

MONITORING MEDIA PLURALISM IN THE EUROPEAN UNION

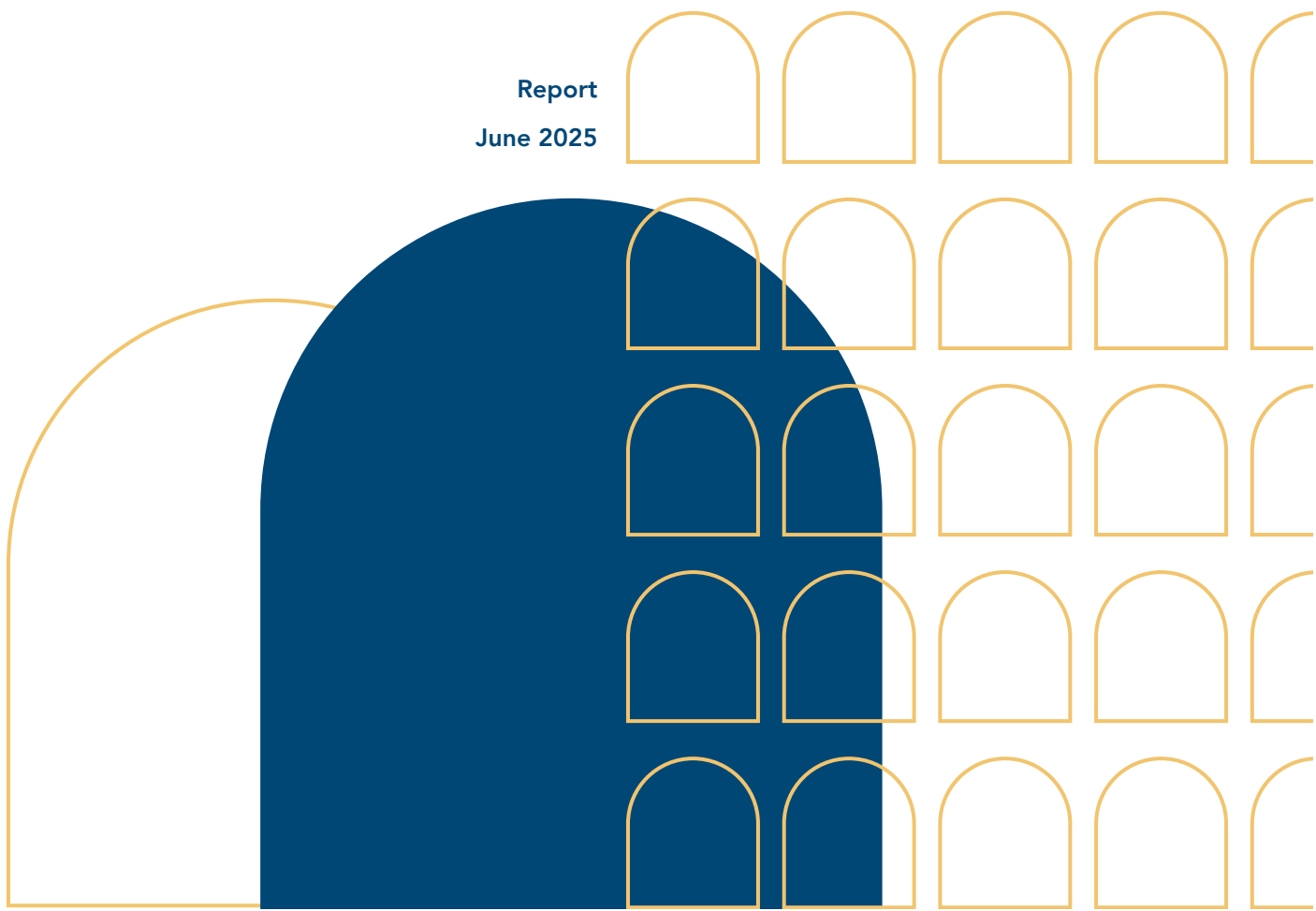
Results of the MPM2025

Centre for Media Pluralism and Media Freedom

Authors

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Report
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Media Freedom and Pluralism at a Critical Juncture

In recent years, shifting geopolitical dynamics, often boosted by the (ab)use of information technology, have not only disrupted international power structures but have also begun to erode fundamental principles long regarded as the bedrock of liberal democracies. Foundational tenets such as the protection of fundamental rights, including freedom of expression, institutional checks and balances, including the role of the parliaments and opposition parties, and the legitimacy of democratic institutions and ways of deliberation - previously considered settled achievements of Western constitutions - are increasingly subject to contestation, even in countries that used to be beacons of the rule of law and democracy. The rise of authoritarian governance models, coupled with declining respect for international legal norms, has raised attention to the need to be even more vigilant over democratic values in order to safeguard them.

These challenges have had significant ramifications for the media sector, where the role of independent journalism and media in upholding transparency and accountability has been increasingly undermined by disinformation campaigns, political manipulation and widespread mistrust. As these structural transformations unfold, it becomes evident that media freedom and media pluralism transcend national or sector-specific concerns, representing a central axis in the ongoing defense of the rule of law and democracy.

It does not come as a surprise, then, if at the heart of today's debates on democracy is the question of how to define and protect freedom of expression. Although widely valued across liberal democracies, its interpretation varies significantly across countries, in particular when discussed in the context of online platforms' liability: differing legal traditions shape how online content is governed and, in the end, also determine policies to ensure media pluralism. Freedoms entail responsibilities - responsibilities from which technology companies have, for (too) long, been exempted. As these companies increasingly assume the roles of editors, curators, and gatekeepers of the news and information sphere, it is essential to scrutinise whether their very design aligns with democratic principles and societal needs. When online platforms function as critical infrastructure for the information ecosystem, their architecture profoundly influences both democratic discourse and the visibility of journalism within it.

The digital transformation has profoundly reconfigured traditional models of journalism and media production. While digital technologies reduced entry barriers and have allowed more people to freely express themselves, have access to unlimited information, and facilitated innovative modes of storytelling, they have also undermined traditional revenue streams for the media sector, weakened the relationship between media and their audiences and the overall findability of quality journalistic content, allowed for

massive dissemination of disinformation, and entrenched the dominance of digital platforms that exert opaque influence over information flows.

The decline in print advertising revenue, the collapse of local journalism, and the redirection of advertising expenditure towards dominant digital intermediaries have rendered numerous media outlets economically unsustainable. In smaller markets or politically sensitive contexts, such financial fragility often leads to editorial compromise, concentration of media ownership, and susceptibility to political influence.

European legislative initiatives such as the Digital Services Act (DSA) and the European Media Freedom Act (EMFA) represent, in their own ways, fundamental efforts to reassert a human rights centred approach to uphold the freedom of expression and media pluralism. These legal frameworks aim on the one hand to mitigate the asymmetrical power dynamics between technology platforms, public institutions, and the recipients of services, and on the other hand to foster a regulatory environment that is conducive to a pluralistic media market and a pluralistic public discourse.

In particular, the EMFA, approved in 2024 and mainly entering into force mostly in 2025, constitutes the most comprehensive EU regulatory initiative to date aimed at establishing a cohesive regulatory framework to promote editorial independence, ensure ownership transparency, and fortify media pluralism across the European single market. It seeks to provide safeguards against arbitrary government intervention, enhance cooperation among national regulatory bodies, and bolster resilience against both economic and political pressures.

The importance of this endeavour cannot be underestimated. Media freedom and pluralism, as the *Media Pluralism Monitor* (MPM) has witnessed for years, are not merely aspirational values but essential preconditions for the functioning of democratic societies. Their erosion diminishes the public's capacity to engage in informed deliberation, to hold political and economic power to account, and to participate meaningfully in civic life. The long-term health of European democracy hinges upon the development of a media ecosystem that is resilient, independent, and capable of adapting to evolving technological and socio-political conditions.

In conclusion, media freedom and pluralism remain foundational to the democratic project of the European Union. They constitute not only historical achievements but enduring necessities for maintaining an open, informed, and representative public sphere. The contemporary challenges posed by structural market failures, legal uncertainty, digital disruption, online disinformation, forcefully underscore the imperative for coordinated policy interventions and sustained public engagement. Defending these principles is not an ancillary task but a central obligation in the preservation of democratic governance.

The publication of the 2025 edition of the MPM comes, therefore, at a pivotal juncture of unpredictably changing geopolitical equilibria and at the crossroads of a stress test for democracy. As democratic values face mounting pressures and the media landscape undergoes rapid technological and political shifts, the need for robust, evidence-based insights into media freedom and pluralism has never been more urgent and essential.

As it has been doing since its conceptualisation and first implementation, the Media Pluralism Monitor takes a holistic approach, to capture the multifaceted nature of the challenges and transformations affecting media freedom and pluralism today. Notably, this year we have chosen to place greater emphasis on reporting a more extended narrative description of the data we collected during the year of the research, prioritizing in-depth contextual analysis over comparative scoring of the risks, and adding focuses on some of the most pressing issues in all the four areas of monitoring (Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness). Moreover, the MPM2025 gives insights and indications on the state of play of EU countries currently awaiting the full application of the European Media freedom Act, on 8 August 2025.

This approach allows us to better illuminate the nuances behind the collected data and the conducted research and analysis, offering a richer vision and a stream of suggestions for both policymakers and readers.

Our sincere thanks go to the great, knowledgeable, and dedicated CMPF team and to the network of researchers across Europe whose professionalism, expertise, and commitment make the MPM possible every year and, in particular, have made this enriched 2025 edition a reality. Their work and dedication continue to be the foundation of this vital monitoring effort.

CMPF TEAM

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LIST OF ACRONYMS

ACM Authority for Consumers & Markets (*Autoriteit Consument & Markt*)- the Netherlands

AGCOM Authority for Guarantees in Communications (*Autorità per le Garanzie nelle Comunicazioni*) - Italy

AI Artificial Intelligence

AIA Artificial Intelligence Act

ALIA Luxembourg Independent Audiovisual Authority (*Autorité luxembourgeoise indépendante de l'audiovisuel*)

AMA Audiovisual Media Authority (*Autoriteti i Mediave Audiovizive*)- Albania

ARCOM Regulatory Authority for Audiovisual and Digital Communication (*Autorité de régulation de la communication audiovisuelle et numérique*)- France

AVMS Audiovisual media services

AVMU Agency for Audio and Audiovisual Media Services (*Агенција за аудио и аудиовизуелни медиумски услуги*) - The Republic of North Macedonia

BİK Press Advertisement Agency (*Basın İlan Kurumu*) - Türkiye

BNR Bulgarian National Radio (*Bălgarsko nacionalno radio*)

BNT Bulgarian National Television (*Balgarska natsionalna televizija*)

CASE Coalition Against SLAPPs in Europe

CEM Council for Electronic Media - Bulgaria

CMPF Centre for Media Pluralism and Media Freedom

CNA National Audiovisual Council - Romania

CNMC National Commission on Markets and Competition (*Comisión Nacional de los Mercados y la Competencia*) - Spain

DSCs Digital Services Coordinator(s)

DSA Digital Services Act

EDMO European Digital Media Observatory

EMFA European Media Freedom Act

ERR Estonian public service media (*Eesti Rahvusringhääling*) - Estonia

EU European Union

FIMI Foreign Information Manipulation and Interference

FTTP Fibre to the Premises

GAFAM Google, Apple, Facebook, Amazon, Microsoft

GDP Gross Domestic Product

GDPR General Data Protection Regulation

HRT Croatian Radiotelevision (*Hrvatska radiotelevizija*)

KRRiT National Broadcasting Council (*Krajowa Rada Radiofonii i Telewizji*)- Poland

KEK Commission on Concentration in the Media (*Kommission zur Ermittlung der Konzentration im Medienbereich*) - Germany

LGBTQ+ Lesbian Gay Bisexual Transgender/Transsexual Queer (+ = open)

LRT Lithuanian National Radio and Television (*Lietuvos nacionalinis radijas ir televizija*)

MPM Media Pluralism Monitor

MFRR Media Freedom Rapid Response

MS(s) Member State(s) of the European Union

MSP(s) Media Service Provider(s)

NMHH National Media and Infocommunications Authority (Nemzeti Média- és Hírközlési Hatóság) - Hungary

NRA(s) National regulatory authorities

PSM Public Service Media

RAI Italian RadioTelevision (*Radiotelevisione Italiana*)

RSF Reporters Without Borders (*Reporters Sans Frontières*)

RTÉ Ireland's National Television and Radio Broadcaster (*Raidió Teilifís Éireann*)

RTCG Radio Television of Montenegro (Radio-televizija Crne Gore)

RTS Radio Television of Serbia (Radio-televizija Srbije)

RTÜK Radio and Television Supreme Council (*Radyo ve Televizyon Üst Kurulu*)- Türkiye

RTV Radio-Television Slovenia (*Slovenija Radiotelevizija Slovenija*)

RTVE Spanish Broadcasting Corporation (*Corporación de Radio y Televisión Española*)

RTVS Radio and Television of Slovakia (RTVS) - Former Slovakian PSM

SGP Reformed Political Party (*Staatkundig Gereformeerde Partij*) - The Netherlands

SLAPP Strategic Lawsuits Against Public Participation

STVR Slovakian Radiotelevision (*Rozhlas a televízia Slovenska*)

SVT Swedish Television (*Sveriges Television*)

TRAFICOM Transport and Communications Agency (*Liikenne-ja Viestintävirasto*) - Finland

TRT Turkish Radio and Television Corporation (*Türkiye Radyo Televizyon Kurumu*)

TSN French digital service tax (*Taxe sur les services numériques*) - France

TVP Polish Television (*Telewizji Polskiej*)

VLOP(s) Very Large Online Platform(s)

VLOSE(s) Very Large Online Search Engines

VHCN Very High Capacity Network

VSPs Video-sharing platform(s)

Preliminary note on the MPM 2025

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. Implemented every year since 2020, and evolved since 2014, the MPM evaluates, using a normative approach, potential risks to media pluralism within EU member states and candidates. It offers a comparative perspective between countries as well as a longitudinal analysis of the risks over time. For this 2025 edition, the MPM conserved its focus on four key dimensions of media pluralism - Fundamental Protection, Market Plurality, Political independence, and Social inclusiveness - and fine-tuned twenty key indicators (See Table 1).

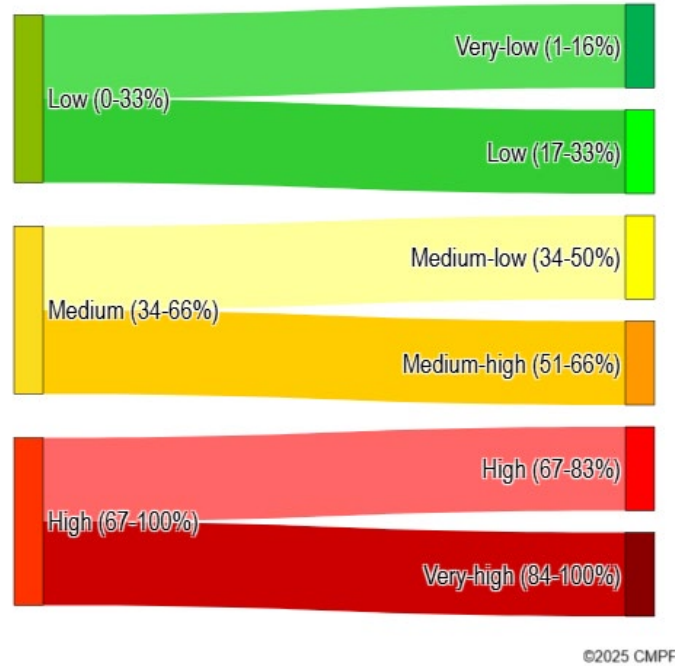
Table 1: Areas and Indicators of the Media Pluralism Monitor

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Universal and inclusive access to media
Protection of information integrity	Plurality of media providers	Editorial autonomy	Representation of minorities in the media
Protection of right to information	Plurality in digital markets	Integrity of political information during elections	Local/regional and community media
Journalistic profession, standards and protection	Media viability	State regulation of resources and support to the media sector	Gender equality in the media
Independence and effectiveness of the national regulatory authorities	Editorial independence from commercial and owners' influence	Independence of public service media	Media Literacy

This year, the *MPM* underwent significant transformations.

First, the risk assessment was expanded from a three-tier system - low, medium, and high risk - to a six-tier system - from very low risk to very high risk (see Figure 1). The adoption of the six-tier system aimed at providing a more granular assessment of the risks to media pluralism and freedom and at making subtil differences between countries more visible, while conserving a form of continuity with the previous implementations of the MPM. To achieve such a continuity, the current six tiers was designed as a redefinition of the previous three tiers. For instance, what was considered as a low risk in previous editions, can be assessed with more precision, being either a very low risk (if the risk score is comprised between 0% and 16%) or a low risk if the score is comprised between 17% and 33%. The same logic applies for the other tiers.

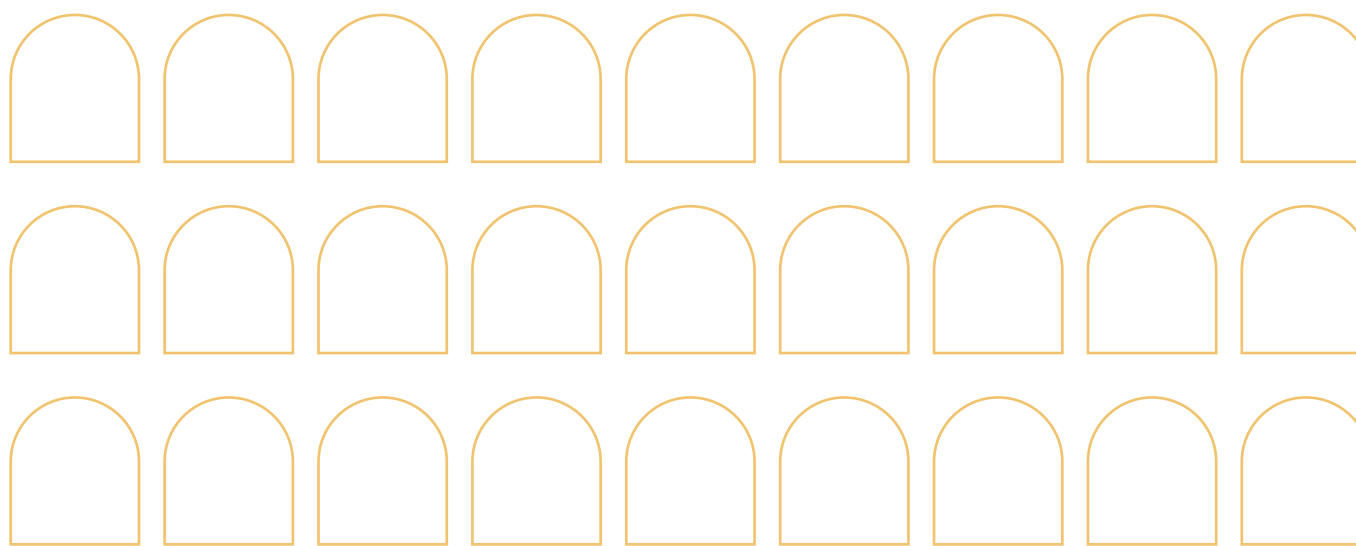
Figure a. Presentation of the six-tier risk assessment system



Second, this report includes some insights on a selection of themes related to the European Media Freedom Act before its entry into full force in August 2025. Most of the standards established by the EMFA were already included in the MPM questionnaire - In total, 63 variables out of the 200 assessed by the MPM questionnaire can be associated with EMFA standards in the 2025 edition - and have therefore been assessed through its successive implementations. However, this year, the CMPF team has made a specific effort to shed light on these EMFA-related standards and to propose an analysis on the state of play of EMFA before its entry into force.

