that this way of comparatively clustering the countries is derived from the result of a simple arithmetic averaging of the scores per area and differs from the usual conventions of the MPM. In other words, this ordering in five groups does not follow directly from the structures of the questionnaire and the data collection, based on a choice between three levels of risk for each question posed, but simply from their mathematical averaging across the whole monitor.

Figure 7.d. MPM2024 - General ranking by quintile classification



The quintile classification of the general ranking provides the following result:

- The first quintile (up to 41,2%), coloured green, is composed of the seven countries associated with a relatively lower risk level:

Germany	28
Sweden	28
Denmark	32
the Netherlands	32
Belgium	38
Finland	40
Lithuania	41

The second quintile (up to 47,8), coloured yellow, is composed of six countries scoring an average risk between 42% and 47%:

France	42
Estonia	44
Ireland	44
Portugal	45
Austria	46
Luxembourg	47

The difference in risk level between these countries is quite contained.

- The third quintile (up to 57,8%), coloured orange, is composed of six countries, scoring between 47% and 56%:

Latvia	49
Slovakia	50
Italy	51
the Czech Republic	52
the Republic of North Macedonia	54
Spain	56

- The fourth quintile (up to 66%), coloured red, is composed of seven countries, associated with a higher risk level between 59% and 66%:

Slovenia	59
Croatia	60
Greece	60
Cyprus	61
Poland	62
Bulgaria	66
Malta	66

All these countries scored clearly above the median and the average risk level.

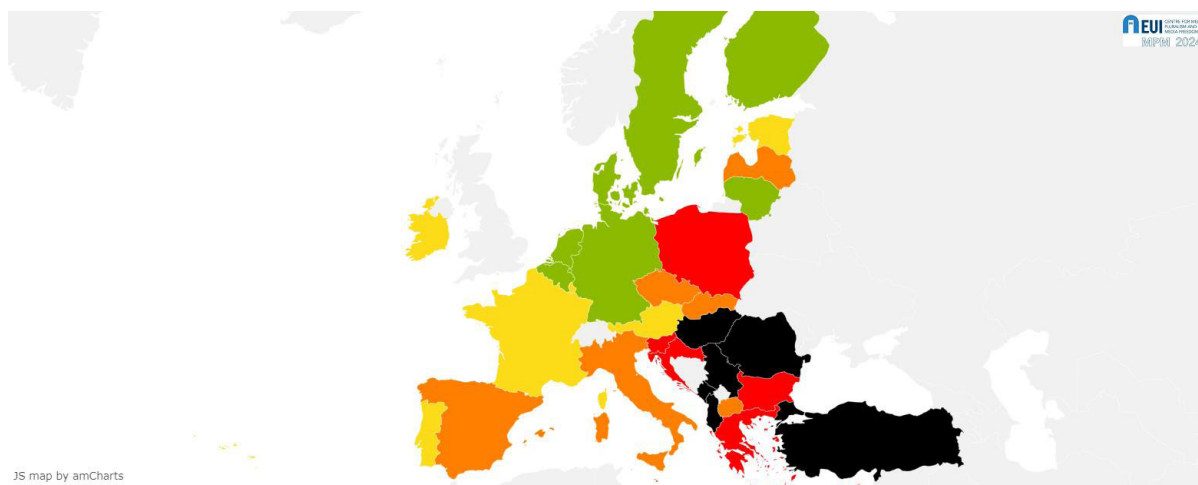
- The fifth quintile (up to 79%), coloured black, is composed of the six countries associated with the relative highest risk in the MPM2024.

Montenegro	67
Romania	67
Serbia	69
Albania	72
Hungary	73
Turkey	79

It is interesting to notice that this quintile is composed of four candidate countries (Albania, Serbia, Montenegro, and Turkey) and two Member States integrated in the last three waves of enlargement of the EU (Hungary and Romania).

Finally, in Figure 7.e., the same quintile representation of the previous bar chart is shown in map form, proposing a representation of the ordering in order to better appreciate the geographical location of the relative risks.

Figure 7.e. MPM2024 - General ranking - map of the countries per quintile classification



As a trend, looking at the map, Member States generally classified as “North-Central Europe or Corporatist models”, in the framework of Hallin-Mancini (2004), are those that are overall performing well (always relatively to the other countries); followed by countries in the “Mediterranean or Pluralised Pluralist Model”, such as France, Portugal, and less Italy, which show risks below or around the median. The latest round of accession countries and candidate countries are often given risks above the median. Still, some notable exceptions are the Baltic countries, and Slovakia, which score close to or clearly below the median risk.

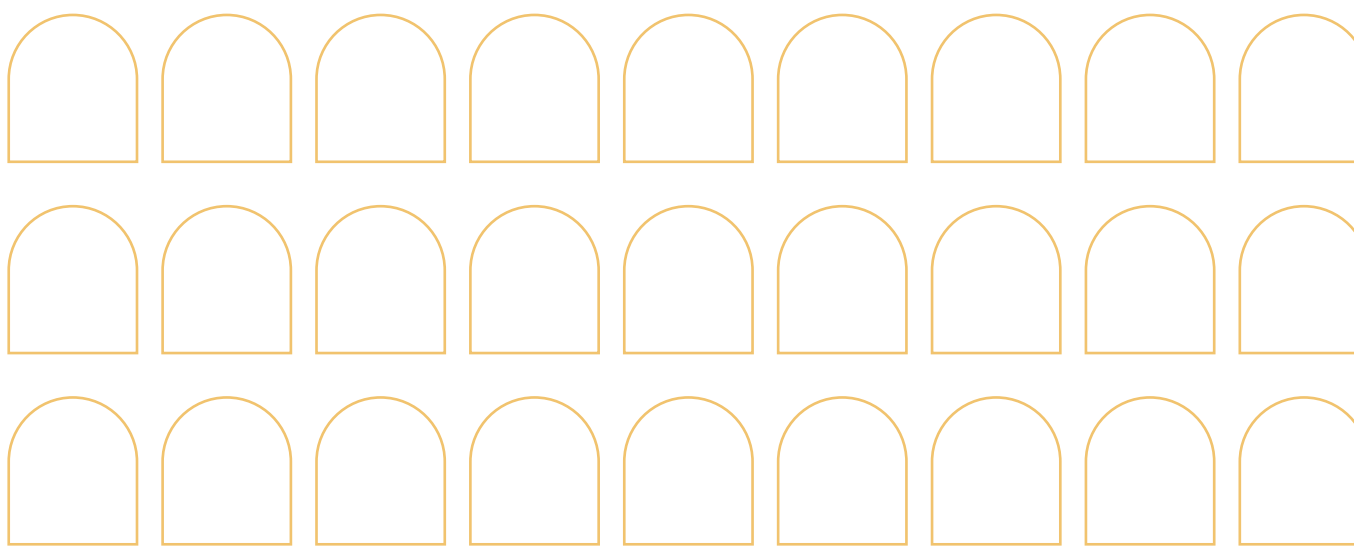
In order to avoid misinterpretations of this comparative ranking, it must be stressed, once again, that the MPM is a tool that assesses the risks to media pluralism, based on an analysis that takes into account structural elements that may, or may not, be considered problematic, in order to ensure a pluralistic media environment.

The focus of the MPM is not just on finding out what the deficiencies of a media system are, but also on whether there are structural conditions that can lead to a deterioration in the state of freedom of expression and media pluralism in a given context. The rationale behind the Media Pluralism Monitor is that it is “a systematic analytical process, based on predetermined risk criteria, professional judgement and experience, to determine the probability that an adverse condition will occur” (EC Working Document, 2007). The analysis is based on data that are indicators of the state of media freedom and pluralism with regard to both the conditions that are conducive to more or less media freedom and pluralism, and how these conditions are implemented in practice.

It is worth highlighting too, once again, that the MPM analysis covers the year preceding the year of publication, so, in the case of the current report, the year 2023. Events occurring in 2024, or the consequences of reforms in the media sector that have been announced and not implemented, are not considered yet.

It must also be emphasised that the Media Pluralism Monitor is a tool that has been conceived to be implemented in the Member States of the European Union and candidate countries. The general rankings of the scores, which for the year 2023 range from 28 in Germany and Sweden to 79 in Turkey, are relative to only 32 countries, and are based on standards that are common to the constitutional traditions of EU Member States, rules that are part of the *acquis communautaire*, and standards that have been developed by the Council of Europe.