Third, this report dedicates a chapter to the analysis of media pluralism and freedom in the EU candidate countries. Candidate countries have specific challenges that cannot necessarily be compared to EU member states and that need to be analysed separately. This chapter focuses on the traditional MPM standards and includes precise recommendations tailored to the studied countries.

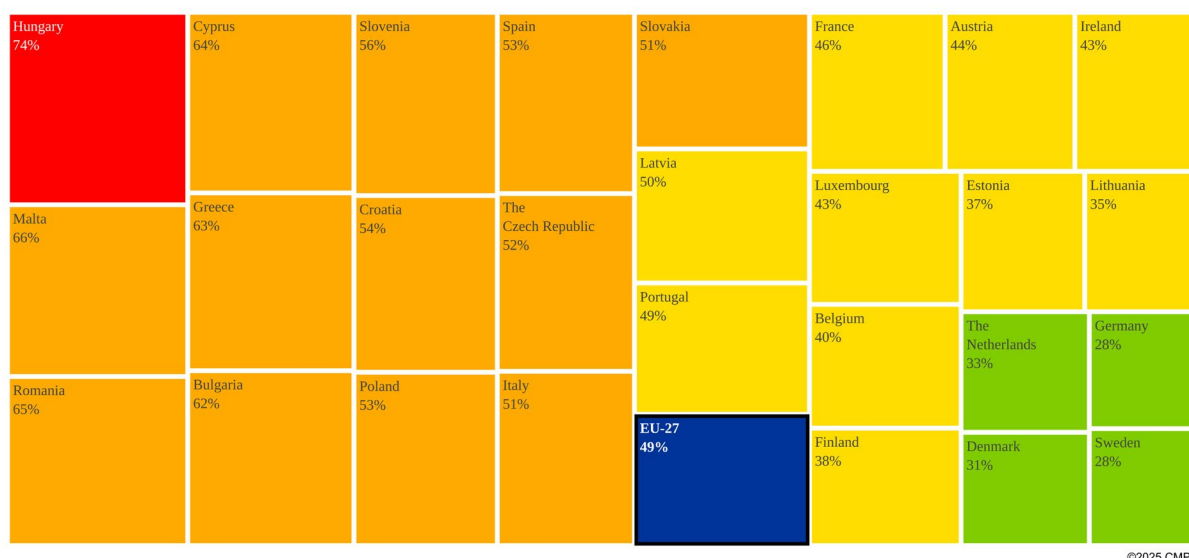
Finally, as for every edition of the MPM, the CMPF has updated and fine-tuned the questionnaire, taking into account the evolution of the information and media sphere as well as of society in general, considering the existence of available data, and based on the experience obtained from previous implementations of the tool. This year, a total of 40 variables were modified or added out of 200. Therefore, the MPM results for 2025 are not strictly comparable with the results of previous editions. The details of methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.



CHAPTER 1. Results Snapshot

1.1. MPM2025 General Ranking

Figure 1.a. MPM2025 - General ranking treemap - EU-27

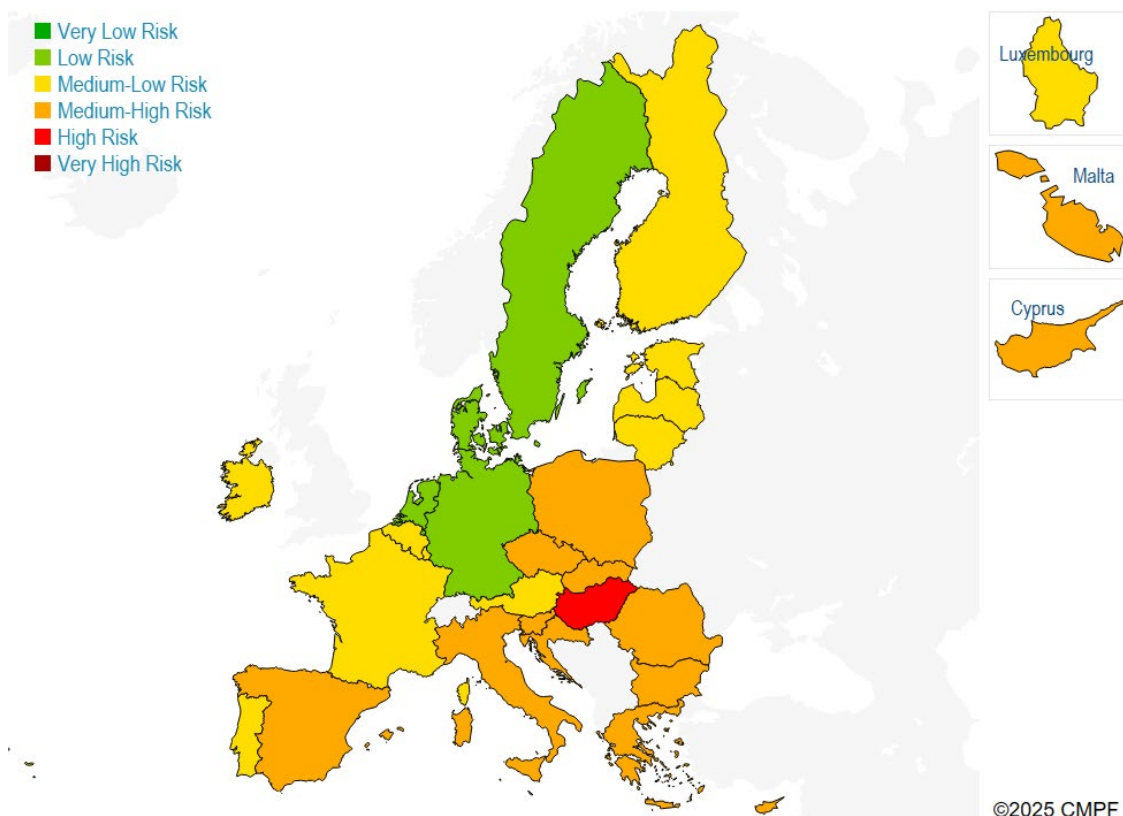


Since the 2022 edition of the Media Pluralism Monitor, the CMPF has featured the general country ranking to provide a clear picture of how EU Member States fare within the broader European context as regards the risks to media pluralism and media freedom. The general ranking represents each Member State's overall risk score, calculated as the simple average of the risk scores across the four thematic areas of the MPM: **Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness**.

The MPM2025 general ranking shows that:

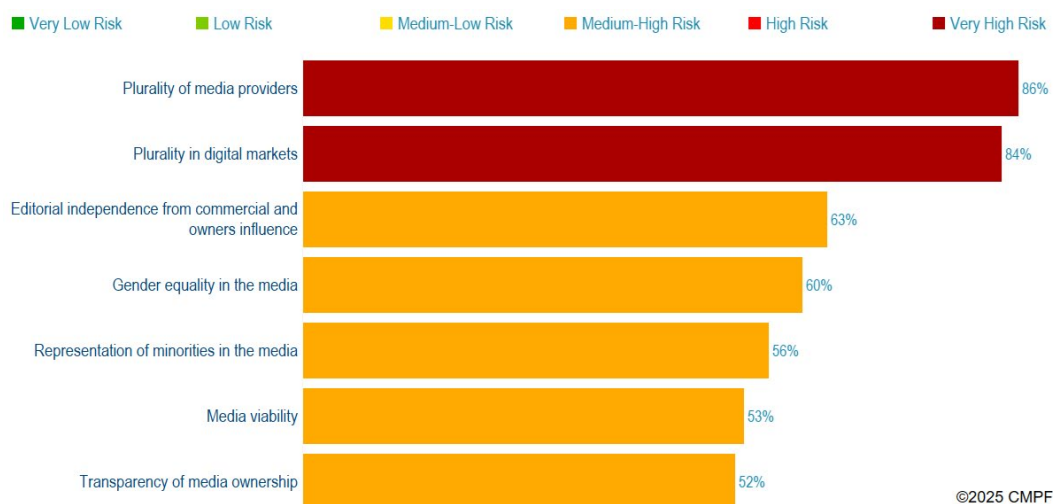
- No Member State falls into the extreme risk bands (very-high / very-low), with only Hungary falling into the high-risk category. Most Member States (22) are assessed as medium-risk, with roughly half of them falling into the upper band of the medium-risk category (medium-high) (Italy, Slovakia, the Czech Republic, Spain, Poland, Croatia, Slovenia, Bulgaria, Greece, Cyprus, Romania and Malta) and the other half (Lithuania, Estonia, Finland, Belgium, Ireland, Luxembourg, Austria, France, Portugal, and Latvia) at the lower tier of the medium risk band (Medium-low).
- The average risk score for the EU, estimated at 49%, falls within the medium-low risk band. The average is slightly inferior to the median risk (50%, as with Lithuania), showing the positive impact of the best-performing countries.
- Only four Member States - Germany, Sweden, Denmark, and the Netherlands - are assessed in the low-risk category. Their good performance reflects strong **Fundamental Protection** of the media, as well as good safeguards to the **Political Independence** of the media, and to a lesser extent, to the inclusive media environment. Concerning the latter, Germany stands out as an exception, with specific risks reported relating to gender equality in the media. Despite the broadly resilient performance of the aforementioned Member States across three of the four MPM areas, it is important to note the pronounced risks in **Market Plurality** in these countries, which align with broader EU trends.
- On the brink of the very-high-risk band, Hungary stands out as the worst-performing country by a considerable margin, followed by Romania and Malta, both of which recorded aggregate risk scores hovering near the high-risk band. Both Hungary and Malta exhibit particular shortcomings in the areas of **Market Plurality** and **Political Independence**, as political actors exert outsized control over both private and public media, among other things through their influence over the available means of financing.
- Cyprus, Romania, Bulgaria, and, to a lesser extent, Greece, are all associated with an especially poor performance in **Market Plurality** and **Social Inclusiveness**. While Greece performs badly across the board in all four areas, its risk scores generally fall within the medium-high risk band, ranging from 57% to 67%, with one area reaching the high-risk threshold.
- The worst-performing Member States scored particularly poorly in **Market Plurality** with Cyprus, Hungary, and Romania falling into the highest-risk category.

Figure 1.b. MPM2025 - General ranking - map of the countries by risk level



- Concerning regional trends, the map (see Figure 1.b) paints an all-too-familiar picture of Member States in North-central Europe performing the strongest (the so-called “Corporatist / Liberal” model” by Hallin and Mancini (2004)), followed by the Southern European Member States (the so-called “Polarised Pluralist / Mediterranean” model), with the worst-performing Member States located predominantly in Central and Eastern Europe (the so-called “Post-Communist/Hybrid Media Models” by Jakubowicz et al., 2008; Peruško, 2021).
- Baltic Member States generally fared better than their Southern European counterparts, with Lithuania, Latvia and Estonia all assessed at the lower end of the medium-risk band, and Malta, Cyprus, and Greece verging on the high-risk category.

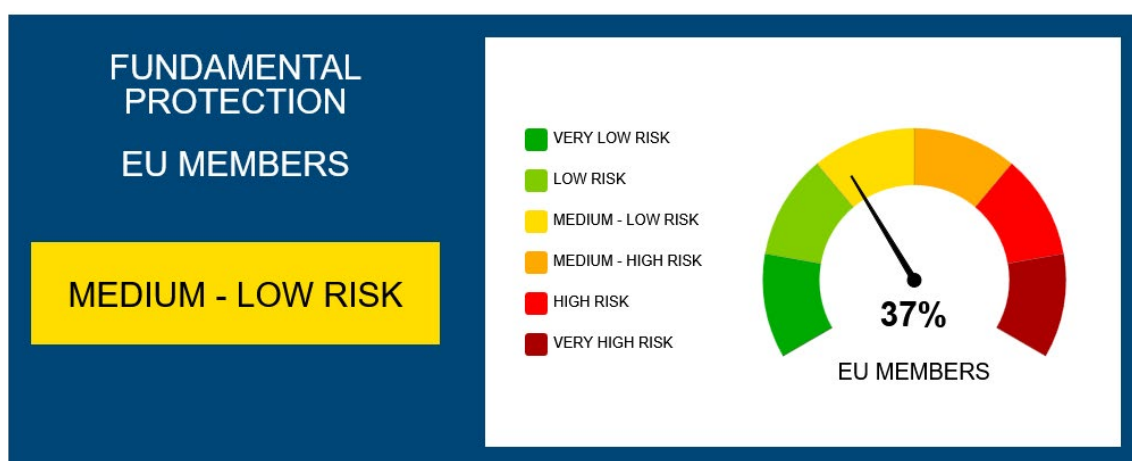
Figure 1.c. MPM2025 - The most problematic indicators



- Seven indicators out of a total of twenty score on average above 50%, putting them in the medium-high risk band or above. This includes all the indicators related to **Market Plurality** and two indicators related to **Social Inclusiveness**. While high risks related to **Market Plurality** indicators were expected as the threats to a diverse and pluralistic media market have always been a source of concern in Europe and worldwide, the poor performances in terms of Social Inclusiveness may be more surprising at first. Yet, this outcome reflects the continued existence of a homogeneous and male-dominated media environment in the European Union.
- The worst performing indicators are Plurality of media providers and *Plurality in digital markets*, both scoring a very high-risk level. These are the two indicators assessing risks related to situations of market power: respectively, in the field of production (concentration of ownership of the media service providers) and of the distribution/access (concentration of the digital intermediaries such as very large online platforms, search engines, and - more recently - AI-based aggregators).
- The concentration of ownership in the digital markets adds to the risks that have historically characterized the media industry. The very high-risk level of the indicator on the plurality of media providers registers the oligopolistic tendencies of traditional media sectors and the fact that these tendencies have not significantly decreased in the digital media sector.
- The concentration of media ownership and decreasing media economic sustainability help to explain the growing risks of commercial pressure and owners' interests, which in turn threaten the integrity of newsrooms and media content.

- Since the MPM2020, *gender equality in the media* has always been the highest scoring indicator outside of the **Market Plurality** area, reflecting the fact that parity has not been achieved in media management, nor in media content.
- The medium-high risk regarding the *representation of minorities in the media* reflects important differences between EU-Member States, as well as between legally recognised minorities and marginalised communities.

1.2 MPM2025 Main Trends per Area



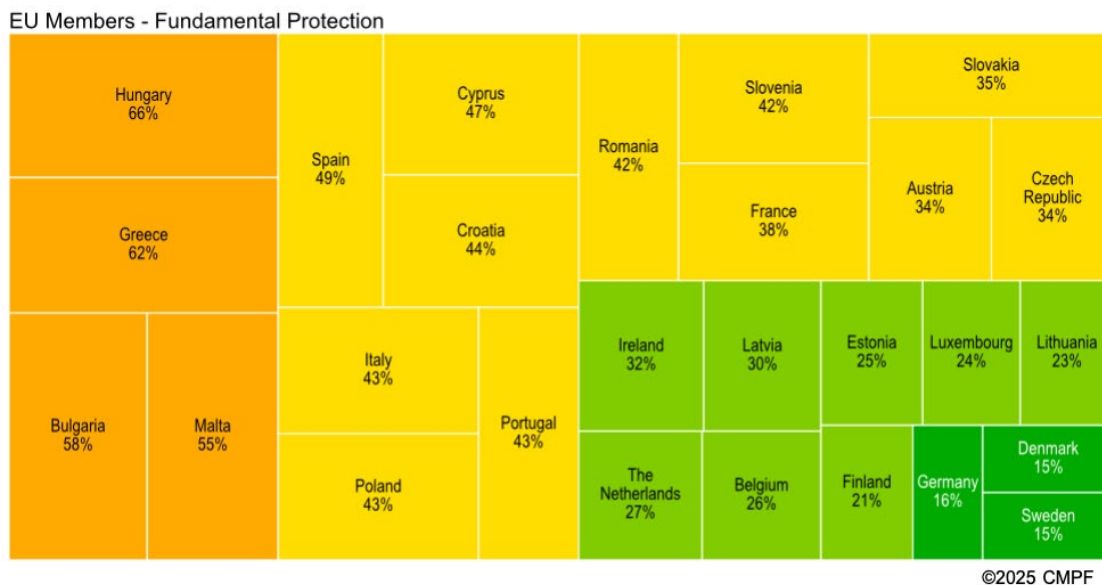
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The **Fundamental Protection** area of the MPM analyses the requirements for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression, offline and online; the right to seek, receive and 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); and lastly, the presence of independent and effective media authorities.

- Across EU countries, the rising number of Strategic Lawsuits Against Public Participation (SLAPPs) and the ongoing criminalization of defamation in most Member States contributed to increasing the risks associated with the protection of freedom of expression.
- Physical and online threats against journalists are also increasing in Western European countries. Online harassment, in particular, is on the rise, which is also due to the increased use of AI and other new technologies to discredit the credibility of journalists (for example, through the creation of fake profiles and deep fakes of journalists). Surveillance of journalists and human rights defenders through intrusive technologies such as spyware is also on the rise and is paired with a lack of specific legal safeguards in most EU countries. In addition, online smear campaigns are common and, most worryingly, are often led by political representatives.

- The working conditions of journalists are deplorable in most EU Member States, with low salaries and weak or absent social security schemes.
- The data provided in the DSA transparency reports by very Large Online Platforms (VLOPs) offer a limited understanding of the risks to freedom of expression. However, the reports do reveal that several countries — especially in Eastern Europe — lack an adequate number of content moderators proficient in their national languages.
- In Bulgaria, Cyprus, Spain, and Croatia, public authorities fail to adequately report their content moderation requests. Otherwise, freedom of expression is generally adequately balanced in cases of government requests to VLOPs for content moderation.
- Public strategy against disinformation, and measures to identify and address Foreign Information Manipulation and Interference (FIMI) are lacking in most of the EU Member States. At the same time, the MPM data collection reveals that coordinated disinformation and influence operations are increasingly considered as a threat. In light of this, countries need to be careful that overreaching censorship policies do not threaten fundamental rights.
- The legal protection of the right to information has improved due to advancements in laws or in the practice of access to information, as reported by some Member States, such as Austria, Bulgaria, Denmark and Luxembourg.
- Although all EU Member States have now transposed the main provisions of Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (“Whistleblowing Directive”), problems persist regarding the effectiveness of laws and the public awareness of whistleblower protection. Cases of sanctioning of whistleblowers were reported by some Member States, such as in the Czech Republic, Poland, and Slovakia.
- The independence and effectiveness of the national regulatory authorities (NRAs) vary considerably across the EU. Hungary, Poland, Italy, Slovakia, and Greece, among other countries, face different cases of political interference, from the appointment procedures of their members to decision making.

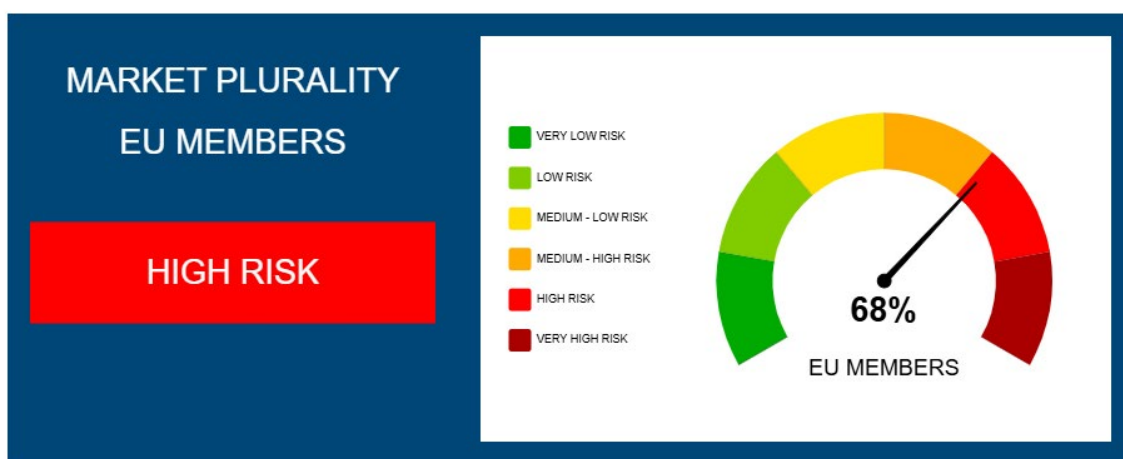
Figure 1.d. Fundamental Protection area - Treemap ranking of the EU-27



- In the **Fundamental Protection** area, no country scores a high-risk level, even though two countries- Hungary and Greece- are on the higher edge of the medium-high risk score. The main issues identified in Hungary for **Fundamental Protection** regard restrictions on journalists accessing certain institutional spaces (for example, parliament or press conferences), the use of the Sovereignty Protection Act against independent media outlets, a deterioration in the scope of access to data of public interest, and lastly, SLAPPs and the lack of political independence of the media authority. This last issue is sensitive in Greece too, where the risk to media pluralism has also increased due to a number of factors, including cases of physical attacks, including a precautionary arrest, against journalists, SLAPPs brought against journalists, the surveillance of journalists, and excessive content moderation by VLOPs with regard to sensitive geopolitical content.
- Bulgaria and Malta also score in the medium-high risk band for **Fundamental Protection**. In Bulgaria, politicians engage in smear campaigns against the media, authorities engage in controversial takedown requests of online content to platforms, the working conditions of journalists are problematic, and the independence of national regulatory authorities is at stake. In Malta, the protection of whistleblowers and access to public information are not well guaranteed, nor is the independence of national regulatory authorities. Likewise, in Malta impunity for crimes against journalists persists.
- Twelve EU countries score a medium-low risk in the **Fundamental Protection** area. Among them are some Western Member States, such as Spain, Italy, Portugal, France and Austria. The risk level in these countries is increased by de-

teriorating working conditions for journalists and the rise in physical and online harassment, especially against journalists covering environmental issues and the massacre of Palestinian civilians in Gaza. In France, the temporary arrest of journalists also occurred in 2024.

- Concerns for the physical safety of journalists are also on the rise in countries that score low-risk and very low-risk, such as the Netherlands, Belgium, Germany and Sweden.
- A common problem for many EU countries, independent of their collocation across the risk bands, is the budgetary independence of NRAs. The adequacy of their technical and human resources is also at stake, considering the increasing tasks entrusted to them by the DSA and EMFA.



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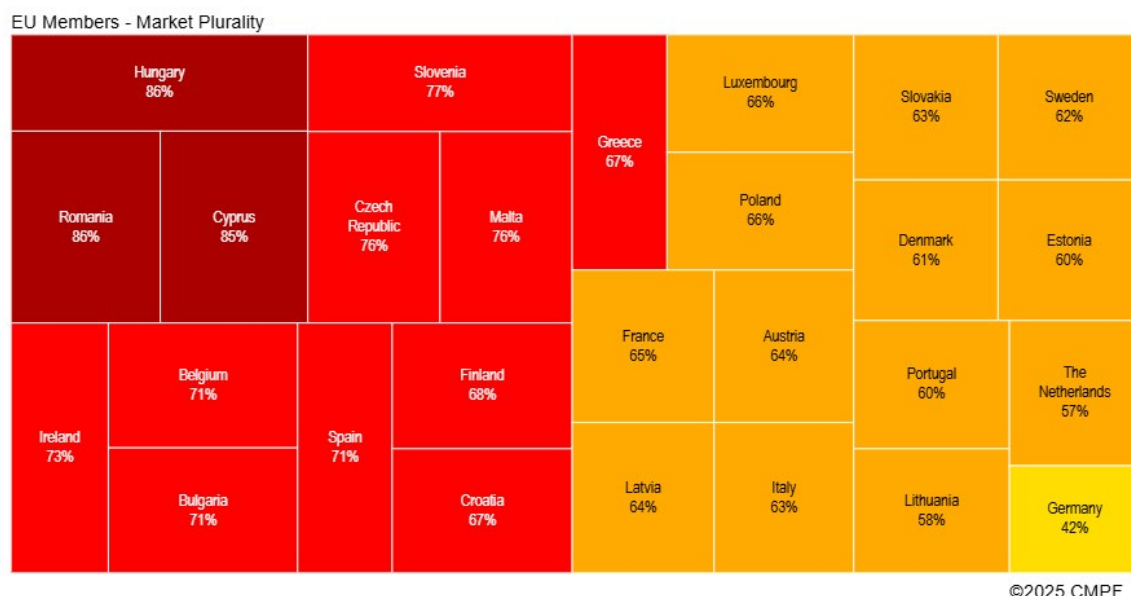
The **Market Plurality** area considers the economic factors that impact the plurality of the media offer, assessing the risks deriving from insufficient transparency and the high concentration of media ownership, the economic sustainability of the media, and the undue influence of commercial interests and ownership over editorial choices. Moreover, the area assesses the risks deriving from the high concentration of digital markets and the dependency of the media on online intermediaries.

- **Market Plurality** is the only area that shows an average high-risk level across EU countries. In this area, three indicators are at medium-high risk, namely *Transparency of media ownership*, *Media viability* and *Editorial independence from commercial and owner influence*. The indicator on the *Plurality of media providers*, which assesses the level of media ownership concentration and the existence of media-specific measures to address it, is at very high-risk level. Risks related to excessive market power are also registered by the indicator on the *Plurality of digital markets*, which includes in its assessment the digital intermediaries to information (online platforms, search engines, aggregators) and, since the current implementation, AI companies. This indicator also registers a very high-risk level.

- Transparency of media ownership is not guaranteed across all the EU Member States. In Member States that perform poorly in this indicator there is a lack of comprehensive media-specific legislation to mandate the disclosure of media ownership information across all media sectors. In addition, the degree of detail of the information available is not sufficient to identify the ultimate or beneficial owner, an issue that is particularly problematic in the digital news sector. Progress towards the implementation of national media ownership databases is expected, in view of the full application of Art. 6 EMFA.
- Tendencies towards consolidation in the media industry continued in the year of the assessment, with several cases under evaluation by competition and/or media authorities (e.g. in France, the Netherlands, and Finland). In Poland, the government stepped into media operations, adding two TV companies to the list of its strategic assets. (see below, in the Political Independence area). At the time of the MPM2025 assessment, eighteen countries had no separate assessment on media mergers to evaluate the impact of media market concentrations on pluralism and editorial independence. Fragmented national regulatory frameworks are evolving, in order to comply with Art. 22 EMFA.
- Digital markets are highly concentrated, and the dominance of the very large online platforms in the digital advertising market continues. In this regard, it must be noted that data collection must often rely on estimates and commercial databases, given the lack of transparent financial reports at country (and also at European) level. Moreover, the absence of standardised systems for measuring online audiences contributes to the opacity of digital markets and further threatens the level playing field.
- The economic relationships between media service providers and digital intermediaries are still characterised by disputes regarding the monetization of media content, and difficulties in copyright protection. In eight EU countries there are no ongoing negotiations between publishers and platforms to remunerate the use of media content.
- The rapid growth of generative AI systems has led many publishers to sign deals with AI companies for the remuneration of media content used to train LLMs (large language models). But these cases are concentrated in the largest European markets: Germany, France and Spain. The vast majority of countries (24) report that there are no ongoing negotiations, or, in the case that there are, these are very limited and problematic. In the countries in which relevant agreements with AI companies have been signed in 2024, these are limited to the mainstream media and not transparent in their economic and legal details.

- Media viability has improved but the market is far from sustainable. While the print market has continued to experience declining revenues and lower circulation numbers in almost every country, television and radio have proven more resilient, in many cases experiencing some growth in revenues. The viability of the journalistic profession is still not good. Even if there were fewer major media closures and lay-offs reported than in past years, the number of employed journalists is below the level of the early 2000s. There are some good examples of countries where governments decided to increase their investment in quality journalism, with a greater focus on digital media, as in past years, but in most cases such subsidies are still not sufficient. While newsrooms experiment with new revenues, most of these are hardly sustainable.
- The medium-high-risk of the indicator of editorial independence shows that, in a weak media market, news media are extremely vulnerable to commercial pressures. Measures that aim to safeguard the integrity of content are still missing in many countries. Disguised advertising remains a problem. Across the countries assessed, there is a worrying number of cases where news media owners have important significant interests in non-media sectors. The disclosure of conflicts of interest is still not a common practice.

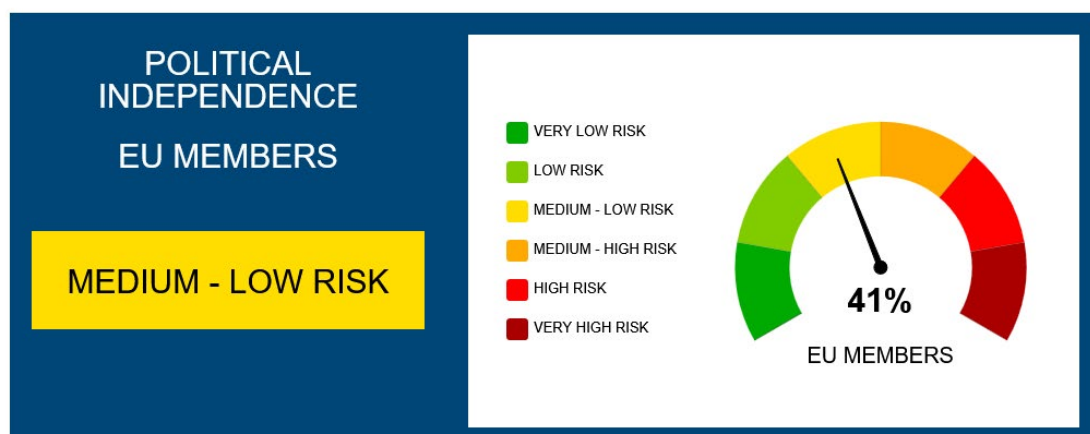
Figure 1.e. Market Plurality area - Treemap ranking of the EU-27



- In the **Market Plurality** area, no country is at low risk, and three countries are at very high risk: Cyprus, Hungary and Romania. For these countries, the alarming result derives from a high level of risk in all the indicators composing the area. Nine countries are at high risk, whereas 14 countries position themselves at me-

dium-high risk, and Germany is the only country in the medium-low band - a result driven by the low risks related to the indicator on transparency of media ownership and to the safeguards of editorial independence from commercial and owners' undue influence. Overall, it must be noted that this area also shows a high degree of uniformity in the results, with the majority of the countries positioned between 60 and 70% of risk level. This effect can be understood as a consequence of the cross-border dimension of the media and the digital markets.

- In the indicator on the *Transparency of media ownership*, six countries score at the high-risk level (Belgium, the Czech Republic, Finland, the Netherlands, Romania and Slovenia), while three countries are categorised in the very high-risk band (Cyprus, Hungary, and Spain).
- When it comes to the indicator on *Plurality of media providers*, twenty countries score at very high-risk, and the remaining seven countries are at high-risk.
- In the indicator on *Plurality in digital markets*, all the countries score high and very high-risk levels, except Germany which presents a medium-high-risk level.
- The results of the indicator on *Media viability* present a wider range of risk scores: eighteen countries can be found in the medium-low or the medium-high range; only the three Baltic countries show a low risk, while Cyprus, Hungary, Ireland, Malta, Romania, and Slovenia are high-risk countries.
- The overwhelming majority of countries (eighteen) score either high or very high risk on the indicator of *Editorial independence from commercial and owner influence*. In twenty-two countries, media owners' economic interests in non-media sectors raise serious concerns.



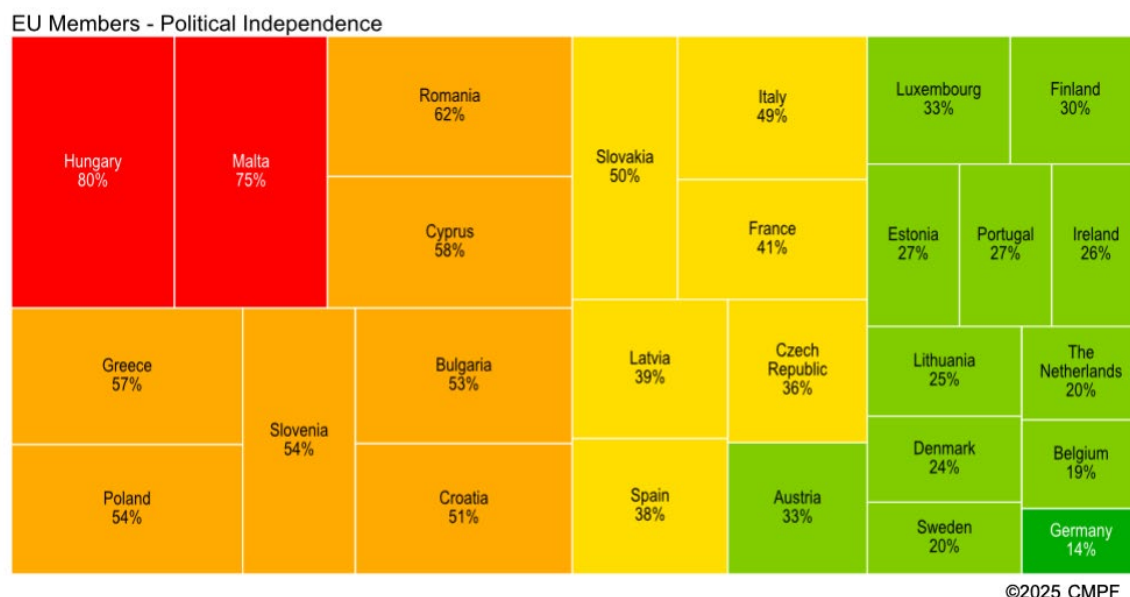
The **Political Independence** indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the state and of political power over the functioning of the media market

and the independence of public service media. In addition, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.

- The 2025 EU results for the **Political Independence** area show the persistence of major instances of control and influence exerted by traditional mechanisms of political capture of the media. This reality is reflected at the area level –with the overall score registering 41%, in the medium-low band.
- Concerns in terms of politicised ownership structures that may affect the political independence of the media and editorial autonomy persist. The newspaper sector is considered the most at risk, in this regard, followed closely by the audiovisual sector. While digital native media are assessed as relatively safer in terms of political control via ownership, some countries are presenting concerns (e.g. Austria, Bulgaria).
- Self-regulatory instruments often lack the power to address or react against external and internal violations and pressures. Self-regulation is assessed as truly effective only in Northern European countries.
- Editorial output is also indirectly affected by the controversial distribution of state money, with the allocation of such resources, especially state advertising, often being linked to politicised ownership structures.
- The MPM2025 results reveal a severe politicisation of governance and funding structures, as well as the mechanisms of European public service media. Sensitive deficiencies are detected, especially regarding regulatory provisions aimed at limiting political ownership, criteria for the allocation of state advertising, PSM governance and funding procedures, as well as the conditions and mechanisms through which political advertising is distributed on online media and platforms.
- In almost all Member States, audiovisual media follows strict regulatory safeguards aimed at securing electoral periods from unbalanced political communication. Such safeguards were generally assessed as sufficient in ensuring a fair and balanced representation of political viewpoints. At the same time, in some countries relevant debate emerged with the political communication of candidates carrying out institutional activities and related risks of imbalances. Furthermore, private media generally proved less equal, if compared to PSM.
- Contrarily, political communication in the online environment raises severe risks, due to the techniques used for issuing online political advertising –especially on social media platforms– and transparency concerns. A generalised lack of regulation continues to hinder improvement in this domain.

- The local dimension is particularly fragile. Many European countries are severely affected by an entrenchment of politicised local ownership and public funding, biasedly directed either in the form of subsidies or institutional campaigning. In some cases, local media are directly owned or funded by the municipality (e.g. Slovakia, Croatia). This generates high concerns in terms of editorial output, but also proves problematic in terms of market distortion.
- Some countries have been notably impacted by the tense geopolitical situation. In Poland, two major audiovisual players were added to the list of strategic entities that are eligible to receive state protection, and will need government consent in the case of ownership change. In Romania, elections were annulled by the Constitutional Court in December 2024 following concerns of foreign interference via social media campaigning.

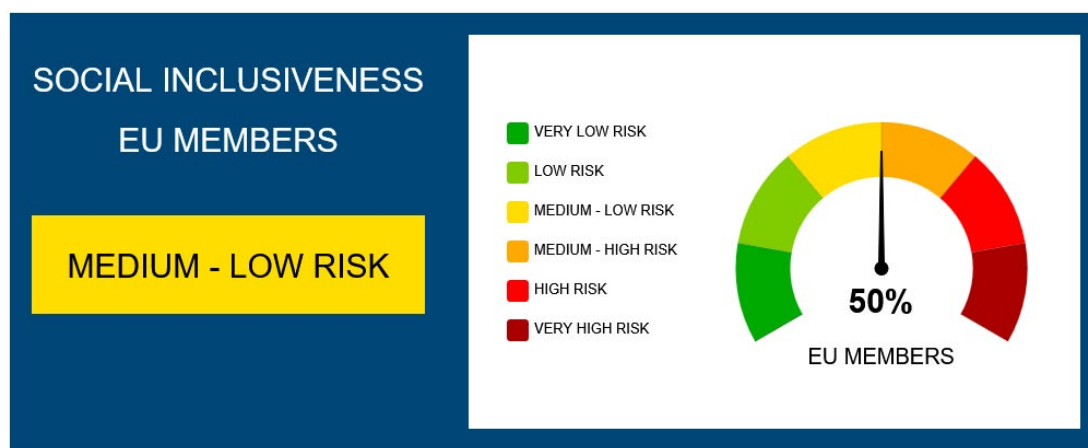
Figure 1.f. Political Independence area - Treemap ranking of the EU-27



- More than half of the EU Member States score between medium-low and high-risk bands, underlying relevant regulatory deficiencies and instances of political influence and control.
- The geographical distribution of risk clearly locates former socialist countries in higher risk bands, compared to Western counterparts –with some exceptions. In Eastern European countries, patterns of control are particularly pronounced and interrelated. A fundamental difference, in comparative perspective, is the quality of the implementation of provisions and standards, and a far higher record of problematic evidence. Conversely, Northern European countries, based on the

data provided, are assessed as being generally free from blatant malpractices, in spite of the lack of hard regulatory provisions aimed at preventing political control.