The percentages of risk resulting from the MPM exercise, and especially the final averaging exercise that produces the general ranking, must thus be read strictly in this relative and reasonably comparable context. Any attempt at comparison of the ranking proposed by the Media Pluralism Monitor with other rankings, like the rankings produced by renowned NGOs on more diverse or variegated standards, should be exercised with extreme caution. For instance, the Reporters without Borders' World Press Freedom Index covers almost all the countries on the globe, and focuses on freedom of expression and the safety of journalists, using a different methodology, as well as its own set of indicators and scopes. Consequently, there is no straightforward score-scale comparability with the results of the MPM for the EU and candidate countries.



8. CONCLUSIONS AND RECOMMENDATIONS

8.1 Fundamental Protection

Freedom of expression enjoys satisfactory levels of protection *de jure*, with constitutional and legal safeguards aligned with the existing international standards. However, the implementation and enforcement of these safeguards remain poor in some of the countries assessed. The key issues in 2023 (MPM2024) include the criminalisation of defamation (term of imprisonment or high amounts of fines, which represent disproportionate measures, and which have a chilling effect on journalists) and the use of strategic lawsuits against public participation (SLAPPs). In the online sphere, both public and non-public actors have an important role in ensuring that the freedom of expression is not undermined. Concerning public actors, most of the countries assessed do not limit freedom of expression online through general blocking or filtering measures. However, the MPM analysis has once again confirmed that content moderation is disquieting, as online platforms are not sufficiently transparent about their practices and do not provide disaggregated data that would allow for a full assessment of their practices in relation to the filtering/removal/blocking of online content, and national laws do not provide for such transparency. The issue appeared to be particularly pronounced in Baltic countries, where blocks and removals related to Russian propaganda and information on the war in Ukraine are more common.

The main challenges for the indicator **Protection of the right to information** continue relating to the comprehensiveness and effectiveness of Freedom of Information rights. As often reiterated by previous MPM reports, the existence of a law or constitutional provision dealing with the right to information and/or freedom of information does not guarantee that these rules will be effectively applied. Some of the countries researched in this report, such as Malta, Latvia, and Poland, refer to unjustified refusals or delays regarding FOI requests. Moreover, though almost all EU Member States have transposed the EU Whistleblowing Directive, national legislation may fail to establish adequate safeguards for individuals who approach the media. In addition, a frequent concern raised by country

researchers is the lack of general awareness initiatives developed by national governments regarding the protection available to whistleblowers or their exposure to pressure and retaliation, which often leads to refraining from reporting.

The indicator **Journalistic profession, standards and protection** scored an average risk, at 43%, which is the same as its score in the MPM2023. It constitutes the indicator at the highest risk within the Fundamental Protection area.

Poor working conditions for journalists, threats to their physical and online safety, and the rise of strategic lawsuits against public participation (SLAPPs) remain key problems requiring systematic solutions, in 2023 as well. In many of the countries assessed, it is a common practice to force journalists to become self-employed persons or to establish one-person companies in order to be able to work as “external collaborators” for media outlets, which leaves them very vulnerable due to limited access to unemployment benefits, paid maternity, and parental or sick leave, and the possibility to terminate their contracts *ad hoc*. This is particularly true for journalists working for local and regional media. With regard to journalists’ safety, attacks in the online environment have risen continuously. Physical attacks also persist, often as a consequence of online threats or intimidation shared in public by political actors. Arrests of journalists took place, especially in Spain, the Netherlands and Turkey. The issue of surveillance of journalists through intrusive spyware software also emerged as an issue.

In 2023, no journalist was killed in any of the EU Member States or in the candidate countries, but the French AFP journalist Arman Soldin was killed in Ukraine. Journalistic associations in some of the countries assessed do not enjoy popularity among journalists and, therefore, with only a few members, they have limited influence on the profession and its standards and direction in the country. The low popularity of journalistic associations makes bargaining for better working conditions more difficult and more fragmented.

This indicator also shows that some EU Member States still have national laws that establish data retention obligations for Electronic Telecommunications Operators and Internet Service Providers, which are not fully in line with the guidance provided by the Court of Justice of the EU. Similarly, a few Member States still need to ensure a proper balance between data protection and freedom of expression through the proper implementation of the GDPR in terms of preventing the illegal monitoring of journalists. In this regard, it is expected that the EMFA provision on the rights of media service providers will reinforce the protection of journalists insofar as Member States will have to ensure that journalistic confidential communications and sources are effectively protected against the deployment of intrusive surveillance software (Article 4 (c) Regulation (EU) 2024/1083).

In an environment that is continuously being altered by digital transformation as well as threatened by AI-related innovation, the role of national media regulatory authorities becomes paramount to defining the standards for media policies. It is indeed crucial that these regulators remain impartial in their board appointments to uphold their independence. Despite efforts such as the AVMSD to establish clearer criteria for ensuring independence, some countries still struggle to meet these standards. The indicator **Independence and effectiveness of the media authority** confirms this challenge. While in terms of adequacy of their remit, most countries fall within the low-risk band, some authorities can use their competences to stifle critical voices, as observed in Turkey. Budgetary pressures from ruling governments also pose a significant hurdle.

Additionally, we must acknowledge the emergence of two new European boards affecting the media sector. The DSA is establishing a new governing body, namely the European Board for Digital Services (EBDS), which is formed by national regulators, known as Digital Services Coordinators, who are responsible for implementing and enforcing the DSA (Art. 61 DSA). Under the EMFA, the European Board for Media Services (EBMS) will effectively replace the European Regulators' Group for Audiovisual Media Services (ERGA) (Arts. 8 - 16 EMFA). How these two levels of governance for issues that are relevant for media regulation will be coordinated is another relevant development to keep in mind. The designation of these authorities may also raise, among others, questions about competence overlap and uniform application across the EU.

The aggregate risk score for the indicator **Universal reach of traditional media and access to the Internet** was 41% in MPM2024. On the whole, for the countries under assessment, the percentage of broadband coverage and internet access increased from the previous year. While universal coverage of the PSM is legally guaranteed in every country comprising the MPM, in practice, several countries still fall short in this regard. The situation regarding net neutrality remains more or less consistent with the results of MPM2023, with most countries falling into the low-risk band. However, the lack of recent market share data for internet service providers in Denmark, Latvia, Slovakia, and the Czech Republic made it difficult to timely assess the situation in these countries.

In light of the conclusions that have been reached based on the MPM data collection, the following **recommendations** are proposed in order to improve the media environment in both the EU and in Europe more generally, paying due attention to media freedom and pluralism, as pillars of democracy.

Protection of freedom of expression

- To the European Union, each state, Digital Service Coordinators and online platforms: to ensure transparency and access to data from online platforms regarding the filtering/removal/blocking of online content, in line with the related provisions in the European Digital Services Act (among others, articles 15, 17, 27, 40 and 42).

- To the European Union: to ensure that the implementation of Articles 34 and 35 of the DSA undergoes independent ex-post analysis, funded by the supervisory fee collected under Article 43 of the DSA, in order to assess the impact of risk assessment and risk mitigation measures on media freedom and media pluralism.
- To very large online platforms (VLOPs), media services and media authorities to implement Art. 18 of the European Media Freedom Act in compliance with the rationale of the article that is to safeguard the quality of media services.
- To the states: to promote the decriminalisation of defamation.
- To the state and the judiciary: to implement the existing legal guarantees for freedom of the press and freedom of expression effectively.

Protection of the right to information

- To the state and public authorities: to ensure the proper application and/or to strengthen the laws on access to information, bridging the gap between *de jure* and *de facto* right to information in order to avoid unjustified refusals or delays on FOI requests.
- To the state and public authorities: to ensure the adequate transposition and implementation of the EU Whistleblowing Directive (Directive (EU) 2019/1937) or similar regulatory guarantees in non-EU countries, avoiding gaps.
- To the state, public authorities, civil society and the media: to raise public awareness about the available protection for whistleblowers and to contribute to positive public attitudes towards them.

Journalistic profession, standards, and protection

- To the state and public authorities: to improve the working conditions of journalists by the adoption of legal frameworks that allow for better labour conditions in the sector. This would include extending the public social protection schemes to all persons who practise professional journalism (whether they are regularly employed or freelancers) and incentivising collective bargaining to introduce new kinds of economic protection against market downturns.
- To media companies and newsrooms: to ensure decent working conditions for their employees, e.g. avoid forcing journalists to become self-employed even though the nature of their collaboration mimics standard full-time employment contracts.
- To the state and public authorities: to promote the safety of journalists by raising awareness among state institutions (e.g., the judiciary and the police) about the importance of the media for democracy, and by avoiding unjustified arrests and

impunity for crimes that are linked to journalism.