- As with previous MPM implementations, Hungary and Malta score the worst results. While Malta represents a unique case of the party-media system, Hungary combines a wide range of blatant and more subtle elements that makes the media system almost completely captured by the ruling political party Fidesz.



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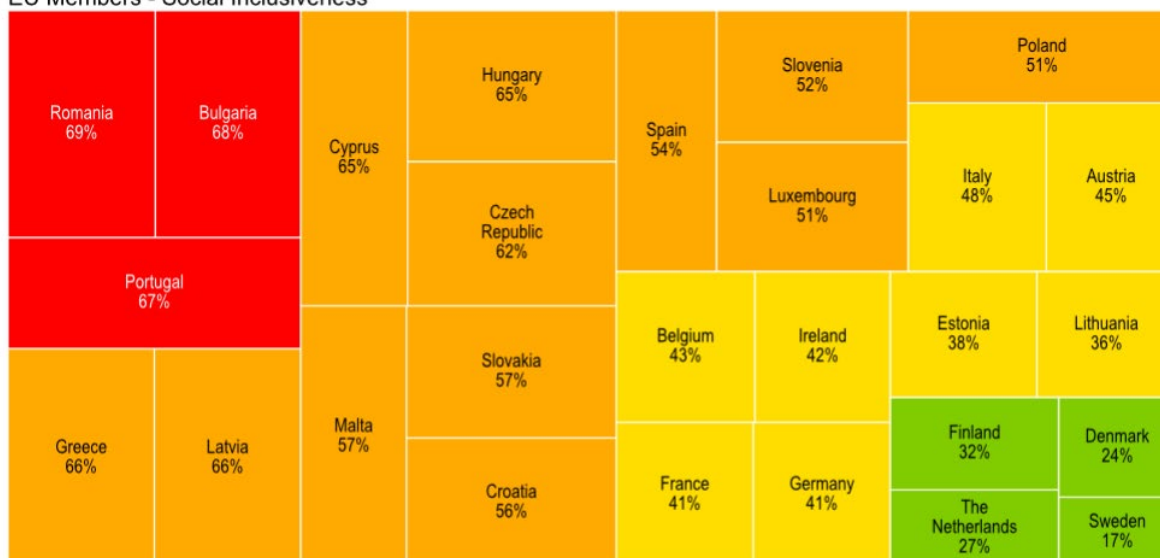
*The **Social Inclusiveness** area focuses on the universal, inclusive and safe access to media, especially by specific groups in society, including minorities, marginalised communities, local and regional communities, women and people with disabilities. It also examines the media literacy environment, as a precondition to inclusiveness.*

- **Social Inclusiveness**, with an average risk assessed at 50%, is still, in comparison with previous rounds of MPM implementations, within the medium-low-risk band although at the border of the medium-high risk. The median is, however, within the medium-high-risk band, reflecting that the situation remains problematic in most countries. Nevertheless, none of the EU Member States scored at the extremes, that is, within the very low or very high-risk bands. This absence of extremes reflects on the one hand, the difficulty of reaching a very low-risk situation given the intrinsic nature of Social Inclusiveness which aims to provide media access and representation to the marginalised groups and fringes of society. On the other hand, the absence of very high-risk scoring countries reflects that all the countries studied are at least providing minimal effort to ensuring a minimum level of inclusivity in media services.
- In line with the average risk score for the area, all the indicators used to assess **Social Inclusiveness** are assessed between medium-low-risk and the medium-high-risk bands, thereby avoiding extremes. This confirms that all EU Member States are making some sort of effort to guarantee basic inclusiveness.

- Universal coverage is guaranteed in most EU countries, although in some cases it is hindered by limited media accessibility for people with disabilities. Although all EU Member States have made some effort over the past years to improve media accessibility in line with art. 34 of the Audiovisual Media Service Directive (AVSMD), minimal standards differ significantly from one country to another and audio-descriptions for people with visual impairments are often left out of these minimal standards.
- Confirming a trend, the representation of women in the media remains the weakest point for most countries in terms of **Social Inclusiveness**. The representation of women in the media has always been one of the main risk factors, ever since the first implementation of the MPM, reflecting both a quantitative and a qualitative deficit (Palmer & Urbániková, 2025).
- A lack of data is a common problem when measuring social inclusiveness, especially for assessing the representation of women and marginalised communities in the media. Of the answers given regarding the representation of women in the media, 17% were coded as no data in the absence of up to date quantitative and qualitative monitoring of gender representation in the media. The percentage reaches 10% for variables on marginalised communities.

Figure 1.g. Social Inclusiveness area - Ranking of the EU Member States

EU Members - Social Inclusiveness

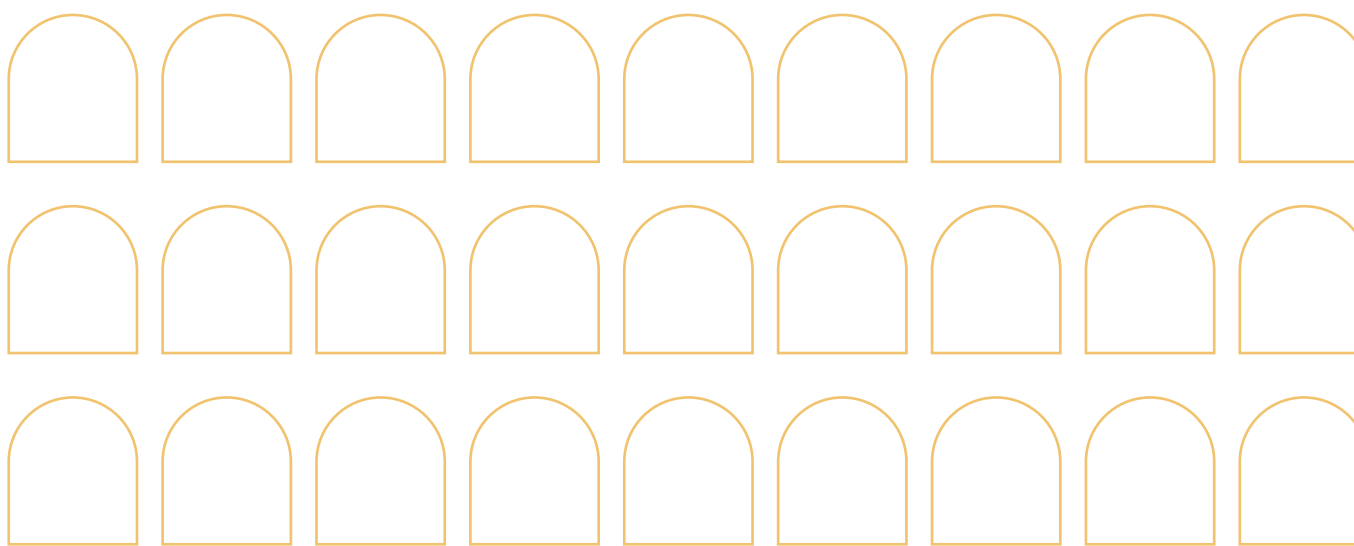


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- The repartition of countries shows clear geographical zones when it comes to the area of **Social Inclusiveness**. Scandinavia and the Netherlands' scores are low-risk, Western European countries tend to score within the medium-low-risk

band, Eastern European countries score within the medium-high-risk band, while Southern European countries present a mixed picture with Italy in the medium-high-risk band and Portugal in the high-risk band.

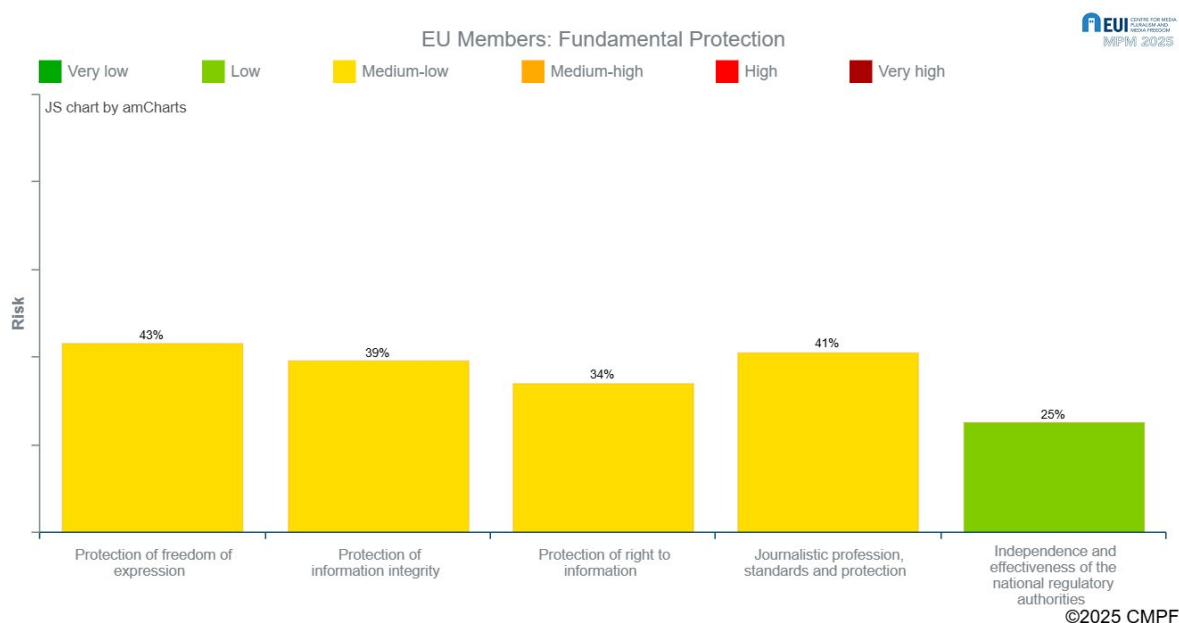
- The good performance of the Scandinavian countries and the Netherlands reflects on the one hand, very comprehensive and up-to-date media literacy policies as well very high levels of media literacy within the population, and, on the other hand, a solid universal coverage of their territory coupled with high media accessibility. However, local media coverage remains a serious source of concern for Denmark, the Netherlands, and Finland, with local media outlets increasingly closing their doors in the absence of sufficient viability.
- Among Eastern European countries, Estonia and Lithuania present a significant medium-low risk and are very close to the low-risk band. These two countries tend to share some common traits with Scandinavian countries, including a strong universal access to media, adequate representation of minorities, and, for Estonia, a very strong media literacy tradition that was extended two years ago to include the country's Russian minorities.
- Portugal is the only Western European Member State to score within the high-risk band. According to Cadima et al. (2025), "the critical scenario is mainly due to significant sustainability issues concerning local media, gender inequality in media management and representation, as well as the scarce presence and stereotypical framing of marginalized communities in media content".
- Romania is the worst performing country in terms of **Social Inclusiveness**. According to Toma et al. (2025), data are lacking to provide a full picture of the situation, echoing the issue of monitoring mentioned earlier. Bulgaria follows suit, reflecting ineffective protection against hate speech amid low media literacy skills and poor results in terms of gender balance and diversity in the media (Spasov et al., 2025).



CHAPTER 2. Fundamental Protection

2.1. In-depth results

Figure a. Fundamental Protection area. Averages per indicator



PROTECTION OF FREEDOM OF
EXPRESSION

MEDIUM - LOW RISK

The Protection of freedom of expression indicator assesses the respect for freedom of expression and the related international standards, the proportionality of balancing freedom of expression and a person or entity's dignity, and the state's obligations to protect journalists from strategic lawsuits against public participation (SLAPPs).

The main international standards for freedom of expression have been recognised in the legal frameworks of all EU countries, but the respect of freedom of expression in

practice varies. Some of the main issues highlighted in the previous MPM reports remain unsolved, namely the fact that defamation remains a criminal offence in many countries, the worrying practice of SLAPPs and a lack of anti-SLAPP regulation. In 21 out of the 32 countries under analysis, defamation is a crime, and in some cases is punishable by imprisonment. Many defamation charges against journalists fall under the characteristic of SLAPPs, scored by MPM researchers as a high-risk issue in 11 EU countries. Among those, a very high risk is detected in Croatia and Hungary (see Focus 3). The EU anti-SLAPP Directive 2024/1069 was enacted on 11 April 2024 and needs to be transposed by the EU Member States by 7 May 2026. In most EU countries this transposition has not yet taken place, except Malta where an anti-SLAPP law was enacted in 2024. As highlighted later in Focus 3, discussions on the transposition are, however, ongoing in several EU countries. It would be desirable that this transposition includes domestic and criminal cases too, considering that the Directive only focuses on cross-border civil lawsuits, while most SLAPPs are domestic and might involve criminal charges.

Also, major geo-political issues such as the ongoing conflicts in Ukraine and Palestine, and the climate crisis, are the basis for restrictions of freedom of speech and assembly. This was the case for example in France, Germany, the Netherlands with regards to the massacre of Palestinian civilians in Gaza; in France, the CGT (General Confederation of Labour) union leader Jean-Paul Delescaut was sentenced to one year imprisonment for “apology of terrorism” after having published and distributed a pro-Palestinian flyer (Ouakrat & Bienvenu, 2025). The war in Ukraine has also been causing restrictions to freedom of expression, especially in the EU countries that share a border with Ukraine. For example, in Latvia, restrictions on the broadcasting of programmes in Russian language by the local PSM will come into force from 2026, and Russian and Belarusian journalists in exile are often considered to be a threat by the host country (Rožukalne & Skulte, 2025)¹. Meanwhile in Poland, citizens- including journalists- are banned from entering certain areas on the border with Belarus.

PROTECTION OF INFORMATION INTEGRITY

MEDIUM - LOW RISK

The Protection of information integrity indicator assesses the respect of freedom of expression online by platforms, the respect of freedom of expression online by public authorities and the protection against disinformation and Foreign Information Manipulation and Interference (FIMI).

Regarding the sub-indicator focusing on respect of freedom of expression online by platforms, the MPM country teams documented cases involving journalists, indicating

¹ Revelations by the NGO Access Now and investigative partners have uncovered that at least seven exiled Russian and Belarusian journalists had their phones infected with spyware (CoE, 2025, p. 53).

that platforms do not always moderate their content effectively, potentially infringing on freedom of expression rights and, once applicable, Article 18 EMFA.² Furthermore, it is also shown that the reporting of VLOPs on their own content moderation strategies is often neither fully transparent nor meaningful, which hindered the MPM country teams' ability to accurately assess whether content moderation respects freedom of expression. Several countries — including the Czech Republic, Greece, Ireland, Romania, Italy, Denmark, and Latvia — report that moderation practices related to ongoing conflicts, notably the wars in Ukraine and Palestine, have resulted in unfair content suppression, often without notifying users. This indicates that, despite the new DSA obligations, the practice of “shadowbanning” remains central to the moderation strategies employed by VLOPs. Overall, the average risk level for this sub-indicator is medium-low.

With regards to the respect for freedom of expression online by public authorities, most of the Member States register low or very low risk levels. However, in Cyprus, Spain, and Croatia, public authorities fall short of adequately reporting their content moderation requests. Bulgaria stands out as a notable exception, where multiple incidents have raised concerns about politically motivated censorship and potential efforts by government actors to suppress dissent (Spasov et al., 2025).

Finally, considering the protection against disinformation and FIMI, the MPM data collection reveals an increase in coordinated disinformation and influence operations, raising concerns that the intensification of information warfare could justify restrictive governance measures, potentially threatening fundamental rights. A paradigmatic case is the Sovereignty Protection Act from Hungary, under which the Office for the Protection of Sovereignty targeted independent media outlets like the investigative portal Átlátszó.hu (Bleyer-Simon et al., 2025). When it comes to national responses to the threat of FIMI and disinformation, half of the countries report not having a public strategy against disinformation, and twelve countries have no measures to identify and address FIMI. All EU members are covered by local hubs of the European Digital Media Observatory (EDMO), and every country has independent fact-checking organisations, but many are considered underfunded.

PROTECTION OF RIGHT TO INFORMATION

MEDIUM - LOW RISK

The Protection of right to information indicator focuses on the legal protection of the right to information and on the protection of whistleblowers.

The indicator on *Protection of right to information* is the second least problematic in the Fundamental Protection area, after the indicator on *Independence and effectiveness of*

² For a full list of cases, see Mapping Media Freedom (2025) ‘[Report it](#)’ database.

national regulatory authorities. The worst performing countries within this indicator are Cyprus, Malta and Hungary, respectively scoring at the medium-high, high, and very high-risk bands. In Hungary, the legal framework of the right to information deteriorated in 2024 due to changes in the law that further narrowed the scope of access to data of public interest. In addition, authorities have made it difficult for journalists to access information through interviews or by accessing relevant people. An emblematic situation from 2024 was the denial of accreditation of international news outlets at Orbán's State of the Nation speech and the Conservative Political Action Conference (CPAC) conference, and the Presidential Office's refusal to answer journalists' inquiries (Bleyer-Simon et al., 2025).

Cyprus and Malta also report flaws in their access to information laws. For instance, in Malta, the law includes several exemptions, and citizens are not entitled to request access to documents held by various state departments (Palmer & Bleyer-Simon, 2025). In Cyprus, the law includes several exemptions that are often interpreted broadly, frequently resulting in denials, gaps, and omissions that undermine the fulfilment of the right to information (Christophorou & Karides, 2025).

Regarding whistleblower protection, the transposition of Directive (EU) 2019/1937 has not fully ensured effective protection or proper handling of cases in several jurisdictions, for instance in Poland (Klimkiewicz, 2025) and Cyprus (Christophorou & Karides, 2025). Even in Member States where the law clearly defines the status and level of protection for whistleblowers, such as in France, those who report on public interest issues still pay a heavy price, according to Ouakrat & Bienvenu (2025).

JOURNALISTIC PROFESSION, STANDARDS AND PROTECTION

MEDIUM - LOW RISK

The Journalistic profession, standards and protection indicator comprises six sub-indicators, which describe the risks resulting from: (i) journalists' working conditions; (ii) physical safety; (iii) life safety; (iv) digital safety; (v) the protection of journalistic sources and related issues due to the illegitimate surveillance of journalists; and (vi) impunity for crimes against journalists.

The highest risks detected consider journalists' digital safety, followed by the problematic working conditions of journalists and by the risks to their physical safety. Three prominent issues emerge: i) online harassment and surveillance of journalists covering sensitive and polarizing topics such as environmental and war-related issues (especially Gaza and Ukraine), corruption and elections; ii) deteriorating working conditions of journalists, namely low salaries and weak or absent social security schemes; iii) physical threats and temporary detentions of journalists, which are also increasing in Western countries (read more on this in Focus 2).

The working conditions of journalists, especially local journalists and freelancers (Verza et al., 2024), remain poor throughout Europe. Large media houses and PSMs are also cutting jobs³, and the use of AI in journalism poses further threats for newsrooms' staffing⁴. Due to these labour issues, a decreasing number of young people are joining the profession. Economic instability jeopardises the quality of reporting, further increasing journalists' vulnerability to external pressures. Journalistic organizations are rarely effective in advocating for better working conditions and editorial independence. However, recent progress includes both the renewal of the collective contract for journalists in Italy (Vigevani et al., 2025) and a new collective labour agreement in Greece (Papadopoulou & Angelou, 2025).

Verbal attacks and smear campaigns are on the rise, often involving political figures, as seen in Italy, Belgium and Croatia. The situation in Slovakia is particularly concerning, with Prime Minister Robert Fico publicly attacking the media and the government refusing to answer questions from mainstream journalists (Urbániková, 2025). Of particular concern were the numerous death threats received by journalists in 2024, across the EU.⁵

Journalists working on sensitive topics are also subject to online harassment (hate speech, doxing, spoofing, hacking attacks, and so on) and illegitimate surveillance. Impunity is particularly high for online crimes, where the source of the threat is often more difficult to trace. Physical attacks on journalists were related to their reporting on public protests and elections, as well as environmental issues, war-related topics (especially Gaza and Ukraine), and corruption. Precautionary arrests of journalists took place in 2024, in France, Greece, Poland, among others.

Mediocre working conditions, increasing harassment, and increasing tasks to meet the pressures of the continuous 24-hour news cycle, impact the mental wellbeing of jour-

3 In Austria, 956 journalists were registered as unemployed in December 2024. This represents an increase of 19.5% compared to December 2023 (Seethaler et al., 2025). In Croatia, at HRT (the Croatian PSM), more than 700 workers are paid less than 758 euros per month, and 1,300 workers have incomes lower than 904 euros per month. In 2024, the HRT General Director announced a "new strategic direction", announcing that 30% of the PSM workforce would be laid off. The HRT technical union asserted that this "New Direction" was adopted contrary to the obligation to consult with the Workers' Council, which is why it initiated the submission of a misdemeanour report to the labour inspectorate (Bilić, 2025). In Italy, the average income for freelance journalists with VAT registration is €16,000 gross per year. Many freelancers and newspaper contributors receive compensation below the subsistence threshold, with some articles paid just a few euros (Vigevani et al., 2025). In its 2024 report, the Madrid Press Association (APM) reported that more than half of hired journalists work more than 40 hours a week. 75% of the surveyed journalists agree that the lack of quality working conditions is worsening the quality of the reports they produce. Almost 70% believe that journalists' mental health is deteriorating partly due to job insecurity, a rate that is higher in the case of women. Nearly a third make less than 1500 euros per month (quoted in Suau-Martinez et al., 2025).

4 In October 2024, OFF Radio Kraków (PSM) experimented with a radio programme that was almost entirely created by Artificial Intelligence. A few weeks earlier, the station had laid off its human hosts (tvn24.pl, 2024). This move sparked criticism, especially after the station broadcast an "interview" by a non-existent journalist with the voice of Wisława Szymborska (Nobel Prize for literature) generated by AI (Klimkiewicz, 2025).

5 See Civil Liberties for Europe, 2025 and MFRR, 2024.

nalists⁶. Women and LGBTQ+ journalists are particularly vulnerable to this strain due to structural factors, including workplace culture and societal attitudes. However, systematic data and monitoring on the impact of this on these more vulnerable groups are missing in most European countries.

INDEPENDENCE AND EFFECTIVENESS OF THE NATIONAL REGULATORY AUTHORITIES

LOW RISK

The Independence and effectiveness of National Regulatory Authorities indicator focuses both on media authorities and, from the 2025 edition of the MPM, authorities designated as Digital Services Coordinators (DSCs) under the Digital Services Act (DSA)⁷. It focuses on their competencies and accountability, their independence from political influences, and the adequacy of their budget as well as technical and human resources.

Even though at the EU level the overall risk remains low (25%), significant variation persists among Member States, with high-risk scores in Greece and Hungary, medium-high-risk scores in Malta, and medium-low-risk scores in Bulgaria, Cyprus, Poland, Portugal, Romania, and Slovenia.

The greatest representation of medium and high-risk countries is related to independence from political influences of national authorities. Hungary presents a very-high risk in this area, as the media authority NMHH, also recently appointed as DSC, is heavily politicized, operates with 9-year mandates, preserves the biased allocation of radio frequencies, and has the tendency of only approving pro-government mergers (Bleyer-Simon et al., 2025). A very-high risk was assessed for Greece as well, where major channels were repeatedly acquitted of malpractice despite confirmed violations. The number of decisions issued by the regulator in Greece has halved compared to the previous period (Papadopoulou & Angelou, 2025). In Bulgaria, persistent appointment delays and the failure to elect a permanent CEM chair also raises concerns (Spasov et al., 2025). In Poland, the media authority- KRRiT- still tied to the former government- froze the PSM's funds collected from licence fees and was accused of blocking broadcasters' licences and imposing biased sanctions (Klimkiewicz, 2025). In the Czech Republic, the DSC's structure—namely, the fact that appointed members are removable by government—also raises concerns (Štetka et al., 2025).

As to the assessment of the competencies and accountability of NRAs, despite some

⁶ For example, a survey run by AEJ, the Association of European Journalists (AEJ) Bulgaria found that 80% of the respondents experience stress “often” and “sometimes”. Reporting events that cause the greatest levels of stress include: cruelty to children, adults and vulnerable groups (31.6%), wars and terrorist attacks (30.6%), and domestic violence (25.7%). Of those surveyed, 83.5% would like to be provided with professional psychological help (Spasov et al., 2025).

⁷ The list of designated DSCs can be found here: <https://digital-strategy.ec.europa.eu/en/policies/dsa-dscs#1720699867912-1>.

positive developments, disparities in capacity as well as enforcement powers continue to impact the effectiveness of media authorities. In Luxembourg, for example, ALIA's fines remain limited to €25,000 (Kies & Lukasik, 2025). Interesting examples of relevant sanctioning powers can be found in Ireland and Italy, where the NRAs can fine VLOPs for 10% and 6% of their global annual turnover respectively. Best practices emerge in Austria, where KommAustria ensures transparency through public consultations with different stakeholders and the disclosure of decisions (Seethaler et al., 2025).

Finally, considering the adequacy of budget, human and technical resources of such authorities, gaps persist even in low-risk scoring countries. Indeed, in France, ARCOM's responsibilities have expanded significantly, even though its budget remains unchanged (Ouakrat & Bienvenu, 2025). Similarly, in the Netherlands the EC launched infringement proceedings in 2024 due to delays in equipping the ACM with the necessary resources to effectively perform its role as DSC.

EMFA insight - Independence of national regulatory authorities (Art. 7)

Media regulatory authorities are increasingly being entrusted with new tasks, especially regarding the enforcement of new EU regulations acting on the digital public sphere (EMFA, the DSA, the AI Act) at a national level. As provided by art. 7 EMFA, the following conditions are necessary for the effective implementation of the Regulation:

- **An adequate budget, as well as adequate technical and human resources (Art. 7(3) EMFA).** While most EU countries nominally comply, implementation raises concern. This criterion is unmet, for example, in Luxembourg, where ALIA is expected to oversee hundreds of outlets with minimal staff (Kies & Lukasik, 2025). In France, ARCOM's responsibilities have expanded significantly, even though its budget remained the same (Ouakrat & Bienvenu, 2025). Similarly, in Slovenia, the Mass Media Act broadened the mandate of the media authority, without a parallel increase in budget and human resources (Milosavljević & Biljak Gerjevič, 2025).
- **Independence from political and economic pressures (Art. 7(2) EMFA):** While the MPM shows a significant variation in political independence of the NRAs, EMFA implementation would require higher standards of independence. Concerns in this regard can be found in Hungary, Greece, Bulgaria, and Poland, as mentioned above. A worrying event in Italy is related to the 2024 rules concerning the RAI's coverage of the EU elections' campaign: the Parliamentary Oversight Committee on RAI (Italian PSM), where the governmental coalition holds majority, issued a resolution enabling potential for an overrepresentation of members of the government in the PSM during the 2024 EU elections' campaign. In Slovakia, the proposed shift from having a collegial media authority to a monocratic one highlighted potential future discrepancies with the levels of independence required for compliance with EMFA requirements (Urbániková, 2025).

2.2. Three focuses on Fundamental Protection

2.2.1. Focus on Platform Content Moderation: Emerging Remedies and Advanced Online Harassment

The year 2024 marked the implementation phase of the Digital Services Act (DSA). During this year, Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), as designated by the European Commission in April 2023⁸, published their transparency reports for the first time, covering the full year. Additionally, new mechanisms aimed at enhancing transparency and accountability in content moderation began to take shape (see Table 1 below). The most relevant developments — which also emerge from the MPM data collection — include:

- (i) the appointment of Digital Service Coordinators (DSC), who are mandated to oversee the enforcement of the DSA at national level⁹. By the end of 2024, all Member States had appointed their DSCs, although only a few—such as Ireland and Portugal—had initiated investigations into VLOPs’ practices;
- (ii) the introduction of the DSA Transparency Database¹⁰, an EU-managed platform where VLOPs are required to upload “Statements of Reasons” — clear and specific justifications for a series of content restrictions imposed on the grounds that the information provided by users constitutes illegal content or is incompatible with their terms of service;
- (iii) the creation of independent out-of-court dispute settlement bodies, which should provide users with a cost-effective and impartial avenue to challenge content moderation outcomes¹¹, in addition to the already existing right to appeal content moderation decisions through internal complaint-handling mechanisms;
- (iv) the first publication of systemic risk¹² assessments and corresponding mitigation measures, aimed at addressing threats to civic discourse, electoral processes, public security, and fundamental rights—including freedom of expression and access to information.

8 For an updated list of VLOPs and VLOSEs, see: <https://digital-strategy.ec.europa.eu/en/policies/list-designated-vlops-and-vloses>.

9 For an updated list of ‘Digital Service Coordinators’, see: <https://dscdb.edri.org>.

10 For the transparency dashboard, see <https://transparency.dsa.ec.europa.eu/>. For the search of ‘statements of reasons’, see <https://transparency.dsa.ec.europa.eu/statement>.

11 For an updated list of ‘out-of-court dispute settlement bodies’, see: <https://digital-strategy.ec.europa.eu/en/policies/dsa-out-court-dispute-settlement>.

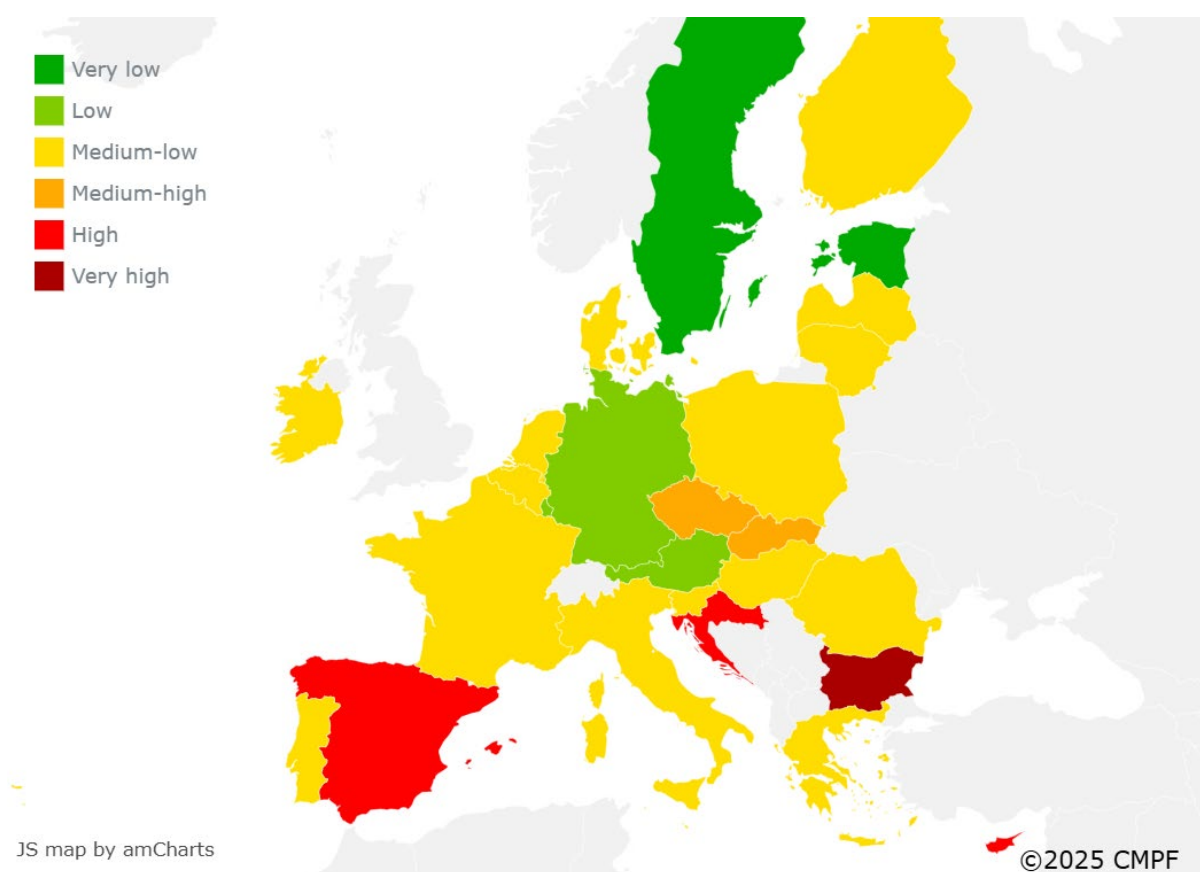
12 ‘Systemic risks’ are not expressly defined in the DSA, but they are widely considered as risks that impact society at large. They include, among other things, content that is illegal and that may adversely affect fundamental rights or impact electoral integrity. See Torraco, R. M. (2025, May 27). Risk in the Digital Services Act and AI Act: implications for media freedom, pluralism, and disinformation. <https://cmpf.eui.eu/risk-in-the-digital-services-act-and-ai-act-implications-for-media-freedom-pluralism-and-disinformation/>

Table 2.1. Key Provisions on Content Moderation in the EU Digital Services Act.

Article	Title	Description
14	Terms and conditions	Platforms must explain how they moderate content ,applying any restriction in a transparent and non-discriminatory manner and with due regard for fundamental rights such as the right to freedom of expression and the freedom and pluralism of the media.
15	Transparency reporting obligations	Platforms shall make clear ,easily comprehensible reports on any content moderation that they engaged in during the relevant period publicly available at least once a year .Large platforms have additional obligations) Article,(42 including ,amongst others ,reporting the risk assessment pursuant to Article 34and the specific mitigation measures put in place pursuant to Article.35
16	Notice and action mechanisms	Platforms must put in place easy-to-access and user-friendly mechanisms to allow any individual or entity to notify them of the presence on their service of specific items of information that they consider to be illegal content.
17	Statement of reasons	Platforms must provide” statements of reasons ,“which means producing clear and specific justifications for a series of restrictions imposed on the grounds that the information provided by the recipient of the service constitutes illegal content or is incompatible with their general conditions.
20	Internal complaint-handling system	Platforms must provide access to an effective internal complaint-handling system that enables individuals or entities to lodge complaints ,electronically and free of charge ,against the decision taken by the platform upon the receipt of a notice or against the subsequent decisions taken by the platform.
21	Out-of-court dispute settlement	Users must be entitled to select any certified out-of-court dispute settlement body in order to resolve disputes ,including complaints that have not been resolved by means of the internal complaint-handling system referred to in Article.20
22	Trusted flaggers	Trusted flaggers are professionals who have particular expertise and competence in tackling illegal content .Platforms must take the necessary technical and organisational measures to ensure that notices submitted by trusted flaggers are given priority and are processed and decided upon without undue delay.
34	Risk assessment	Large platforms must diligently identify ,analyse and assess any systemic risks in the Union stemming from the design or functioning of their service and its related systems ,including their content moderation systems.
35	Mitigation of risks	Large platforms must put in place reasonable ,proportionate and effective mitigation measures ,tailored to the specific systemic risks - such as the dissemination of illegal content through their services and any actual or foreseeable negative effects on civic discourse and electoral processes ,and for the exercise of fundamental rights - adapting ,amongst others ,content moderation processes.

These developments mark a shift from opaque self-regulation to a co-regulatory regime with enforceable transparency standards (see Husovec, 2024). While the resulting availability of data was expected to enhance the ability of country teams to assess risks more effectively, paradoxically, it has also contributed to a general increase in perceived risk. In 15 out of the 27 countries analysed, an increase in risk from MPM2024 was observed for the sub-indicator related to the respect of freedom of expression online by platforms, which assesses whether online platforms moderate content with respect to freedom of expression and report their actions in a transparent and meaningful way, as well as the availability of dispute resolution mechanisms to address potential violations of freedom of expression.

Fig. 2.b: Respect of freedom of expression online by online platforms - map of risks per country.



One of the primary instruments for ensuring transparency in content moderation is the semi-annual transparency reporting obligation imposed on VLOPs and VLOSEs (Art.42). These reports are intended to provide granular information on the number of content takedowns, the use of automation, error rates, and how terms of service are enforced.

The country teams, however, have highlighted significant limitations in the effectiveness of these reports for evaluating risks to freedom of expression for the year 2024.

First, the current level of data aggregation in these reports impedes meaningful analysis—even for experts. Key indicators—such as average monthly active users, error rates in content moderation, and the distribution of statements of reasons across content categories—were rarely disaggregated by country. This obscured national-level dynamics and limited MPM researchers' ability to contextualize risks to freedom of expression and media pluralism, as reported by most country teams. Second, several metrics remain inherently ambiguous and resist straightforward interpretation. For instance, the ratio of automated versus manual moderation cannot be reliably used as a proxy for the quality or legitimacy of content governance practices. Similarly, figures on removal orders from authorities may reflect either proactive enforcement against illegal content or, conversely, overreach and potential censorship. Finally, a further challenge is related to comparability. At present, VLOPs and VLOSEs apply different internal standards, policies, and interpretations of their reporting obligations, resulting in significant inconsistencies across reports. While some platforms provided relatively meaningful information, others submitted more partial data, making longitudinal and cross-platform comparisons difficult.