- To the state, public authorities and the media: to encourage collaboration between the state and the media in ensuring the safety of journalists, e.g., to organise training on how to behave while covering protests or other high-risk events; to encourage journalists to denounce the intimidation and attacks received as a consequence of their job; to set systematic monitoring systems of SLAPPs and other forms of attacks against journalists, with particular attention to the gender dimension of these threats.
- To the state and public authorities: to condemn the political elite's attacks on journalists.
- To the state and public authorities: to implement the European Commission's Recommendation C(2021) 6650 "on ensuring the protection, safety and empowerment of journalists and other media professionals in the European Union".
- To the state and public authorities: to promote the implementation of an effective anti-SLAPP legal framework that is able to prevent arbitrary and unlawful attempts to silence legitimate professional journalistic and civil society activities, including allowing judges to expeditiously dismiss unfounded lawsuits that are brought against journalists and human rights defenders. The principles and practices enshrined in the 2024 EU anti-SLAPP directive for cross-border vexatious lawsuits and in the Council of Europe's Recommendation CM/Rec(2024)2 "on countering the use of strategic lawsuits against public participation (SLAPPs)" should be taken into utmost account also in the internal legal order.
- To the state, public authorities and private companies: to avoid the use of spyware and other intrusive surveillance technologies on journalists and other public watchdogs, even beyond the limitations set by Art. 4 EMFA.
- To journalistic associations and media councils: to make sure that journalists abide by the highest professional standards in reporting.

Independence and effectiveness of the media authority

- To the state and public authorities: to ensure and reinforce the independence of media authorities by establishing clear rules for appointment procedures, appropriate funding and accountability mechanisms, especially in view of the new tasks and roles attributed to them by the Digital Services Act (DSA) and the European Media Freedom Act (EMFA).
- To the state and public authorities: to promote and enhance the cooperation between media authorities and other state authorities whose actions are relevant to the media sector (such as data protection authorities) and, importantly, between the forthcom-

ing European Board of Digital Services under the DSA and the European Board of Media Services under EMFA, particularly when dealing with media content online, as not all the media authorities are appointed as digital services coordinators and, thus, there is a risk of regulatory fragmentation.

- To the states: to provide adequate resources to the members of the European Board of Digital Services—the Digital Services Coordinators (DSCs)—as they play a crucial role in the overall framework of systemic risk assessment and mitigation oversight (Art. 34-35 DSA).

Universal reach of traditional media and access to the Internet

- To the state and public authorities: to make ISP market share data publicly available. The transparency regarding how ISPs manage network traffic could also be improved.

8.2 Market Plurality

The Market Plurality area scores at high risk in MPM2024, as it was in last year's implementation. Once again, the economic threats to media pluralism emerge as widespread across the European Union and the candidate countries. In this area, no country is at low risk and there is a relative homogeneity, mainly due to the results of the numeric variables. The economic indexes signal a high concentration in media ownership, and an even higher concentration in the digital environment, when not only the media service providers but also the information intermediaries are considered. Differences in the legal framework and self-regulation explain the final ranking in this area, with 13 countries scoring at medium-risk, and 19 countries at high risk.

The main challenges for **Transparency of media ownership** are related to the lack of media-specific rules on ownership disclosure, the differences across countries on the availability and accessibility of updated information on beneficial owners, and the lack of media ownership rules for the digital sector. Even though the existence of general rules on transparency of overall economic activities, and/or habits of disclosure by the media outlets themselves, might guarantee transparency of media ownership in practice, reinforced and specific legal safeguards should be applied to the media sector to ensure full disclosure up to the ultimate owners, and accessibility to that information by the public and by the public bodies. The future implementation of the new transparency provisions of Regulation (EU) 2024/1083 (European Media Freedom Act) will probably change this scenario, as the information will be stored in national media ownership databases to be created by Member States (Art. 6(2) EMFA). The provisions require media providers to make information easily and directly accessible, for instance, on

their direct or indirect owners with shareholdings enabling them to exercise influence on the operation and strategic decision-making, including direct or indirect ownership by a state or by a public authority or entity, and information of their beneficial owners.

Plurality of media providers is menaced by old and new tendencies towards concentration. The evolution of the media in the digital environment did not reduce, but if anything increased, the tendency to bigness, motivated in more recent times by the need to compete with the new players who do not provide media content but compete with the media for the public's attention and in the advertising market. In spite of a fine-tuning of the MPM measurement of concentration levels, motivated by the evolution of the media markets, the risk score for this indicator did not improve substantially. The offer of digital media is slightly less concentrated, but still at high risk; in addition, the lack of reliable data on digital sector revenues and the lack of a standardised method of audience measurement complicate the assessment. The legal framework is fragmented at the national level, and it often lacks media-specific rules to prevent the concentration of media ownership, or to mitigate its potential negative effects on media diversity.

Plurality in digital markets scores at the highest risk level across the 20 indicators in MPM. This result is due both to the economic and the legal variables. In the economic dimension, where available, indexes of revenue concentration in the online advertising market are very high, with two players — Google and Meta — gathering 60-70% of revenue. In parallel, indexes of audience concentration, which would be a proxy of market power in the attention markets, are rarely available, and hardly comparable. When it comes to the legal framework, this indicator registered the evolution, in some countries, of the competition and regulatory intervention; the difficult economic relationships between platforms and publishers, in terms of remuneration of media content by the digital intermediaries; and progress in the field of taxation (until now mainly on paper), with the minimum tax on profits of large companies.

Media viability scores medium-risk. For years, news media have been suffering from the decreasing viability of the market. By 2023, the positive effects of the post-COVID rebound were waning, while high inflation in most EU Member States and candidate countries, as well as Russia's invasion of Ukraine, increased the costs of operating news media, and decreased real revenue. In cases when forecasts or assessments of the market year 2023 were available, some improvements in the economic performance of the audiovisual sector were detectable, but the related variable was still at medium-risk. Newspapers and local media are especially vulnerable. The lack of official data is also a problem; for example, a reliable assessment of the viability of digital news media is not possible, due to a lack of disaggregated digital market data. In the case of journalistic employment and the working conditions of freelancers, the deterioration, while somewhat slower, is still ongoing. Many governments understand that subsidies can be pivotal under current economic conditions, still, the support schemes are in most cases limited.

Editorial independence from commercial and owners influence has shifted to high risk, for the first time in the history of the MPM. It shows that in a vulnerable media environment, newsrooms and media workers are increasingly under pressure from commercial interests, be those of their owners or of their advertisers. As many media entrepreneurs are involved in sectors outside of the media, which can benefit from good press coverage or the goodwill of certain politicians, there is a need for formal protections to uphold the integrity of the profession and the content published, as well as measures that ensure increased transparency on conflicts of interest, but in many cases these safeguards do not exist or are weakly enforced.

Recommendations

As many of the risks assessed in the **Market Plurality** area are addressed by the European Media Freedom Act, entered into force in April 2024, the recommendations take into consideration the improvements that can be derived from a rapid and effective implementation of the law in all the EU countries (and by a process of adaptation in the candidate countries), and add proposals that go beyond the EMFA, to complement the new law, strengthen its effectiveness, and address some potential shortcomings. It must be noted that, while the Regulation will apply from 8 August 2025, the general provision set in Art. 3 (stating the fundamental right of recipients of media services to have access to pluralistic and independent information) shall apply from 8 November 2024; whereas Art. 6(3), regulating the duty of media service providers providing news and current affairs content to guarantee editorial independence of the newsrooms, and disclose actual or potential conflict of interests, will apply from 8 February 2025.

Transparency of media ownership

- To the European Commission, and the new European Board for Media Services: creation of a European registry of media ownership, or standardisation of the registries at the national level to enhance interoperability.
- To the states and national regulators: prepare the implementation of Article 6(2) *EMFA by creating national databases that collect information; these databases should be open to the public*. Include in the transparency obligations the publication of annual financial reports by the media companies. Obligations of transparency should be strengthened for media receiving public support.
- To the media service providers: make easily and directly accessible to the recipients of their services complete and updated information on their ownership structure, including direct and indirect owners, up to the beneficial owner, as well as information on the total annual amount of public funds for state advertising allocated to them and the total annual amount of advertising revenues received from third-country public authorities or entities.

Plurality of media providers

- To the European Commission and the new European Board for Media Services: set precise and detailed guidelines on the criteria to assess media market concentrations, specifically in case of mergers involving or impacting the media. 1) measurement of opinion power in the online environment should take into consideration the existence of a potential plurality of offer, but also its accessibility and effective access, based on media consumption habits; 2) links or activities of prospective media owners in non-media business should be considered as a possible reason to block the merger, in cases in which the resulting entity would not receive the majority of its revenue from media business; 3) consider among the safeguards for editorial independence in the case of mergers and acquisitions the journalists' approval of the merger.
- To the European Parliament and the European Commission: complement the new rules on media merger assessment with a mechanism to monitor media market concentration on a regular basis; and to intervene in cases in which a position of market power emerges that could have a significant impact on media pluralism.
- To the states and the regulators: apply Art. 22 of the EMFA, introducing rules to assess the impact of media market concentration on pluralism; strengthen the independence of the national authorities or bodies responsible for this assessment; introduce audit of civil society organisations in the assessment of media mergers which could impact pluralism. Use public support for the media to incentivize plurality and diversity of media service providers.

Plurality in digital markets

To the European Commission and the states:

- use the tools of the new EU digital regulation, starting with the data sharing obligations set by the DMA, to intervene in the online advertising market;

- use the part of the revenue deriving from the implementation of the global minimum tax to create a fund to finance independent and quality media and journalists.

To the European Commission, the states, the regulators, the media industry and very large online platforms (VLOPs):

- cooperate to harmonise and standardise audience measurement systems. In respect of the protection of personal data and of commercial interests, guarantee open access to the results of audience measurements;
- guarantee transparency in the negotiation process for a fair remuneration of the use of media content; incentivize the inclusion of all the media in the agreements between mainstream media and platforms, or the association of smaller independent media to negotiate with the platforms;
- monitor and report transparently the results of negotiations on the use of media content to train systems of Generative AI.

Media viability

- To the states: the strengthening of media support schemes, with a focus on innovation and the fostering of long-term sustainability.
- To the states, the regulators and the industry: favour the access to reliable data on advertising and revenue trends, and employment trends (and the conditions of freelance journalists). All relevant stakeholders should enable an environment in which such important information is available, to make it possible to better diagnose the financial health of the media system (and to help propose appropriate solutions).
- To the media outlets and journalists' associations: in accordance with the Commission Recommendation (EU) 2022/1634, facilitate the sharing of best practices in order to allow news media outlets to become more resilient to economic challenges, as well as to remain appealing to a wide audience. Examples include new business models, new ways of engaging with audiences, and new corporate governance structures giving journalists greater control over the organisation they are working for.

Editorial independence from commercial and owner influence

- To the states: strengthen protections of journalists and independent newsrooms from commercial and owner influence, especially when it comes to cases of changes in the editorial line (e.g. with conscience clauses).

- To the states and the media regulators: while disguised advertising is mostly regulated in the countries assessed, more attention needs to be paid to new formats that are blurring the boundaries between editorial and commercial content.
- To the media service providers and the journalistic associations: put in place measures and mechanisms to protect the editorial independence of the newsrooms, implementing Commission Recommendation (EU) 2022/1634. In the current, vulnerable media environment, self-regulation needs to pay more attention to the influence of commercial entities over media content. Self-regulation should address the problems related to journalists' involvement in advertising-related activities and emphasise the effective separation between the editorial and commercial activities of newsrooms. Newsrooms should inform audiences about potential conflicts of interest (be it owners' involvement in specific businesses or funding received from third parties).

8.3 Political Independence

The risk for the **Political Independence** area remains in line with the most recent implementations of the MPM (48%, medium-risk). Although the area was not subjected to significant risk fluctuations, this result confirms the significant degree of politicisation of the media across the European Union and candidate countries. Central and Southeastern Europe continues to represent the region where symptoms of media capture are most evident, with a large number of countries presenting high or upper-medium-risk scores. While at a lower intensity, or only in some of the specific subfields investigated, Western Europe also presents significant evidence of political control.

Political control often manifests as an interrelation of risk components, which has the ultimate effect of degrading the autonomy of media and journalists. As already identified across the report, the increased concerns in the indicator of **Political independence of the media** proved—once again—that the mutually corrupting relationship between political actors, media owners, and editors-in-chief, cannot be easily relinquished. The biased distribution of state resources, and particularly of state advertising, has to be contextualised in such a concerning configuration. In the public sphere, the grip that political parties continue to show on the governance structures and funding mechanisms of the PSM across Europe is identified by the indicator **Independence of public service media**, which was subjected to a risk increase. All these factors combine in a deleterious mix, which has an acute impact on **Editorial autonomy**, which is the worst scoring indicator within the area.

Across the dimensions investigated in the area's digital environment, political advertising online represents the major challenge. At the same time, significant risks are detected when it comes to ownership control in the digital environment, as well as when looking at the risks of competition distortion of the online public service missions of the PSM. The recent approval of the European Media Freedom Act introduced novel tools and safeguards for media freedom at the European level, including a Commission Recommendation on internal safeguards for editorial independence and ownership transparency in the media sector. The adopted regulation will provide a new supranational basis for addressing the persistence of political control over European media, both in the private and public sphere.

Recommendations

Political independence of the media

- To the states and to the public authorities: where available, to implement thoroughly the rules against conflict of interest and/or direct and indirect political control, in order to prevent or quickly resolve cases of concern. Where these regulatory safeguards are missing, they should be put in place with urgency, accounting for the specificity of the national media industry, as well as the digital environment. Consideration of the local media reality is also paramount.
- To the media regulators: as requested by EMFA Art. 6(2), regulatory authorities should develop national media ownership databases containing ownership information, up to the beneficial owner.
- To the media: to carefully implement the duties set out by Art. 6 of the adopted European Media Freedom Act, making easily and directly accessible up-to-date information on direct and indirect owners with shareholdings, including direct or indirect ownership by a state, a public authority, or entity, and information on beneficial ownership.

Editorial autonomy

- To the media: to implement the duty provided by Art. 6(3) of the European Media Freedom Act of guaranteeing editorial independence of the newsrooms, and disclosing any actual or potential conflict of interest. This duty should be implemented well before the date from which it will apply (8 February 2025), taking into account the Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector.

- To the states and active political actors: to stop exerting direct and/or indirect pressures that might have direct and/or indirect consequences over the editorial autonomy of news media.
- To the journalistic associations, civil society, and the media: to strengthen cooperation and mutual support, in order to reinforce self-regulatory instruments. Safeguards need to be strengthened in order to impede the appointments and dismissals of editors-in-chief on a political basis.

Audiovisual media, online platforms and elections

- To the states: in terms of representation of political actors and viewpoints, legislation should be updated in order to meet the challenges posed by the online environment. The body entitled with the monitoring of political pluralism during the electoral and non-electoral periods should be provided with the necessary resources for carrying out such monitoring; the mechanism of providing funding for these activities should be free from political considerations. Commercial audiovisual media should be covered by such monitoring.
- To the states and the public authorities: in line with the Recommendation of the Council of Europe (CM/Rec(2022)12), the Digital Services Act (Regulation (EU) 2022/2065), the recently approved Regulation on the Targeting and Transparency of Political Advertising, and self-regulatory frameworks, such as the Code of Practice on Disinformation (2022), the states should increase their efforts to ensure the transparency of political advertising online.
- To the political parties and candidates: to be transparent on the expenditure and the techniques used during electoral campaigns, both in the traditional and the online realm.
- To the Data Protection Authorities: to strengthen any effort necessary to prevent, address, and disclose the misuse of personal data for political campaign purposes.

State regulation of resources and support to the media sector

- To the states: it is paramount that state subsidies—direct and indirect—are set up and distributed fairly and transparently, according to clear criteria.
- To the states: as required by Art. 25 of the European Media Freedom Act, state advertising shall be awarded in accordance with transparent, objective, proportionate and non-discriminatory criteria, made publicly available in advance by electronic and user-friendly means, and by means of open, proportionate and non-discriminatory procedures. Member States shall seek to ensure that the overall yearly public

expenditure allocated for state advertising is distributed to a wide plurality of media service providers represented on the market, taking into account the national and local specificities of the media markets concerned.

- To the media regulators: as defined in Art. 25 of the European Media Freedom Act, national regulatory authorities or bodies, or other competent independent authorities or bodies in the Member States shall monitor and report annually on the allocation of state advertising expenditure to media service providers and providers of online platforms based on the information listed in paragraph two. Those annual reports shall be made publicly available in an easily accessible manner. Where the monitoring, assessment and reporting are carried out by other competent independent authorities or bodies in the Member States, they shall keep the national regulatory authorities or bodies duly informed.
- To the media: as required by Art. 6 (1)(d) of the European Media Freedom Act, to make easily and directly accessible to the recipients of their services complete and up-to-date information on the total annual amount of public funds for state advertising allocated to them and the total annual amount of advertising revenues received from third-country public authorities or entities.