Despite these identified challenges, some noteworthy trends have emerged from the data collection. For several years, platforms have been criticised for allocating insufficient human resources to content moderation, especially for languages other than English—a problem that has now been made more evident through the DSA transparency reports. Many countries, particularly smaller and Eastern European countries, report extremely low numbers of content moderators. The least served countries in this respect include Bulgaria, the Czech Republic, Croatia, Estonia, Latvia, Lithuania, Greece, Hungary, Ireland, Malta, Romania, Slovakia, and Slovenia.

Beyond the raw numbers, assessing the quality of content moderation would require examining several other critical aspects such as the qualifications, the training and the support—particularly psychological—of the human resources dedicated to content moderation, as well as the methodology used to compute the number of individuals in this role. All of this is mandated to be included in the new transparency reporting template, which will apply as of 1 July 2025.¹³ Disaggregated data—such as the number of monthly active users or the accuracy of automated content moderation per country—is also expected in future reports. While acknowledging that this is a transitional phase, in which essential monitoring tools are still being developed and have not yet reached full operational effectiveness, the need for higher transparency and insights into content moderation practices seem to have contributed to the risk increase across the EU in

13 See European Commission. (2024). Implementing Regulation laying down templates concerning transparency reporting obligations under the Digital Services Act. <https://digital-strategy.ec.europa.eu/en/library/implementing-regulation-laying-down-templates-concerning-transparency-reporting-obligations>

2024. This early implementation stage is also reflected in the establishment of independent out-of-court dispute settlement bodies, a key innovation introduced by the DSA to strengthen users' access to redress mechanisms. As of 2024, only six bodies have been officially certified across the EU: ADROIT (accepting complaints in various EU languages), User Rights GmbH (German and English), Online Platform Vitarendező Tanács (Hungarian), the Appeals Centre Europe (any language spoken in the EU), RTR-GmbH (German), and the ADR Centre (Italian and English). It should be noted, however, that ADROIT, a Maltese body, does not deal with social media platforms; its areas of expertise include booking services, shopping platforms, and gaming (Palmer & Bleier-Simon, 2025). The Hungarian body *Vitarendező Tanács*, by contrast, is not an independent body, as required by the DSA, but an institution that is directly operated by the media authority NMHH (Bleier-Simon et al., 2025). While major languages are each covered by at least one body, only the Appeals Centre Europe provides services in all EU languages. This limitation may further exacerbate existing linguistic inequalities in content moderation. More generally, there is currently no available data to assess the effectiveness of these bodies, although evaluation reports are expected in 2025.

While the DSA rules aim to introduce significant advancements in platform accountability, the extent to which they effectively address the "opinion power" exercised by VLOPs remains debatable (see Reviglio et al., 2025). This limitation became particularly evident in the moderation practices surrounding content related to ongoing conflicts, notably the wars in Ukraine and Palestine. Findings from the MPM indicate a potential imbalance: while Russian propaganda has usually been subject to more proactive moderation, user-generated pro-Palestinian content has been often subject to suppression without clear justification. Evidence of excessive moderation of speech has been reported by several countries, including the Czech Republic, Greece, Ireland, Romania, Italy, Denmark, Latvia. Meta, in particular, has faced criticism from international human rights organisations, such as Human Rights Watch¹⁴ and Access Now¹⁵, for its often inaccurate and unfair moderation regarding the conflict in Gaza, particularly when the content is critical of Israel. This situation is especially concerning in light of warnings from international observers about the severe risks faced by journalists covering this conflict—including killings, injuries, threats, detention, and cyber harassment¹⁶—and the disproportionately aggressive military response by Israel, which has already resulted in the deaths of over 50,000 Palestinians, including more than 14,500 children (UNESCO, 2025).

Despite widespread anecdotal evidence, MPM2025 does not indicate systematic censorship on the part of platforms. Nonetheless, concerns persist about the legitimacy of plat-

14 Brown, D. (2024, September 18). Meta's Oversight Board Rules 'From the River to the Sea' Isn't Hate Speech. <https://www.hrw.org/news/2024/09/18/metas-oversight-board-rules-river-sea-isnt-hate-speech>.

15 Fatafta, M. (2024, February 19). It's not a glitch: how Meta systematically censors Palestinian voices. Access Now. <https://www.accessnow.org/publication/how-meta-censors-palestinian-voices/>.

16 Committee to Protect Journalists. (2023, October 13). Journalist casualties in the Israel-Gaza war. <https://cpj.org/2023/10/journalist-casualties-in-the-israel-gaza-conflict/>.

forms' influence on public discourse, particularly when visibility remedies are employed. These notably include "shadowbanning"—the covert suppression or reach reduction of content or accounts without user notification. One example of this practice was illustrated by a 2024 ruling from the Amsterdam District Court, concluding that X (formerly Twitter) wrongfully engaged in the shadowbanning of a man commenting on a law on child abuse in October 2023 (De Swert et al., 2025). The court held that X violated Articles 12 and 17 of the DSA by failing to provide a clear and central point of contact and by not offering the required justification for restricting visibility. Similarly, in June 2024, the Court of Appeal in Ghent ordered Meta, the parent company of Facebook, to pay €27,279.03 in damages to a Flemish Member of the European Parliament. The compensation covered additional advertising costs incurred by the politician after his Facebook page was subjected to a shadowban (Wauters & Kuczerawy, 2025). While in theory the DSA prohibits shadowbans (Leerssen 2022), these remain integral to the moderation strategies employed by VLOPs. What makes this practice particularly problematic is that, to evade detection, platforms can downgrade items gradually over time rather than instantaneously, making it appear as a mere algorithmic outcome, leaving ongoing suspicions and allegations of shadowbanning unsolved.

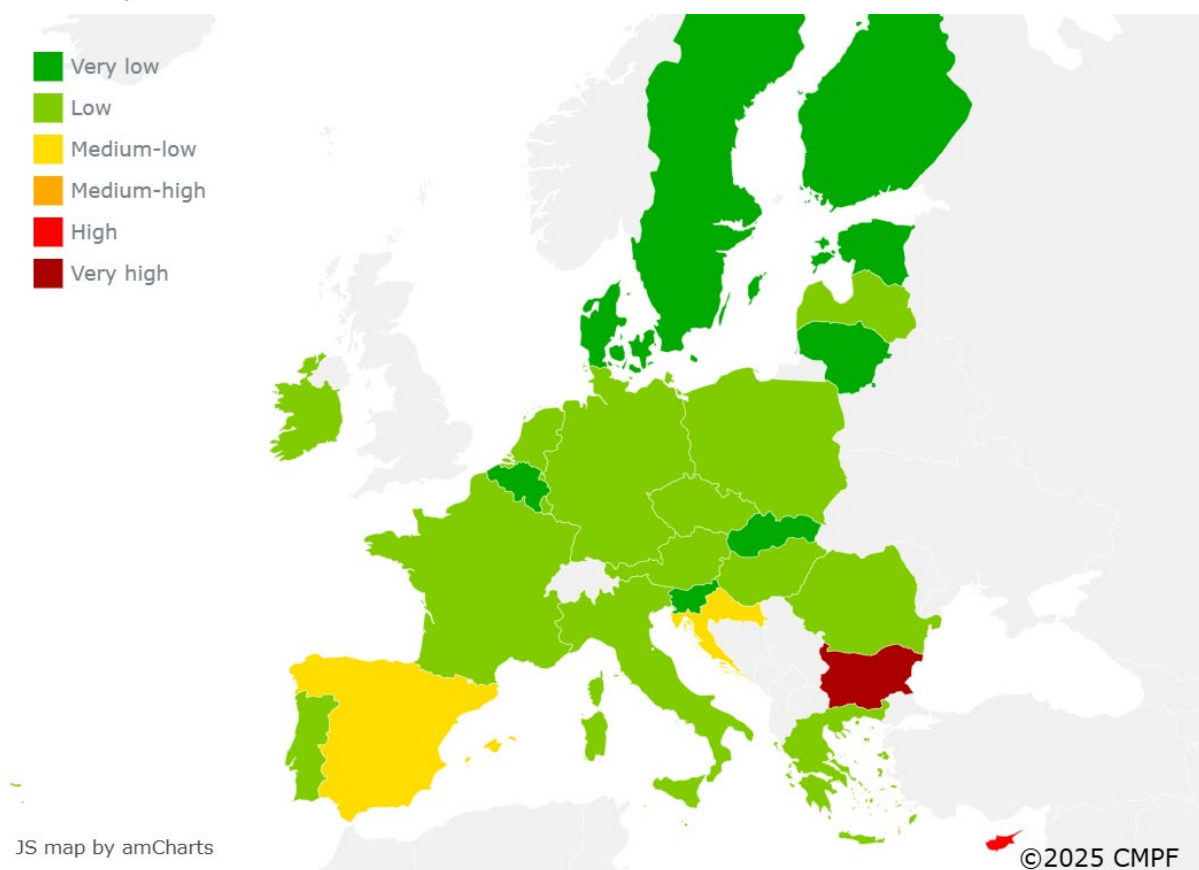
Another concern is related to the moderation of content disseminated by news media and journalists. Anecdotal evidence collected during the research process suggests that platform responses to complaints are, at times, selective. The MPM country teams report the data of Mapping Media Freedom's, which documents several cases involving journalists and indicating that platforms, occasionally, do not always moderate their content in a diligent, objective and proportionate manner, infringing on freedom of expression rights.¹⁷ Once Article 18 of the EMFA becomes applicable, this would constitute an infringement of its 'media privilege' provision (Brogi et al., 2023; Cesarini et al., 2023). This refers to a mechanism that allows media service providers (MSPs) to self-declare their editorial responsibility and compliance with applicable regulatory frameworks before VLOPs. VLOPs, in turn, are required to assess these declarations and, under certain conditions, notify MSPs of their intention to moderate their content and give them the opportunity to contest the decision before it is implemented. The MPM researchers did not report the existence of comparable privileges for media actors in relation to online intermediaries prior to the EMFA. In the vast majority of countries, available data is not sufficient to provide a reliable assessment of the content moderation practices of VLOPs regarding news media. Further empirical research is therefore necessary to determine whether content moderation mechanisms align with legal safeguards, and whether decisions are fair, proportionate and effective.

Regarding content moderation requests from authorities, public authorities in most EU countries generally appear to refrain from arbitrary practices such as filtering, monitor-

¹⁷ Mapping Media Freedom (2025) ['Report it'](#) database.

ing, blocking, or removing online content. However, one notable exception is Bulgaria, where several controversial takedown requests were issued by public authorities in 2024 (Spasov et al., 2025). In September, a video posted by the popular YouTube creator Stanislav Tsanov—featuring critical commentary on politician Delyan Peevski—was removed following a review by the Bulgarian Prosecutor’s Office. One month earlier, a satirical website that mocked Peevski’s political project was taken offline by its hosting provider after an intervention by the Ministry of the Interior. Taken together, these incidents have fuelled concerns about politically motivated censorship and potential attempts by government actors to silence dissent. Finally, in higher-risk countries such as Cyprus, Spain, and Croatia, public authorities do not publish reports on their interactions with platforms or provide clarity on the grounds for their content moderation requests (see Figure 2.c).

Fig. 2.c: Respect of freedom of expression online by public authorities - map of risks per country



In this context, Foreign Information Manipulation and Interference (FIMI) poses unique challenges for content moderation. Unlike generic misinformation or user-generated harmful content, FIMI campaigns are often state-sponsored, highly coordinated, and are

deliberately designed to evade detection by exploiting platform algorithms and networks of fake accounts. A rising number of coordinated disinformation and influence operations have emerged, many of which originate from Russia.¹⁸ It is well-documented that prior to the European Parliament elections, the Portal Kombat (or Pravda) network was active in 19 EU countries.¹⁹ This Doppelgänger operation created fake websites mimicking established media in at least five EU languages.²⁰ These campaigns employ an evolving arsenal of techniques, including the cloning of official government websites, the use of troll farms, the creation of fake social media profiles, and the deployment of deepfake technologies. A telling case of alleged foreign influence and propaganda in this context is Romania's presidential election. A report submitted to the Romanian National Defense Council (CSAT) claimed that influencers were paid to post content promoting the candidate Calin Georgescu on TikTok (Toma et al., 2025). These findings were subsequently cited by the Constitutional Court in its decision to annul the results of the first round of the presidential election (Curtea Constituțională a României, 2024 cited in Toma et al., 2025). The European Commission also opened formal proceedings under the DSA against TikTok, focusing on the management of risks to elections and civic discourse in relation to recommender systems and political advertising policies.²¹ As the investigation is still developing, no conclusive evidence has so far been found linking Georgescu's campaign to foreign state actors, despite suspicions of Russian interference.

Against this backdrop, another serious concern is that action against FIMI and disinformation is, at times, disproportionate, and may limit freedom of expression. There are even cases when the rhetoric of national sovereignty is invoked to legitimise censorship and authoritarian control. A striking example is the Sovereignty Protection Act from Hungary, under which the Office for the Protection of Sovereignty became operational in 2024 and has already targeted independent media outlets like the investigative portal Átlátszó.hu (Bleyer-Simon et al., 2025). The presidential office accused Átlátszó of acting in accordance with foreign interests, particularly those of the United States and the European Union, portraying transparency and anti-corruption efforts as tools of political influence and external intervention²².

18 Counter Disinformation Network (2025) Fool Me Once: Russian Influence Operation [Doppelganger Continues on X and Facebook](https://alliance4europe.eu/wp-content/uploads/2024/09/CDN-Report--Fool-Me-Once--Russian-Influence-Operation-Doppelganger-Continues-on-X-and-Facebook---September-2024.pdf). <https://alliance4europe.eu/wp-content/uploads/2024/09/CDN-Report--Fool-Me-Once--Russian-Influence-Operation-Doppelganger-Continues-on-X-and-Facebook---September-2024.pdf>.

19 VigiNum (2024). Portal Kombat. A structured and coordinated pro-Russian propaganda network. https://www.sgdsn.gouv.fr/files/files/20240212_NP_SGDSN_VIGINUM_PORTAL-KOMBAT-NETWORK_ENG_VF.pdf

20 EUvsDisinfo (2024). Doppelganger strikes back: FIMI activities in the context of the EE24. <https://euvsdisinfo.eu/uploads/2024/04/EEAS-DataTeam-TechnicalReport-FINAL.pdf>

21 https://ec.europa.eu/commission/presscorner/detail/en/ip_24_6487

22 DailyNews. (2024, December 16). Hungarian Sovereignty Protection Office flags another dangerous organization allegedly serving US Interests. <https://dailynewshungary.com/sovereignty-protection-office-okotars-dangerous/>

2.2.2. Attacks During Demonstrations and Advanced Online Harassment: Worrying Trends in Western Europe

When thinking about threats to press freedom in Europe, our attention often turns eastward, towards states with more overt control of the media. However, the MPM2025 data paint a more complex picture.

Fig. 2.d. Physical safety of journalists - map of risks per country

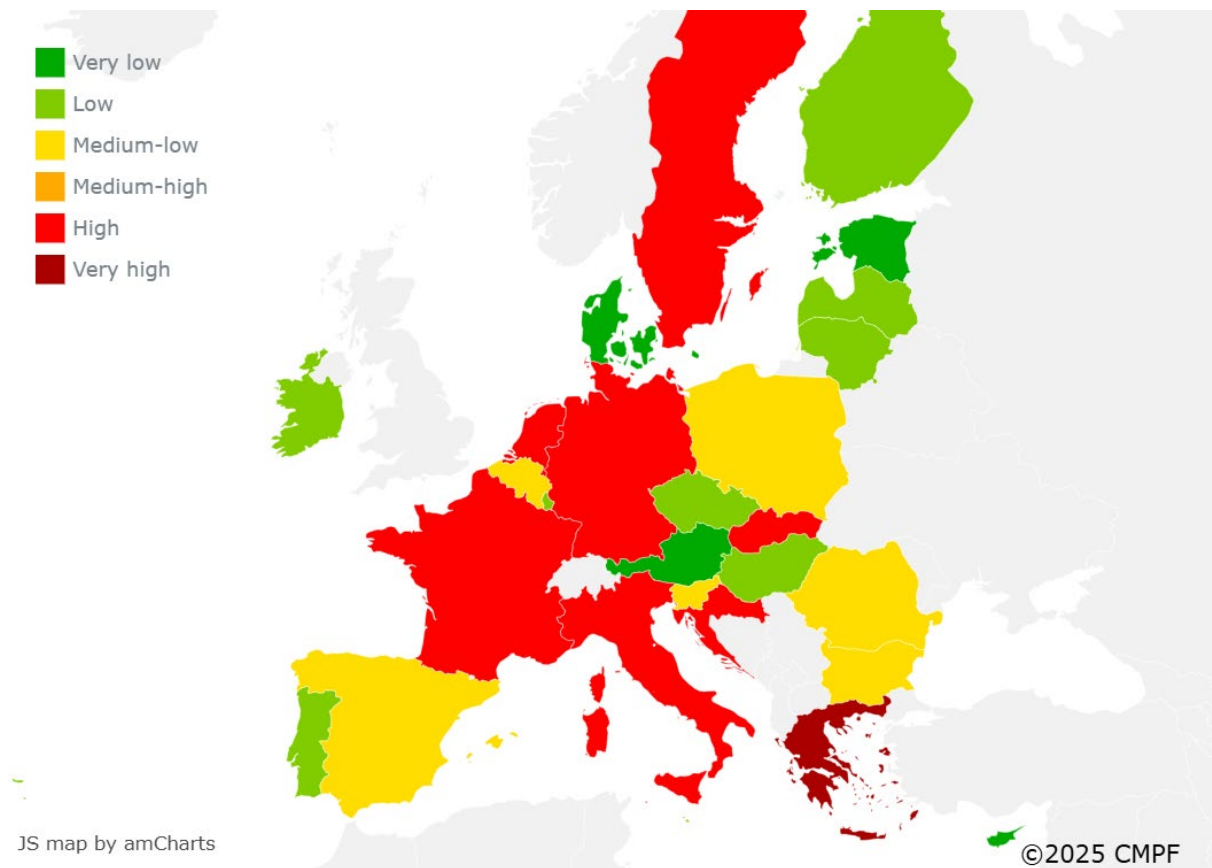
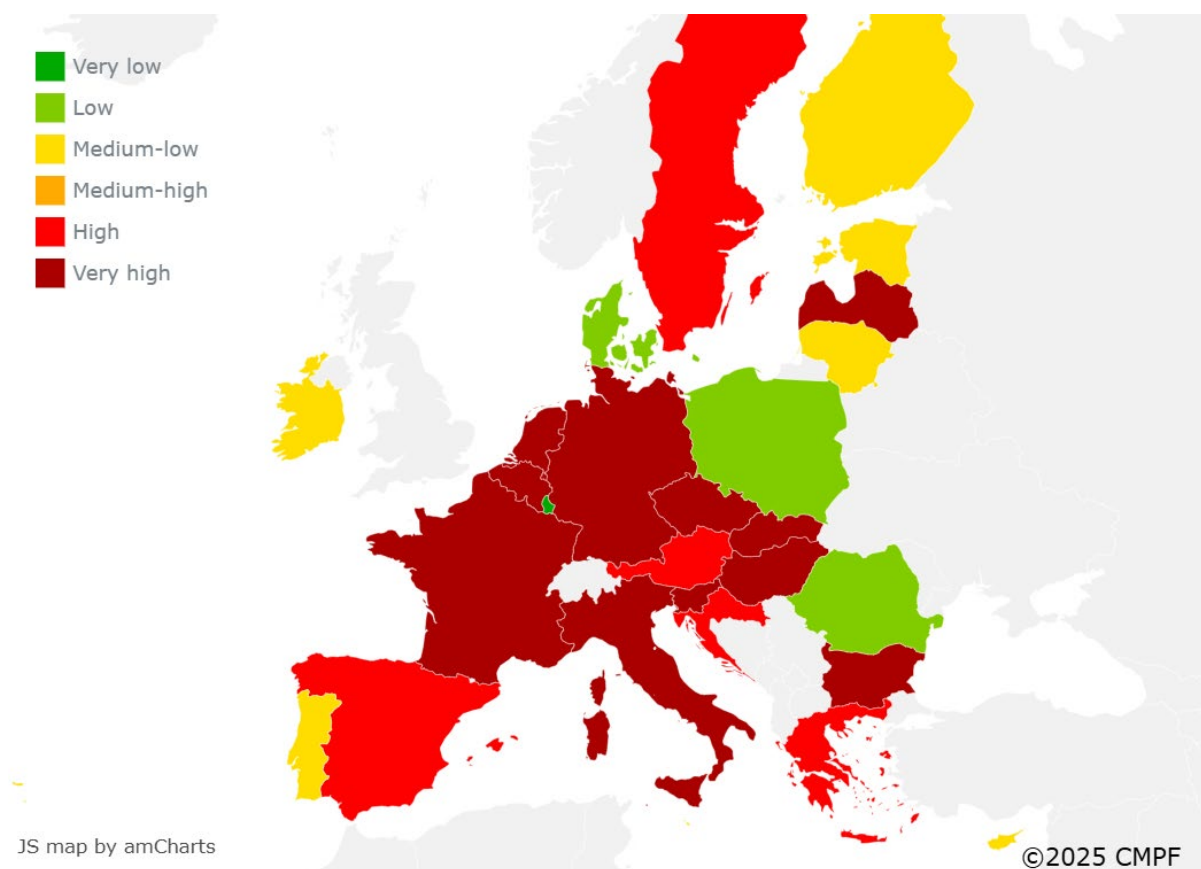


Fig. 2.e. Digital safety of journalists - map of risks per country



As shown in the maps above, Western European democracies are showing troubling signs of erosion in press freedom (CMPF, 2025). Seven countries scored high risk regarding the physical safety of journalists: among them, France, Germany, Italy, Sweden, and the Netherlands. Greece scored a very-high risk. Six countries scored a medium-low risk, among them Belgium and Spain. The concerns are even higher when looking at the digital safety of journalists: five countries score high risk (among them, Austria, Spain, Sweden), and eleven countries score very-high risk (among them, France, Germany, Italy, and the Netherlands).