Independence of public service media governance and funding

- To the states: Public service media, as far as it upholds independence, universality, diversity, innovation and accountability, plays a crucial role in both the traditional and the digital environment by providing unbiased, high-quality information that strengthens democracy and fosters an informed citizenry. As defined by Art. 5 of the European Media Freedom Act, Member States shall ensure the editorial and functional independence of public service media providers. Procedures for the appointment and the dismissal of the top-management shall be transparent, open, effective and non-discriminatory. Criteria shall be transparent, objective, non-discriminatory and proportionate, and laid down in advance. The duration of their term of office shall also be adequate for effective independence. Decisions on dismissal before the end of the term of office shall be duly justified, and may be taken only exceptionally. They shall be subjected to prior notification to the persons concerned and shall include the possibility of judicial review. Also, for funding procedures, criteria shall be transparent, objective, and laid down in advance. Funding procedures shall guarantee adequate, sustainable and predictable financial resources, and aimed at the safeguarding of editorial independence. They should envisage a mechanism that is not subject to shifting majority decisions and, more in general, to government's interference. Member States shall designate one or more independent authorities or bodies, or put in place mechanisms free from political influence by governments to monitor the application. The results of that monitoring shall be made available to the public.

8.4 Social Inclusiveness

The medium-risk level associated with **Social Inclusiveness** illustrates deeply ingrained issues in terms of the representation of minorities and women in the media, as well as emerging challenges to maintain a safe and accessible media environment in the digital era.

The representation of women in the news is the main issue in the area, with systematic quantitative and qualitative biases. Moreover, in the absence of systematic monitoring, it is difficult to measure the extent of the problem and address the issue. The growing number of women in management positions, often encouraged by gender equality policies, still does not guarantee a fair and proportional representation of women in the news.

As far as **Local, regional and community media** are concerned, this new edition of the MPM has highlighted the existence of media deserts in many countries. Local media tend to struggle to be viable and the amounts of subsidies available to them are limited. Besides, in many countries, community media are still not recognised in media law as a category *per se*. This absence of a specific legal status may jeopardise their independence, as well as their sustainability.

In terms of the **Representation of minorities in the media**, many ethnic and religious minorities are struggling for a voice, and just for representation. As far as media accessibility for people with disabilities is concerned, the transposition of the AVMSD has contributed to strengthening existing legal provisions to ensure accessibility support for people with hearing and visual impairment. New AI tools have contributed to increased accessibility, however, provision of support for people with sight impairment is still limited.

Media literacy is still not part of the mandatory educational curriculum in some countries. Even when included, media literacy often remains problematic in practice. Education professionals are not necessarily trained in order to deliver media literacy training, and programmes are not necessarily up to date with current challenges. The situation is even more complex for vulnerable communities, which are often excluded from media literacy activities.

Similarly to last year, **Protection against disinformation and hate speech** is progressing in most of the countries considered. However, the fight against disinformation is often the sum of individual initiatives rather than the product of a concrete and comprehensive strategy. As far as Protection against hate speech is concerned, many online hate speech occurrences remain underreported.

Recommendations

Representation of minorities in the media

- To the public service media: to adopt a diversity charter promoting diversity among media staff and setting precise goals regarding the representation of minorities in the news.
- To the national governments and media regulators: to define some clear and mandatory quotas to fulfil regarding the amount of content accessible for people with disabilities (including subtitling, signing and audio descriptions).
- To media companies: to work in partnership with NGOs focusing on media accessibility for people with disabilities to develop tools that are adapted to their needs.

Local, regional and community media

- To the national governments: community media must be legally recognised, in order to guarantee their independence and their sustainability. The legal definition of community media should be adapted to the new forms of digital community media. When needed subsidies should be provided to ensure their viability.
- To the national governments: to provide strategies and financial support to prevent the emergence of news deserts.

Gender equality in the media

- To the national governments: a comprehensive gender equality policy should be included in public service media agreements. Such a policy needs to include parity within both management positions and newsrooms as well as measures to ensure a fair and proportionate representation of women in news content.
- To national media authorities: systematic monitoring measures of news media content should be implemented, in order to measure gender parity in the representation. The experience of the Finnish public broadcaster Yle is an example of good practices to replicate.

Media Literacy

- To national governments and civil society: media literacy policies should be updated to include current challenges linked to disinformation and AI. However, media literacy should not be reduced to digital literacy and must include news media literacy, following the comprehensive definition contained in Art.2(21) EMFA. *‘media literacy’ means skills, knowledge and understanding which allow citizens to use media effectively and safely and which are not limited to learning about tools and technologies but aim to equip citizens with the critical thinking skills required to exercise judgment, analyse complex realities and recognise the difference between opinion and fact.*
- To national governments: teachers must be provided with regular and adequate training on media literacy.
- To national governments: media literacy should be part of the mandatory school curriculum.

Protection against illegal and harmful speech

- To the EU: strengthen multi-stakeholder cooperation, with the involvement of media authorities, media service providers and civil society, in order to mitigate the harmful effects of disinformation, in a way that respects freedom of expression. Dialogue, resilience building, and the fostering of a healthy media environment must be encouraged and privileged over legal frameworks.
- To the European Commission: to make sure that the Code of Practice on Disinformation (CoP) becomes a Code of Conduct because, in relation to the systemic risk of disinformation, it is a fundamental instrument for implementing the risk mitigation system envisioned in the DSA (Art. 34-35).
- To national governments: to fully leverage the potential of the DSA and reduce hate speech, it is fundamental that the application of the DSA will be monitored and assessed periodically at the member state level.
- To national governments: police forces should be trained on aspects of online hate speech, and effective responses to provide for hate speech victims.

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ANNEXE - 1 METHODOLOGY

A.1 Research design

The MPM is a holistic tool that is designed to identify the potential risks to media pluralism in Member States, with a specific focus on news and current affairs. The research design of the MPM was developed and tested during the two pilot implementations of the Monitor, which were undertaken in 2014 and 2015. The Media Pluralism Monitor categorises risks to media pluralism in four main areas:

- **Fundamental Protection.** The Fundamental Protection area considers the necessary preconditions for media pluralism and freedom, namely, the existence of effective regulatory safeguards to protect the freedom of expression and the right to seek, receive and impart information; favourable conditions for the free and independent conduct of journalistic work; the presence of independent and effective media authorities, and the universal reach of both traditional media and access to the Internet.
- **Market Plurality.** The Market Plurality area considers the economic dimension of media pluralism, assessing the risks that are related to the context in which market players operate. The risks are evaluated taking into consideration the legal framework and its effectiveness, and quantitative economic variables. The players included in the assessment for this area are the media content providers and other actors who, even though they generally do not produce original news content, have a relevant role and a substantial impact on the distribution of the media content, such as digital intermediaries. Threats to market plurality may emerge from the lack of transparency in media ownership; from highly concentrated markets, both on the production and the distribution side; from the poor economic sustainability of the media industry and from the influence of commercial and owners' interests on editorial content.
- **Political Independence.** The Political Independence area is designed to evaluate the risks of the politicisation of the distribution of resources to the media; political interference with media organisations and news-making; and political interference with the public service media. Further, it looks at the availability of safeguards against manipulative practices in political advertising in audiovisual media and on online platforms (including social media).
- **Social Inclusiveness.** The Social Inclusiveness area examines access to the media by various social and cultural groups, such as minorities and marginalised groups, local/regional communities, people with disabilities, and women. Different social groups' access to the media is a key aspect of a participatory media system, and it is a core element of media pluralism. Media literacy, as a precondition for using the

media effectively, is also included in the Social Inclusiveness area, as well as the protection against disinformation and hate speech, to ensure that there is a safe media space for everybody.

This categorisation into four areas allows for an assessment that encompasses the different components and meanings of “media pluralism”, which have been identified by the CMPF, based on existing standards, such as those that are promoted, amongst others, by the Council of Europe, the European Union, or UNESCO. The four areas that compose the MPM are assessed according to the scoring of a questionnaire, which is made up of 200 variables. Variables are grouped into sub-indicators, while sub-indicators are grouped into indicators, which are integral parts of each MPM area.

The 200 variables that compose the MPM questionnaire are divided into three types of questions: legal, economic, and socio-political. Legal (L) questions are focused on whether or not a particular provision exists in a country’s legal framework, and whether due process is in place to ensure the effectiveness of the existing legal safeguards. Socio-political (S) questions examine the actual practice (i.e., a reality check). Finally, economic (E) questions are designed to assess the risk, based on the economic factors and data that are related to, and that affect, media pluralism (e.g., market revenues, audience shares, employment, innovation). Legal and socio-political variables are closed questions answered either by yes/no, or by a three-option reply: low risk, medium-risk, high risk. In some cases, socio-political variables are answered by providing numerical values; and this is also the case with the majority of economic variables (e.g.: internet access; indexes of concentration). When the answers are numerical values they are formally translated into a level of risk (low risk, medium-risk, high risk). For each variable, the level of risk is defined either based on percentile scores, or according to a threshold based on existing standards, such as those promoted by the Council of Europe, the European Union, or UNESCO, amongst others. Such a method allows for the gathering of both quantitative and qualitative data, which has proven to be crucial in assessing the risks to media pluralism in the EU. Additionally, this method allows for the quantitative analysis of answers, and the production of a numerical risk assessment, which is essential in order to obtain comparable results across countries. Starting from the MPM2020, variables that refer specifically to the online environment are marked as being digital ones, in order to allow for the extraction of a specific digital-related score when valuable.

Data used for the MPM. To meet the challenges that emerge from this periodic, large-scale, comparative analysis, the MPM is mostly informed by secondary data, which are collected through the questionnaire, and are supplemented with primary data, gathered through interviews and document analyses of legal and academic texts, amongst others, together with the Group of Experts’ evaluation (see below) of those variables that are more difficult to measure, and/or that require a qualitative type of measurement, and/or that have shown a lack of measurable and easily verifiable data. As highlighted by the

first MPM's pilot test (2014), there are many reliable, available materials which can be used as primary and secondary sources, e.g., national laws, case law, decision practice, governmental documents, NGO reports, official statistics, commercial sources/financial reporting, and academic research. The secondary data analysis, with the cited integrations, has therefore proven to be a useful and effective approach in ensuring reliable and valid findings in the context of this project. When comprehensive, EU-wide data are available for a given variable (for example, through Eurostat surveys); the CMPF suggests that the country teams use a common dataset in their assessments to ensure that answers are more easily comparable across countries.

Data collection. For each edition of the MPM, the questionnaire is filled by national country teams. These teams are composed of experts in media pluralism and media freedom. Cooperation with national teams of experts is essential for the implementation of the MPM. First, due to the necessity of relying on secondary data, which is often in the native language, it is essential to have local experts who are not only able to collect these data but who are also able to evaluate their reliability and validity. A further benefit of using a local team to implement the MPM is the teams' abilities to build on their access to local networks, particularly with regard to local stakeholders. Local teams' input in growing the network of informed stakeholders who join in the discussion on media pluralism has proven to be invaluable. Finally, local teams are fundamental in providing answers to socio-political questions. Since objective ways of measuring certain variables are sometimes missing, local teams must provide their expert evaluation. Having a reliable and independent local team, composed of renowned experts in this field, is therefore crucial for the implementation of this project.

The data are collected using an online platform that was developed by the CMPF. The CMPF team checks and supervises the quality and consistency of the data collected, and of the methodology used. The final assessment per area of risk is carried out using a standardised formula that has been developed by the CMPF (please see Paragraph 5.2 on the MPM's calibration).

Group of experts. For several particularly sensitive and complex variables, the MPM employs an external peer-review system, called the Group of Experts. This group of experts, which is made up of national stakeholders and experts, conducts a review of a set of variables that require a qualitative type of measurement, and/or that needs answers that cannot be based on measurable and easily verifiable data. Based on the Group of Experts' review, the country teams either decide to confirm or modify their original assessment.

External peer review. For a list of selected countries, the final country report, which is authored by the country team, is independently peer-reviewed by a leading media scholar in the country concerned. The procedure aims to maximise the accuracy of the

final report. In these cases, the country report does not necessarily reflect the views of the additional peer reviewer. However, the reviewer acknowledges that there is enough empirical evidence to justify the content of the country report. The country reports that are submitted to this additional peer-reviewing may change every year and are selected in such a way that they represent all of the different European regions. Countries are selected for peer review for at least one of the following three reasons:

1. a quickly evolving situation during the year studied,
2. a change of country team, and,
3. the presence of a high-risk evaluation in the previous MPM country reports.

A.2 MPM calibration

Determination of the risk level. To determine the risk for each variable, sub-indicator and indicator, a standardised formula is applied to the entire MPM questionnaire. The formula was designed by drawing from previous studies, in which the indices were based on a list of questions/indicators for which the answers were calibrated on a scale from 0 to 1 (e.g., Gilardi, 2002; Hanretty, 2009).

In other words, each variable is assessed by a question and receives a score from 0 to 1, according to the specific answer. Those questions that are dichotomous, with a yes/no reply, are rated 0 or 1. The polychotomous variables (e.g., three-option replies or variables with numerical values) are rated 0/0.5/1, according to the band into which the reply falls. In those cases, low risk is associated with 0, medium-risk with 0.5, and high risk with 1.57 Scores closer to 0 indicate a low-risk assessment, while those closer to 1 indicate an assessment of high risk. The MPM allows the possibility of answering by using the options “not applicable” and “no data” for all of the questions. Their coding will be explained below.

Not applicable. The option “not applicable” was introduced in the MPM2015 to better capture the specificities of the national contexts and to allow for the exclusion of those questions that are irrelevant to, or are inapplicable to, a country’s media system. For example, if a country does not have any state subsidy for the media, the questions relating to the existence and implementation of the legislation to ensure fair and transparent allocation were coded as “not applicable”. This reply option is also used with logically dependent variables: for example, if the variable question asks whether there is a law that aims to protect the freedom of expression, and the answer to this question

57 The same calibration is applied to the quantitative answers to all of the Economic questions (E), whose answers were firstly transformed into qualitative replies (low, medium, high risk), based on pre-set benchmarks.

is “no”, then the variable that follows, which asks about the effectiveness of the law, is coded as “not applicable”. All the questions coded as “not applicable” are excluded from the final calculation.

Assessing the risk for No data answers. As the previous implementations have shown, some of the data—mostly those relating to economic factors— are missing across many of the EU Member States. To better capture this information, the MPM allows the option of a “no data” answer. When answering “no data” to a variable, the country teams are asked to evaluate whether the lack of data represents a transparency problem within their national context, i.e., to evaluate whether the lack of data should be seen as being problematic in their country. In this way, the specific characteristics of the national context are accounted for, since there may be a variety of reasons why certain data are not available/accessible across EU Member States and candidate countries, and not all reasons may be causes for concern.

To ensure that all “no data” answers are taken into account in the national risk assessments in the same way, a standardised procedure for assigning values to the “no data” answers was developed by the CMPF. According to this procedure, each “no data” answer is coded and is assigned one of the following five possible values: 1) Very Low Risk: a value of 0.00; 2) Low Risk: a value of 0.25; 3) High Risk: a value of 0.75; 4) Very High Risk: a value of 1; 5) Missing data: when the absence of data is due to technical issues it is interpreted as being “not applicable”, and is excluded from the analysis.

Generally, the following procedure was applied: if a local team took a position in the answer that indicated that a high risk was present, or, in contrast, that the lack of data was not problematic, then the CMPF followed this suggestion, and coded it accordingly, as “no data”, with either a low or a high-risk value. In cases where the answer was vague, or where its meaning had to be deduced, the following criteria were considered:

- Taking into account the local context: whether the data were not collected because they were considered to be of limited interest (e.g., because the country is too small to collect detailed information on a given issue; because a particular medium has a very limited reach), then a “low risk” value was assigned;
- If there was an evasion of a legal requirement to collect the lacking data, then a “high risk” value was assigned;
- The number of the “missing data” values was limited, as much as possible, and was adopted only as a residual category in cases where comments that evaluated the reason behind the lack of data were missing, were incomplete, or were impossible to interpret;

- The “very low risk” and “very high risk” options have been introduced since the 2020 MPM implementation. This was done to take better account of the phenomenon of a lack of data in the Market Plurality area; the “very high risk” option is used in cases in which data on both the concentration of markets and audiences are not provided in the country (as the lack of data forbids the implementation of regulatory remedies or of policy measures to safeguard media pluralism).

No data for the Market Plurality Area. In the Market Plurality area, the MPM questionnaire asks for numeric values with which to assess concentration (Top 4 index for market and audience) in the indicators on Plurality of media providers and Plurality in digital markets, in the news media ownership (horizontal and cross-media), in the online audience and in the online advertising market. A lack of data for these indicators is coded as being a risk (high or very high), as their availability is a condition for the market to be transparent and open, and is a precondition of any intervention to protect or restore external pluralism, and on which to base public support for the media sector, if necessary. The evaluation of the lack of data in the Market area thus follows additional guidelines.

A. In relation to the questions regarding market and audience concentration, here, the lack of data can be coded as being high risk or very high risk, or as there being no available data, according to the following criteria:

- if country data on audiences are available, but those on revenue shares are not, and vice versa: the “No data” answer is given a “missing data” value, meaning that the findings are based on the available variable. In other words, the missing data is considered to be optional, as audience measurement or revenue measurement alone, are sufficient to assess the market concentration;
- if the country produces neither data on the audience nor the revenue shares: the lack of data for revenue shares is coded as being a “very high risk”, and the lack of audience share data as “missing data”;
- if data are difficult to collect, due to the evolving technological environment (e.g., a lack of standardised metrics with which to measure the digital media market and the audience), then the lack of data is coded as being a high risk.