Journalists across Western Europe are increasingly subject to physical violence, harassment, online attacks and surveillance, and institutional pressure. Demonstrations have become flashpoints for physical attacks. Reporting on highly sensitive topics like corruption, migration, environmental issues, elections (2024 was a super-election year, when tensions were heightened by far-right mobilisation) and war (especially Ukraine and Palestine) increasingly puts journalists at risk of severe harassment: when the latter takes place online, it ranges from hate speech, doxing and spoofing²³ to intrusive surveillance.

23 'Spoofing attacks involving impersonation, identity disguise, or the falsification of data with the intent to deceive and manipulate have been a worrying threat to media freedom in 2024. Frequent recorded incidents of spoofing involved deep fakes posing as journalists and media workers, as well as fake websites imitating the design and structure of legitimate news portals to spread false information' (MFRR, 2024, p. 7).

The use of deepfakes has emerged as a new tool to threaten and discredit journalists. With regard to surveillance, the protection of journalistic sources is generally recognised in the EU, but the MPM2025 study brought to light an emerging series of examples of illegitimate surveillance through intrusive technologies placed in journalists' devices. This practice has been prohibited by Art. 4 EMFA, which requires Member States to ban the use of surveillance and spyware against journalists except in narrowly defined circumstances, such as investigations of serious crimes. Surveillance must be authorised by a judicial or independent decision-making authority and be subject to regular review (Kermer, 2024). It remains to be seen how the EU MS's will implement such a provision, in light of the growing number of surveillance cases (e.g. in 2024, in Italy). These trends are confirmed by other EU-wide studies, such as the 2025 report of the Council of Europe's Platform to Promote the Protection of Journalism and Safety of Journalists and the 2024 Media Freedom Rapid Response report²⁴.

The following list explores a series of examples of physical and online attacks against journalists in Western European countries.

Belgium

The Belgian MPM team (Wauters & Kuczerawy, 2025) reports that in October 2024, the Flemish Journalists' Association (VVJ) published its annual report based on cases submitted through its platform for reporting incidents, Persveilig.be. The findings revealed a concerning number of attacks against journalists throughout the year. Mapping Media Freedom also reported a notable increase in incidents, with 22 cases reported in 2024 compared to the 8 reported in 2023. Reporters covering protests were not only attacked with objects but also had their equipment forcibly seized, and in at least one case, a journalist for ZIN TV was violently arrested by police during the protest, which led her to file a complaint for illegal detention and mistreatment. The situation further deteriorated following far-right victories in the local elections. In Ninove, French-speaking journalists were insulted and physically assaulted while covering post-election events. After the local elections of October 2024, Vlaams Belang — the Flemish far-right political party — launched a smear campaign with sponsored Facebook posts, stating “Never believe DPG Media”, after the organisation had called VB an extremist party and refused to publish their advertisement. Newspapers *Het Nieuwsblad*, *De Standaard* and *Belga* (news agency) were targeted with a bot campaign by a pro-Russian hacker group. News presenter Hanne Decoutere (VRT) was the target of a deep fake video in which she allegedly asked people to download a casino game application²⁵.

24 Mapping Media Freedom recorded 31 cases of deepfakes' use against journalists, compared to 6 in the previous year (MFRR, 2024, p. 10). It recorded 17 cases of hacking and DDoS attacks, including 14 directed at media companies, as well as 3 incidents targeting a journalists' union and press organisation, 11 cases of surveillance and interception, and 5 cases of raids (p.11).

25 In spoofing attacks throughout Europe, one recurring tactic is to depict journalists promoting fraudulent advertising, in order to discredit them.

France

The French MPM team (Ouakrat & Bienvenu, 2025) reports that in July 2024, the journalists' union SNJ denounced the rise of attacks against journalists during the first six months of the year (which quadrupled during the month of June 2024). The Mapping Media Freedom platform monitored 94 alerts of media freedom violations in France during the year.

During the summer of 2024, three journalists (Mohamed Bouhafsi, Karim Rissouli and Nassira El Moaddem) revealed how they have been targeted by racist insults and threats on both social media and also at their personal homes. The far-right website *Réseau Libre* published a list of 180 personalities, including journalists, whom it stated deserved “a bullet in the neck”. Repeated acts of vandalism against the studio of *Radio Bip*, a local radio based in Besançon, demonstrate how far-right intimidation operations do not only target mainstream media figures but are, in fact, generalised all over the territory. Environmental journalists also face growing intimidation, exemplified by the recurring threats against journalists specialised in the agro-industrial complex *Morgan Large*. Some journalists were held in police custody in 2024 in France, such as *Disclose* journalist Ariane Lavrilleux, who was spied on, arrested and held for 39 hours, as well as having her home, social media profiles and phone searched. She was put under investigation for breaching state secrecy after reporting on France's sales of weapons abroad and the involvement of the French military in an operation that killed civilians in Egypt. Another journalist, working for *Blast* and investigating France's weapon sales to Israel, was put into custody for 32 hours and suffered intimidation by policemen to reveal her sources. Intimidation against journalists also happened during the Olympics, as exemplified by the 10-hour detention of two journalists attempting to follow the action of *Saccage 2024* activists.

Germany

Kalbhenn (2025) reports that most of the physical attacks against journalists in Germany in 2024 occurred during public demonstrations. Freelance journalist Kili Weber was attacked twice: once [in January](#) by *Querdenken* activists and again [in April](#) during a far-right rally in Freiberg. *Welt* TV reporter Steffen Schwarzkopf was assaulted live on air while covering the Thuringia elections. In Berlin, Iman Sefati from *Bild* was beaten and threatened while reporting on a pro-Palestinian protest. A troubling new trend emerged with blockades of newspaper distribution centres and printing plants, all aiming to disrupt press operations. RSF documented five such cases, which targeted outlets like *Allgäuer Zeitung* and the Springer plant, often in response to dissatisfaction with media coverage. Finally, three AI-generated audio files were played during an anti-government protest, containing false apologies from the broadcaster Tagesschau for “deliberate manipulation” over its reporting, including on Ukraine.

Italy

As reported by Vigevani et al. (2025), Italy became the centre of a significant surveillance controversy in early 2025 when it was revealed that the Israeli spyware “Graphite,” developed by Paragon Solutions, had been used to target journalists and human rights activists. Among the confirmed targets were Francesco Cancellato, editor-in-chief of *Fanpage.it*, and Luca Casarini, founder of the NGO *Mediterranea Saving Humans*. Both are known for their critical reporting on government policies, particularly concerning migration and humanitarian issues. The Italian government acknowledged its contractual relationship with Paragon Solutions but denied any involvement in the unauthorised surveillance activities. Following these revelations, Paragon Solutions terminated its contract with Italy, and various civil society organisations called for transparency regarding the Italian government’s relationship with the company. The incident led the National Press Federation and the National Council of Journalists to file a criminal complaint against unknown persons with the Rome Prosecutor’s Office. Italy thus joins the growing list of European countries that have been accused of carrying out unlawful surveillance of journalists with spyware.

Attacks on journalists’ vehicles have also been reported, raising concerns of intimidation. Among them, on 24 November 2024, the car of journalist Gaetano Fioretti — known for reporting on illicit waste trafficking and illegal construction — was vandalised outside his home in Casalnuovo di Napoli, in what he described as an act of intimidation. Other relevant physical attacks include the assault on journalist Alberto Dandolo on 25 May 2024 in his home in Milan by unidentified perpetrators, which left him injured and threatened and prompted a police report and widespread condemnation. In addition, an attack on Andrea Joly, a reporter for *La Stampa*, on 20 July 2024 in Turin by CasaPound neo-fascists, resulted in injuries that required hospital treatment.

Spain

Suau-Martinez et al. (2025) reported various incidents. Among them, police forces physically assaulted journalist Fermín Grodira while he was covering a protest against the Generalitat’s management during the DANA storm. Protesters also attacked an RTVE news team during a farmers’ demonstration. Beyond physical aggression, political figures and their teams engaged in smear campaigns and issued online threats; notably, Miguel Ángel Rodríguez publicly threatened journalists from [elDiario.es](https://www.eldiario.es). Harassment also came from private actors: business owners like Daniel Esteve insulted and threatened *La Sexta* journalists on social media. Meanwhile, groups and supporters of the far-right launched coordinated online threats against journalists such as Silvia Intxaurreondo, after she expressed critical opinions in public broadcasts. Attacks by anonymous actors were also documented, including a cyberattack targeting the websites of *Mèdia.cat*, a media observatory.

The Netherlands

De Swert et al. (2025) report that in 2024, 249 harassment cases were reported by journalists in the Netherlands, including physical assaults, discrimination and intimidation, a notable increase compared to previous years. According to Persveilig (2024), one of the causes for the increase was the higher number of cases in the context of pro-Palestine protest actions, a lot of them in the spring during the pro-Palestine protest at the University of Amsterdam. Another notable case in 2024 was the arrest of a photographer during a pro-Palestine protest in Amsterdam, despite the fact that they were holding a valid press card. Persveilig (2024) noted that after the Amsterdam incidents, constructive talks have taken place between journalists and the police. Journalists are facing more and more threats online, including the practice of doxing, highlighting the need for the vigilant enforcement of new legal protections. Generally, impunity remains a problem. While convictions in high-profile cases (e.g. regarding the murder of journalist Peter R. de Vries in 2021) show progress, concerns about impunity and limited law enforcement capacity—especially for online harassment—persist and require further monitoring.

An anti-doxing law was enacted in the Netherlands (Dutch Criminal Code, art. 285bd and arti. 298b, effective January 2024), strengthening protections for journalists and whistleblowers by criminalizing the publication of personal data intended to intimidate. Similarly, the Dutch Data Protection Authority (DPA) took stronger action against violations of privacy laws, imposing a €30.5 million fine on Clearview AI for illegally collecting facial images²⁶. Also, new rules introduced by the Public Prosecution Service in April 2024 require judicial approval for journalist surveillance, which is a key safeguard for press freedom. However, amendments to the Intelligence and Security Services Act (Wiv), approved in early 2024, expanded bulk surveillance powers, triggering public criticism.

2.2.3 Focus on SLAPP: The EU Directive and the State of Play

Most of the vexatious lawsuits against the media are brought against individual journalists, followed by media organizations and activists, and are triggered by investigations into corruption and environmental issues (CASE, 2024, p. 18 and 22). The CASE coalition considers that ‘SLAPPs are increasingly being employed as a form of private censorship’ (p. 26), i.e., not coming from the state but from private lawsuits, taking into account however that oftentimes the plaintiff is a public official or politician. In 2024, the EU enacted the anti-SLAPP Directive (2024/1069), following years of advocacy and pressures from media lawyers, activists, civil society organizations, and journalistic organisations, among others (Borg-Barthet & Farrington, 2025).

According to MPM2025, Croatia and Hungary are the most problematic countries in the

²⁶ Autoriteit Persoonsgegevens. (2024). The Dutch DPA imposed a fine on Clearview because of illegal data collection for facial recognition. <https://www.autoriteitpersoonsgegevens.nl/en/current/dutch-dpa-imposes-a-fine-on-clearview-because-of-illegal-data-collection-for-facial-recognition>

EU concerning the number and nature of SLAPPs against the media. In Croatia, a recent study (quoted in Bilić, 2025) analysed 1,333 court rulings from 2016 to 2023, finding that 40% exhibited SLAPP characteristics. Croatia has 752 active lawsuits against journalists, mostly criminal defamation cases.

In 2024, a number of prominent political figures initiated SLAPPs against journalists and media organisations. For example, Hungarian Prime Minister Viktor Orbán filed civil lawsuits against several Hungarian media outlets for reporting a story claiming that the prime minister put pressure on the Spar supermarket chain (Bleyer-Simon et al., 2025). In Italy, the number of lawsuits filed by political figures to target government critics increased in 2024 (Vigevani et al., 2025; MFRR 2024). In Slovakia, Prime Minister Robert Fico filed a SLAPP lawsuit against Peter Bárdy, editor-in-chief of Aktuality.sk, and the organisation's publisher, objecting to the use of his photograph on the cover of Bárdy's book "*Fico. Obsessed with Power*". The prime minister is seeking an apology and €100,000 in damages from each party (Urbániková, 2025).

In 20 EU countries, defamation is a crime and can be punishable by imprisonment. In various instances, despite the implementation of reforms to decriminalise defamation, penalties for aggravated defamation (e.g. against public figures or the state) remain in place. This was the case with Law 5090/2024 in Greece, for example (Papadopoulou & Angelou, 2025). Also, reforms which, on paper, might ameliorate procedural issues related to charges against journalists (e.g. in terms of the length of trials), such as the Slovakian government's proposal of establishing specialised courts which would exclusively handle cases against journalists and media, are criticised for possibly representing a crackdown on independent media (Urbániková, 2025).

Key changes in this regard are taking place in Poland, where in April 2024 the new Minister of Justice, Adam Bodnar, announced his plans to abolish the criminal provisions of Article 212 of the Criminal Code while strengthening civil liability. This change also considers the issues of burden of proof and the disclosure of data of anonymous haters in the online sphere. A draft has been under evaluation since the end of 2024 (Klimkiewicz, 2025).

Beside the use of defamation laws for abusive lawsuits, a new trend in Hungary concerns the use of GDPR as a basis for SLAPPs (Rucz, 2022). In 2024, there were two cases in which courts made favourable decisions for media that were "SLAPPED" by Hungarian businessmen on GDPR-related bases. Art. 85 of the GDPR requires that special privilege is recognised concerning data processing in the context of journalistic activities. On 12 June 2024, the National Council of Austria adopted a federal law to amend the Data Protection Act so that it would provide a graduated scale of privilege. It distinguishes between journalistic activity within the framework of media companies and media services (§ 9 Abs 1 DSG) and other journalistic activity (§n 9 Abs 1a DSG). This differen-

tiation may not, however, be objectively justifiable and could end up penalising freelancers (Seethaler et al., 2025).

Greece is also among the countries to score a high-risk level in MPM2025 concerning the existence of SLAPP cases. On the positive side, the Court of First Instance of Athens dismissed one of the many SLAPP lawsuits that the former director of the prime minister's office, Grigoris Dimitriadis, filed against media outlets and a journalist who revealed the Predator spyware scandal in Greece (Papadopoulou & Angelou, 2025). A positive outcome was also reached in the lawsuit raised in Latvia by the Society Integration Fund (SIF) against the investigative journalism centre, RE:Baltica. The latter was asked to repay EUR 35,700 from the state's direct support for quality journalism projects because in their investigative film sources who spoke Russian were subtitled instead of voiced-over. RE:Baltica appealed this decision and on December 4, 2024, the SIF Council overturned the fine (Rožukalne & Skulte, 2025).

The 2024 EU anti-SLAPP Directive focuses on cross-border civil lawsuits, which however only account for 9,4% of the SLAPP cases across Europe (CASE, 2024). Criticism of the Directive has been raised regarding its limited procedural safeguards (e.g. early dismissals are available only in manifestly unfounded proceedings). It is therefore desirable that Member States will transpose the Directive with a wider scope of application, especially when related to domestic SLAPP cases, and will also take into account the Council of Europe's approach in Recommendation CM/Rec(2024)2 'on countering the use of strategic lawsuits against public participation (SLAPPs)'.

The anti-SLAPP directive has, so far, only been transposed in Malta.

- In Malta, the EU's anti-SLAPP directive was officially transposed, by means of Legal Notice 177 of 2024, which introduces the Strategic Lawsuits Against Public Participation (SLAPP) Order, 2024. It introduces key measures such as security for costs by the plaintiffs, early dismissal of unfounded claims, penalties for abusive litigation up to €10,000, and legal aids for defence. The transposition has been considered 'a missed opportunity', considering that it only focuses on cross-border lawsuits, and establishes a low cap for penalties (Palmer & Bleyer-Simon, 2025).