B. For questions requiring the revenues and employment data in the indicator on Media viability:

- Concerning the sub-indicator on revenue trends, the MPM aims to assess the economic trends in the year of implementation. Considering that official primary data may not be available at the time of the data collection, other sources (research, commercial industry, stakeholders’ associations) can be used by the country teams to provide an estimate of the economic trends, under the CMPF’s supervision. The lack

of data is consequently evaluated by taking into account the national context (e.g., whether they are not yet available at the time of the data collection, or are permanently unavailable; if the sector lacking data is not relevant in the country, e.g., the local media in a very small country; the transparency of the advertising market).

All “no data” assigned values have been double-coded by CMPF, meaning that two independent coders assigned one of the prescribed values to each “no data” answer. In cases where the coders disagreed, a discussion was held between those coders until a consensus on the final value was reached.

A.3 MPM aggregation method

The aggregation method relies on approaches that have been used in previous studies (for an overview, see Hanretty & Koop, 2012), but it takes into account the traditions and logic of the Media Pluralism Monitor. Specifically, the method is based on the mean of the item scores, used as the most common aggregation method to calculate indices; it was updated to take into account the logic of the MPM, which has traditionally relied on the groupings of legal, socio-political, and economic variables.

Consequently, the procedure for establishing the risk assessment of an area works as follows:

1. Calculate the mean of L variables within the sub-indicator;
2. Calculate the mean of E variables within the sub-indicator;
3. Calculate the mean of S variables within the sub-indicator;
4. Calculate the mean of 1), 2) and 3). This is the result of the sub-indicator.
5. The value of the indicator is calculated as the mean of all its sub-indicators.
6. Finally, the risk assessment of the area is calculated as the mean of all its indicators (five per area).

It should be noted that all values were presented as percentages, for ease of use and interpretation (e.g., a score of 0.46 is presented as a risk of 46%). The results for each area and indicator are presented on a scale from 0% to 100%. Each score is rounded to hundredths. If the digit at the hundredth place is equal or superior to 5, the risk level is rounded up. If the digit of the hundredth place is inferior to 5, the risk level is rounded down. For example, a score of 0.46666 will be rounded to 0.47 or 47% while a risk level at 0.463333 will be rounded to 0.46 or 46%.

Scores between 0 and 33% are considered to be low risk, above 33 to 66% are considered to be medium-risk, while those between above 66 and 100% are thought of as being high risk. On the level of indicators, scores of 0 were rated as 3%, and scores of 100 were rated as 97%, by default, in order to avoid an assessment of a total absence or a total certainty of a given risk, as these concepts contrast with the natural logic of the MPM tool. This trimming of the extreme values was introduced as a methodological novelty in the MPM2016; it was developed in collaboration with Gianni Betti, Professor of Statistics at the University of Siena.

The procedure for determining the risk assessment of variables, sub-indicators, indicators and areas, detailed above, allowed the MPM to benefit from a standardised formula for all levels of the Monitor. This has enhanced the comparability of results among the different levels of the Monitor, has decreased the arbitrariness in assessing the risk assessments of the various indicators, and, overall, has increased the validity and reliability of the findings. Furthermore, this formula has also contributed to establishing a better balance between the evaluation of the legal framework (L variables) with the evaluation of the actual situation for media pluralism and media freedom, in practice, as it is captured by the socio-political and economic variables. Finally, the MPM formula has also enabled the establishment of risk assessments which are better tailored to the specificities of the national contexts (through the introduction of the “not applicable” and “no data” answers). In this way, the differences and similarities among the Member States and candidate countries were better captured and reflected in the risk scores.

A.4 Research and the fine-tuning of the questionnaire for the MPM 2024

For the MPM2024, as in all the previous years, the CMPF has updated and fine-tuned the MPM questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the newly available data.

In the MPM2020, a major change was implemented, to update the MPM tool in relation to digital developments in the media field. Moreover, variables on laws' existence and implementation were, in many cases, merged and transformed into questions with three answer choices, in order to allow more nuanced assessments for the country teams, and to open space in which to introduce new (digital) variables, always maintaining the manageable dimension of the tool. For an extensive description of such changes, please see the MPM2020 Final Report.

In the MPM2024, no major change was implemented. A description of the main differences, compared to the MPM2023 questionnaire, is given below.

The first area assessed by the Monitor is called “Fundamental Protection” (until 2020, it was called “Basic Protection”). Its five indicators are the same as those in the previous MPM round: (1) Protection of freedom of expression, (2) Protection of the right to information, (3) Journalistic profession, standards and protection, (4) Independence and effectiveness of the media authority and, (5), Universal reach of traditional media and access to the Internet. In the MPM2020, new variables and new sub-indicators were included in the Fundamental Protection area in order to address the potential challenges to freedom of expression online (please see the methodological section of the MPM2020 Final Report). In the MPM2024, only minor changes were made in terms of text revision and the rephrasing of four variables to provide clearer definitions of the concepts we are measuring. For instance, in the variable that assesses the exemptions from the right of access to information, we added a list of all permissible exemptions that are consistent with international standards. The second change is related to two variables about strategic lawsuits against participation (SLAPPs). In the first variable, which assesses the presence of legislation that prevents SLAPPs, we specified that this does not have to be a dedicated SLAPP law. In our methodology now, other legislation in place that provides for the necessary safeguards to address SLAPPs in full respect of democratic values and fundamental rights, including the right to a fair trial and the right to freedom of expression, is deemed sufficient. Finally, the last change refers to the media authority's sanctioning powers and their effectiveness. The variable now explicitly acknowledges that the sanctioning powers can be both effective and misused to intimidate dissenting views broadcasted in the independent media. Therefore, the existence of sanctioning mechanisms and their effectiveness do not always generate positive outcomes for media freedom and pluralism and do not automatically represent a low-risk environment.

In addition, as the indicators produced by the European Commission for the Digital Economy and Society Index, which we used to measure variables 52 and 53 on internet coverage and access, were discontinued, we had to look for substitutive data sources. In the MPM2024, we opted for Eurostat data. Variable 52 assessing broadband coverage in a population is now measured by the “isoc_cbt” variable from the Eurostat dataset on Broadband Internet coverage by technology. Variable 53 evaluating broadband subscriptions is now measured by the “isoc_ci_in_h” variable from the Eurostat dataset on the level of Internet access.

The design of the Market Plurality area has gone through some slight changes in MPM2024, in order to update, fine-tune and enrich the questionnaire and to take into consideration 1) the evolution of the EU legal framework; 2) the evolution of the media markets in the digital environment; and 3) to facilitate the data collection and reduce the number of “No data” answers.

The indicators of the Market Plurality area impacted by the revisions in MPM2024 are:

- Plurality of media providers
- Media viability
- Editorial independence from commercial and owner influence.

The revisions of sub-indicators and variables are as follows:

1. Plurality of media providers (until MPM2023, named News Media Concentration).

The structure of the indicator, the sub-indicators and the variables has not changed. In the economic variables, asking for the Top4 index for each sector of the media market (horizontal concentration) and the media market as a whole (cross-media concentration), the thresholds to assess the risks of concentration have been revised as follows:

	Previous thresholds	New thresholds
Low Risk	below 25%	below 40%
Medium-risk	between 25% and 50%	between 40% and 60%
High Risk	above 50%	above 60%

We decided to revise the thresholds to assess the concentration in the market of media content providers following an analysis of the state of the industries and the markets, and the debate in research and at policy level. The rationale for the thresholds’ revision and the setting of the new levels has been explained in Carlini (2024). It is also in line with the new EU regulatory framework on media market concentrations, which highlights the need for an accurate measurement of media concentration, and the challenges of the existing ones in the digital environment (Regulation (EU) 2024/1083, Art. 22 and 24).⁵⁸

⁵⁸ Art. 22(1) introduces harmonised regulation on the assessment of media concentrations. Art. 22 (2) lists, among the criteria to be taken into account to evaluate the impact of the concentration on the formation of

2. **Media viability.** Changes were introduced mainly in the sub-indicator on revenue trends. The MPM data collection is usually conducted when the financial reports for the year are not yet available, and not all the countries have available estimates or forecasts on the sector(s). To facilitate the assessment, in the MPM2024 we introduced the evaluation of the period 2019-2023. Moreover, the variable assessing the economic sustainability of local media has been rephrased and its answer was submitted to peer review by the Group of Experts (see earlier, under 5.1). In the sub-indicator on employment trends, the variable on closures of newsrooms and layoffs was merged with the question that asks about the yearly changes in the number of employed journalists.
3. **Editorial Independence from commercial and owners influence.** The sub-indicators and some variables have been restructured, grouping the variables related to the Integrity of the newsroom, and the ones pertaining to the Integrity of content. A new variable was added under the sub-indicator on the Integrity of the newsroom, focusing on the existence of mechanisms granting protection to journalists from arbitrary interference by owners or management. A sub-indicator has been added to assess separately the impact of “owners’ interest” on editorial content; in this sub-indicator, a new variable has been introduced, asking if the owners of the leading media in the country have relevant interests in, links to or activities in non-media businesses.⁵⁹

The **Political Independence** area continues to be composed of the same five indicators:

1. Political independence of the media;
2. Editorial autonomy;
3. Audio visual media, online platforms and elections;
4. State regulation of resources and support for the media sector;
5. Independence of public service media.

public opinion and media diversity, the online environment and the parties’ related interests (together with other criteria in the field of editorial independence and economic sustainability). Art. 24 provides rules to harmonise and update methods of audience measurement “to comply with the principles of transparency, impartiality, inclusiveness, proportionality, non-discrimination, comparability and verifiability”.

⁵⁹ The risks related to mixed media and non-media businesses, in the same company or groups, informs several provisions in the Regulation (EU) 2024/1083, aimed to guarantee transparency, disclosure of potential conflict of interests (art. 6), and as an element to be taken into consideration in the media mergers evaluation. (art. 22(2)).

In the MPM2023, the area saw some significant updates, in particular, with regard to the indicator on the Independence of public service media. The indicator's name was changed from "Independence of PSM governance and funding" for two reasons: one was for simplification; the other, more substantial, was because this indicator now goes beyond assessing political independence in the PSM's management appointments and dismissals and in the PSM's funding. A new variable was included to evaluate those risks that are related to the political independence of the editorial line within the PSM. More specifically, the variable assesses the effective editorial autonomy and independence of the PSM by examining whether editors and editors-in-chief are appointed and dismissed based on professional and objective standards, or whether there are cases of political interference. For the MPM2024 edition, only minor integrations were made to the methodological description of some variables.

The **Social Inclusiveness** area underwent several changes. As per the MPM2023, the five indicators composing the Social Inclusiveness area are as follows:

1. Representation of minorities in the media;
2. Local, regional and community media;
3. Gender equality in the media;
4. Media literacy;
5. Protection against disinformation and hate speech.

In the indicator Representation of minorities in the media, three changes were inserted. First, the expression access to airtime, used in several variables, has been replaced by the expression access to broadcast time. Broadcast time is defined here according to the OSCE (1998) as the "meaningful access to minority to broadcasting through, inter alia, the allocation of frequencies, establishment and support of broadcasters, and program scheduling. In this regard, an account should be taken of the numerical size, geographical concentration, and location of persons belonging to national minorities together with their needs and interests". Such a change aims to clarify that the concerned variables assess not only the representation of minorities in media content but also in media production. Second, two variables—Does the law guarantee access to airtime on PSM to legally recognized minorities? and Do legally recognised minorities have access to airtime on PSM channels in practice?—were grouped into one variable: Does the law guarantee access to broadcast time on PSM to legally recognized minorities, and is the law implemented effectively? Third, the following variable was added to the questionnaire: Does the PSM have a comprehensive diversity policy to promote the representation of marginalised communities? This variable assesses the existence of a diversity policy for the PSM and whether it is efficient. Marginalised communities are defined here as different groups of people

within a given culture, context, and history at risk of being subjected to multiple discrimination due to the interplay of different personal characteristics or grounds, such as age, disability, sexual orientation, gender identity, education or income, or living in various geographic localities. The definition is inspired by the glossary proposed by the European Institute for Gender Equality.⁶⁰ The addition of this variable adds a clear distinction between the representation of minorities (based on linguistic, religious or ethnic features) in the media and the representation of marginalised minorities.

Two main changes have been made to the indicator Local, regional and community media. First, two variables—Is the PSM obliged to keep its own local/regional correspondents or branches? and In practice, does the PSM keep its own local/regional correspondents or branches?—have been grouped into the following variable: Is the PSM obliged to keep its own local/regional correspondents or branches and is the law implemented effectively? This variable assesses whether the PSM is obliged (either via legislation or a functional equivalent) to have its own regional correspondents or branches and whether the law is implemented effectively. In the opposite case, the PSM can rely on material acquired from news agencies. Second, the following report was added: Is the offer of local news services in local areas adequate? This question aims to assess the presence or potential existence of so-called "news deserts" or "white spots" in a country with regard to the offer of local news media. By "news desert", we refer to a geographic or administrative area, or a social community, where it is difficult or impossible to access sufficient, reliable, diverse and independent local, regional and community media, and information (CMPF, 2023).

In the indicator of Gender equality in the media, a precise definition of what comprehensive gender equality is has been added to the methodology of the following variable: Do the PSM have a comprehensive gender equality policy? In this context a comprehensive gender equality policy is defined—in line with point B.4. of the CoE Recommendation CM/Rec (2013) on gender equality and media—as self-regulatory measures, internal codes of conduct/ethics and internal supervision, and development of standards in media coverage that promote gender equality, in order to encourage a consistent internal policy and working conditions aimed at: 1/ equal access to, and representation in, media work for women and men, including in the areas where women are under-represented; 2/ a balanced participation of women and men in management posts, in bodies with an advisory, regulatory or internal supervisory role, and generally in the decision-making process; 3/ a non-stereotyped image, role and visibility of women and men, avoidance of sexist advertising, language and content which could lead to discrimination on grounds of sex, incitement to hatred and gender-based violence. Such precision specifies that a gender equality policy is comprehensive if it includes measures regard-

60 EIGE Glossary - definition of marginalised groups https://eige.europa.eu/taxonomy/term/1175?language_content_entity=en

ing gender-balanced representation in media production as well as in media content. Finally, the answer options for the variable—Are women experts participating in informative and political programmes and articles to the same extent as male experts?—have been rephrased as follows to be more specific:

- Low-risk: The number of experts participating in informative and political programmes and articles is gender-balanced, in most thematic areas.
- Medium-risk: The number of experts participating in informative and political programmes and articles is not always gender-balanced, but there are some visible efforts to monitor and increase the participation of female experts.
- High-risk: There are systematically more male experts participating in informative and political programmes and articles than female experts, and/or the participation of female experts in certain thematic areas is limited.

In the indicator of Media literacy, the Eurostat database used to measure digital competencies has changed. Eurostat is now providing some granular data focusing on Information and data literacy skills. Therefore this variable now assesses only information and data literacy skills, instead of general digital skills. Information and data literacy skills include four competencies: 1/ Finding information about goods or services (IUIF); 2/ Seeking health-related information (IHIF); 3/ Reading online news sites, newspapers or news magazines (IUNW1); and 4/ Activities related to fact-checking online information and its sources. Basic or above basic information and data literacy skills correspond to mastering at least one or more of these four competencies. The risk level thresholds have been revised accordingly.

A.5 Data collection and research network for the MPM2024

Given that the MPM's research design rests on two main methods—a questionnaire and a group of experts' evaluations—two main types of data were collected during its implementation, namely, answers to the questionnaire and comments from the experts who were engaged in the evaluation of the answers.

Most of the MPM2024 research network was confirmed from the 2023 implementation, in an effort, as much as possible, to ensure continuity, and therefore improve comparability. However, two new country teams integrated the research network for Finland and Malta, while some new researchers integrated the national teams in Croatia, France, and Latvia. This year, the data collection for Estonia has been carried out directly by the CMPF team, while for the first time an external local team has carried out the data collection for Italy. The MPM2024 research network is composed as follows:

Figure 6.6.a. MPM2024 Country teams

Country	Affiliation	Name
Albania	Balkan Investigative Reporting Network (BIRN)	Kristina Voko, Besar Likmeta
Austria	Institute for Comparative Media and Communication Studies (CMC)	Josef Seethaler, Maren Beaufort
Belgium	Katholieke Universiteit Leuven (KU Leuven)	Peggy Valcke, Ellen Wauters
Bulgaria	Foundation Media Democracy	Orlin Spassov, Nelly Ognyanova, Nikoleta Daskalova
Croatia	Institute for Development and International Relations (IRMO)	Paško Bilić, Antonija Petričušić
Cyprus	Institute for Mass Media	Christophoros Christophorou, Nicholas Karides
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