According to the MPM2025 reports, discussions on the transposition are ongoing in the following countries:

- In Croatia, where the number of SLAPPs is among the highest in Europe, the Ministry of Culture and Media and the Ministry of Justice and Digital Transformation formed a working group and hosted roundtable discussions. Education-

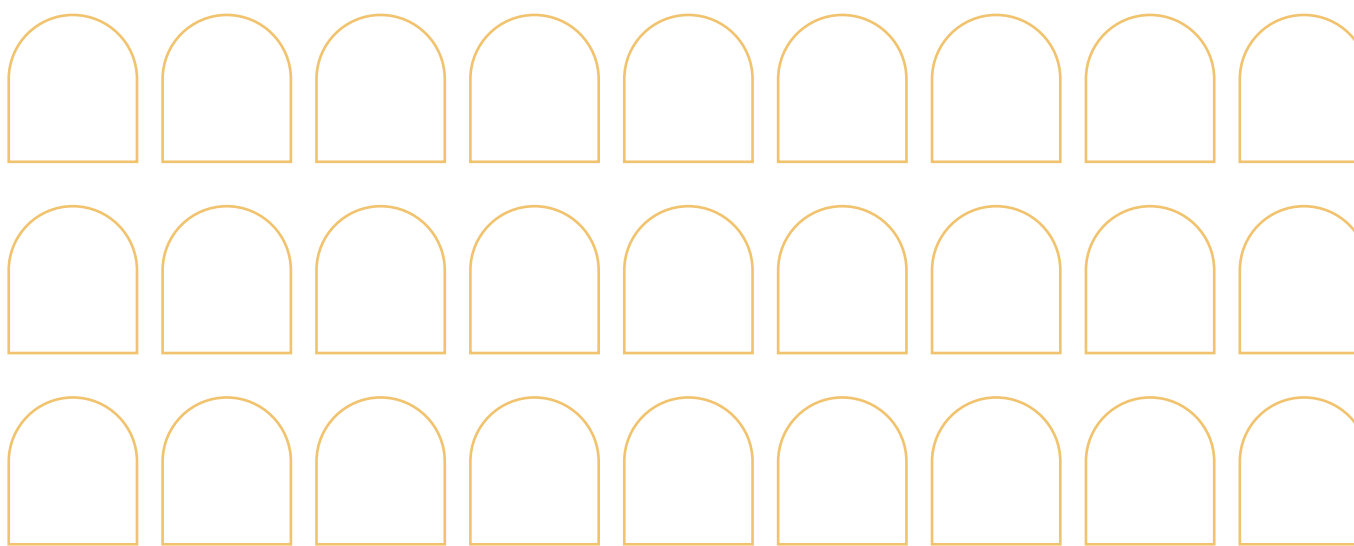
al workshops for judges and media professionals have been held across Croatia, with anti-SLAPP legislation discussions expected to continue in 2025 (Bilić, 2025).

- In Bulgaria, a working group led by the Deputy Minister of Justice has been established to align the Bulgarian Code of Civil Procedure with the Directive. The special anti-SLAPP fund launched in 2023 by the Association of European Journalists (AEJ Bulgaria) continues to support journalists and other citizens to defend themselves in SLAPP cases (Spasov et al., 2025).
- In Greece, a special committee has been established to examine SLAPP cases and propose legal reforms, but yet, no official legislative initiative has been introduced in parliament (Papadopoulou & Angelou, 2025).
- In Ireland, the Defamation (Amendment) Bill 2024 was expected to address some forms of SLAPPs against journalists and others, and Part 7 of the bill was supposed to transpose the EU's anti-SLAPP directive. However, this lapsed in November 2024 when elections took place following the dissolution of the parliament in the same month. The new coalition government has committed to prioritising the reintroduction and passing of the legislation (Flynn, 2025).
- The Latvian Ministry of Justice has committed to developing a SLAPP monitoring system. There are initiatives aimed at creating a separate SLAPP chapter in Latvian civil law. It is expected that the transposition will also include domestic SLAPP cases, considering that there are virtually no cross-border SLAPP cases in Latvia (Rožukalne & Skulte, 2025).
- In Lithuania, an amendment to the Code of Civil Procedure (Art. 95.1) was adopted, which defined the procedure for applying anti-SLAPP measures²⁷ (Jas-tramskis, 2025).
- In the Netherlands, an anti-SLAPP bill was drafted in 2024. However, among other things, it was criticised for being limited to cross-border cases only. Existing Dutch laws already provide certain safeguards against unfounded or abusive legal actions that may hinder public participation. Dutch civil law prohibits the

27 If the defendant (public participation representative) believes that the plaintiff has dishonestly filed an unfounded claim to harm the defendant's public information activity or other activities related to the protection of the public interest or to deter the defendant from such activities, they have the right to file a complaint with the court. The court, having received the defendant's complaint and having been preliminarily convinced of its validity, shall oblige the plaintiff to file responses to the defendant's application, substantiating their claim and providing evidence. If the plaintiff fails to file responses to the defendant's application within the specified time limit or fails to submit evidence confirming the circumstances indicated by the plaintiff certain measures will be taken. For example, if such evidence was not submitted with the claim, or the court establishes that the plaintiff has dishonestly filed an unfounded claim with the aim of harming the defendant's public information or other activities related to the protection of the public interest or to deter the defendant from such activities, the claim shall be left unexamined.

misuse of legal rights, allowing courts to dismiss cases deemed to be filed with the intent to intimidate or silence critics (De Swert et al., 2025).

- In Poland, SLAPPs could be counteracted with the help of existing provisions in Polish law; however, they cannot be fully effective so long as a legal definition of SLAPP is missing (Klimkiewicz, 2025). In November 2024, the organisation Article 19 proposed a set of recommendations with some other NGOs to form an anti-SLAPP coalition (Article 19, 2024).
- In October 2024, the Slovenian government took note of the starting points for drafting the anti-SLAPP Directive's transposition law. These points provide for a wider scope of application, apply to exclusively national cases, and consider the appropriateness of anti-SLAPP measures in criminal proceedings. The Ministry of Justice submitted a proposal for public consultation in December 2024 (Milosavljević & Biljak Gerjevič, 2025).

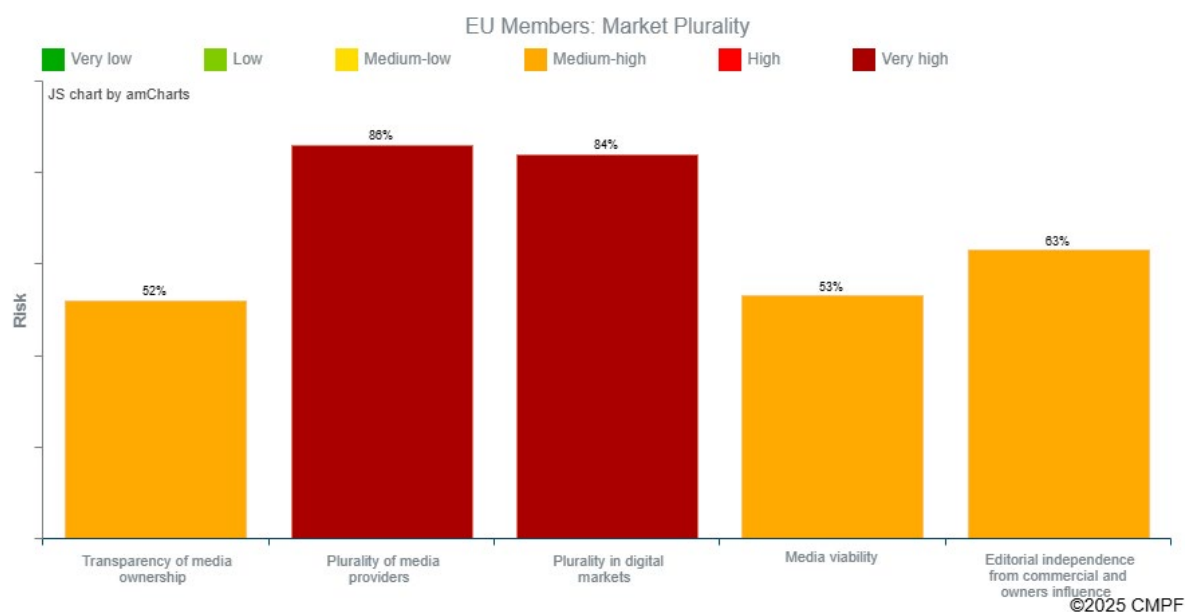


CHAPTER 3. Market Plurality

The Market Plurality area considers the economic factors that impact the plurality of the media offer and assesses the risks deriving from insufficient transparency in and the high concentration of media ownership, economic sustainability of the media, and the undue influence of commercial interests and ownership over editorial choices. Moreover, the area assesses the risks deriving from the high concentration of digital markets and the dependency of the media on online intermediaries.

3.1 Results in-depth

Figure 3.a. Market Plurality area. Averages per indicator



The results of the **Market Plurality** area confirm that the risks originating from the economic sphere are high and widespread across EU countries. This is the only area across the MPM at high risk level for the average of EU countries, and it includes two in-

dicators at very high risk level: *Plurality of media providers* and *Plurality in digital markets*. While no country is at a low risk level, the majority of Member States are between the medium-high and high risk bands. On the one hand, media ownership is often not fully transparent and is highly concentrated; on the other hand, the digital markets in which the media operate also present a high level of opacity and concentration. *Media viability* and *Editorial independence from commercial and owners influence* are at the medium-high risk level.

TRANSPARENCY OF MEDIA OWNERSHIP

MEDIUM - HIGH RISK

This indicator assesses the risks to transparency of media ownership within the news media sector. It evaluates the existence and effectiveness of media-specific laws requiring the disclosure of ownership details, including financial information. In the absence of such laws, it also considers whether the disclosure of media ownership information is guaranteed in practice.

In this edition of the MPM, the indicator on *Transparency of media ownership* scores a medium-high risk and represents the lowest risk level within the Market Plurality area. Most countries fall within the medium-high risk band; two countries score at the very low risk level (Germany and Slovakia); three countries at the low risk level (Bulgaria, Portugal, Lithuania); six countries score at the high risk level (Belgium, the Czech Republic, Finland, the Netherlands, Romania and Slovenia), while three countries are categorised in the very high risk band (Cyprus, Hungary, and Spain). Germany's low risk result is justified in part by the fact that the German Commission on Concentration in the Media (KEK) operates an online media database that offers detailed information about corporate investments across various media sectors, including TV, radio, press, and online platforms, which provides quick and easy access to ownership details and links related companies and media entities (Kalbhenn, 2025). Similarly, in Slovakia, since 2022, with the adoption of Act No. 264/2022 Coll. on Media Services and Act No. 265/2022 Coll. on publications, publishers, online news operators, broadcasters, and providers of on-demand audiovisual media services are required to disclose ownership structures, including ultimate owners (Urbániková, 2025). In contrast, a widespread concern for the Member States that perform poorly in this indicator is the lack of media-specific, comprehensive legislation mandating the disclosure of media ownership information across all media sectors. In many cases, only the audiovisual sector is subject to specific legal requirements, leaving radio, print, and especially digital media in relative obscurity (Toma et al., 2025). Kuczerawy & Wauters (2025), who analysed the situation in Belgium, stated that this is related to the tradition of leaving non-audiovisual news media relatively free and unsupervised. In addition, the degree of detail of the information provided is not sufficient to identify the ultimate or beneficial owner, an issue that is particularly problematic in the digital news sector (Bilić, 2025).

EMFA Insight - Transparency of Media Ownership (Art. 6.1 and 6.2)

With the applicability of Article 6 EMFA from August this year, which mandates, among other things, the disclosure of ownership structures and the creation of national ownership databases—some Member States have begun to take action by drafting relevant legislation. For instance, Spain announced an ‘Action Plan for Democracy’ in September 2024, which includes the creation of a mandatory media registry to be managed by the National Commission on Markets and Competition (CNMC) (Suau Martinez et al., 2025, p. 19). Similarly, in Poland, the Ministry of Culture has revealed plans to enhance transparency by developing a national media ownership database as part of a new media law (Klimkiewicz, 2025, p. 20). In Finland, the government has proposed a new media law that includes the establishment of a publicly accessible national database on media ownership to be managed by the Finnish Transport and Communications Agency – Traficom (Ylikoski & Ala-Fossi, 2025, p. 23). In a similar vein, the Swedish EMFA memorandum proposes new media-specific rules, including measures to address media ownership concentration and transparency requirements that mandates media providers to disclose ownership structures, financial information, and sources for public funding (Färdigh, 2025, p. 15).

PLURALITY OF MEDIA PROVIDERS

VERY HIGH RISK

The Plurality of media providers indicator assesses the threats to media pluralism that arise from the concentration of media ownership. It evaluates the legal framework for horizontal and cross-media concentration, and the situation on the ground, using the Top4 index for each sector (AVMS, radio, newspapers, digital) and for the whole media market.

The indicator on Plurality of media providers scores a very high risk level, once again confirming market concentration as one of the main sources of concern for media pluralism. Twenty countries score at very high risk, and seven countries are at high risk. As in the past year, the risks are quite homogeneous across EU countries, showing that the economic dynamics that push toward media consolidation are common. The (relatively) better situation of the countries at the lowest border of the high risk does not derive from the situation on the ground, but from the legal framework: this is the case of Germany

and Italy, where the regulatory framework provides rules aimed at tackling excessive media market power - even though the economic measurement of the media ownership concentration calls the effectiveness of these rules into question. At the highest border of the risk, there are the countries that present similarly high levels of concentration (often due to the small dimensions of the markets) and in addition do not have media-specific anti concentration rules.

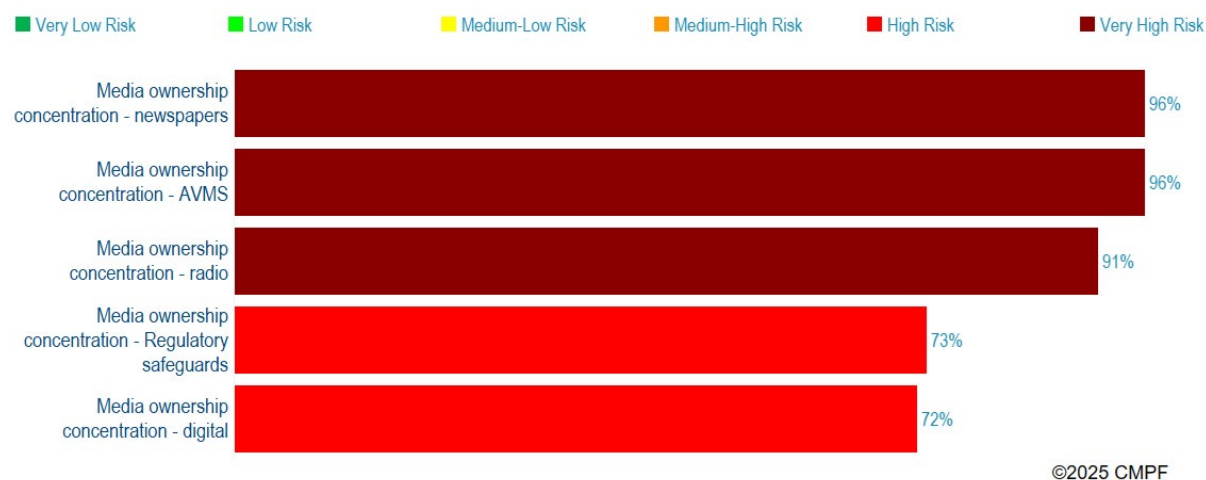
Two factors contributed to increase the level of risk for this indicator in the MPM 2025. The first one is related to the legal framework, as this year MPM also asks a specific question on media mergers: in the majority of EU countries, the evaluation of mergers that involve media players is conducted under the economic criteria of competition law, without specific evaluation of the impact on media pluralism and opinion power (see focus n. 1 in this section). The second one is related to the media consumption: the results show that concentration is at the highest level in the traditional sectors, that still are the most used media to access news (like AVMS), and that the impact of digital media did not counterbalance this trend, in particular in countries in which the sector is dominated by the digital extension of the traditional media. (see Methodology).

The MPM narrative reports show that the tendency toward concentration continued in the year of assessment. In the Netherlands, a potential merger between two major players, DPG Media and RTL Netherlands, has come under the scrutiny of the competition authority (De Swert et al., 2025); similarly, in Lithuania the competition authority called off a merger in the digital media sector (Jastramskis 2025). Several mergers in the newspapers, tv and digital sector are reported in Finland, though the number of titles did not decrease after the operation (Ylikoski & Ala-Fossi 2025). In France, growing concerns on cross-media concentration and the dominance of a handful of owners also sparked a debate about the effectiveness of the legal safeguards and of the administrative sanctions by ARCOM (Ouakrat & Bienvenu 2025). Shortcomings of the regulatory framework are reported in many other countries. These shortcomings include a lack of media-specific rules, the limited extension of the framework which fails to cover all the media sectors and is inadequate in the digital environment (Kalbhenn 2025), and the poor effectiveness of sanctions (Urbániková, 2025; Štetka et al. 2025).

EMFA Insight - Level of Media Concentration (Art. 26 - Monitoring Exercise)

The main novelty introduced by EMFA regarding media concentration is a common legal framework for assessing mergers involving media (art. 22, see focus n. 1 in this section). It is worth noting that art. 22 EMFA does not intervene to tackle, or reduce, the existing concentration or market dominance arising from the growth of a player. The existing level of media concentration enters into play in two ways: first, to evaluate the impact of the proposed merger, and second, in the monitoring exercise prescribed by art. 26 (3)(a). In this regard, the results of the MPM, which measure the audience and revenue shares of the first four groups per media sector and cross-media, show that horizontal concentration of ownership is particularly high in the traditional media sectors, whereas in the digital media sector (that is, the online media providers not including the digital intermediaries and aggregators) it is slightly lower. Cross-media ownership concentration is at a high or very high risk in all EU countries, except in Germany, where it is at medium-low risk. Opacity and lack of data contribute to the risks facing the good functioning of competitive media markets.

Figure 3.b. Risk levels for horizontal and cross-media concentration in the EU



Note: Figure 3.b visualises the results of MPM2025 for the sub-indicators on media ownership concentration, based on the Top4 index per sector and cross-media. A lack of market and audience data is evaluated as a risk, according to the MPM methodology.

PLURALITY IN DIGITAL MARKETS

VERY HIGH RISK

The indicator on Plurality in digital markets evaluates risks emerging from the market power of digital intermediaries to the news (very large online platforms, search engines, and - more recently - AI-based aggregators). It includes measures of concentration, copyright protection and the monetisation of media content in the digital environment.

This is the only indicator across the MPM exercise to show an average very high level of risk across EU countries. The results show a largely uniform situation, with almost all the countries grouped between 75% and the maximum risk level, and only Germany out of the red area, with a medium-high risk level of 62%. This result is the obvious consequence of the fact that digital markets are supra-national, and the same few digital gatekeepers dominate the online advertising market and the attention markets (Prat & Valletti, 2022; Prat, 2020). Digital markets are also characterised by opacity and lack of data, in particular, when it comes to audience measurement. For the sake of this indicator, the economic measurement of concentration of the market (see Figure 3.c) is complemented by an assessment of the legal framework and the socio-political factors that contribute to reducing the imbalance of market power between the online platforms (and more generally the tech companies) and the media providers, with a sub-indicator named ‘fair allocation of economic resources’, whose results show a greater variance.

Figure 3.c. Concentration of online platforms - map of risks per country

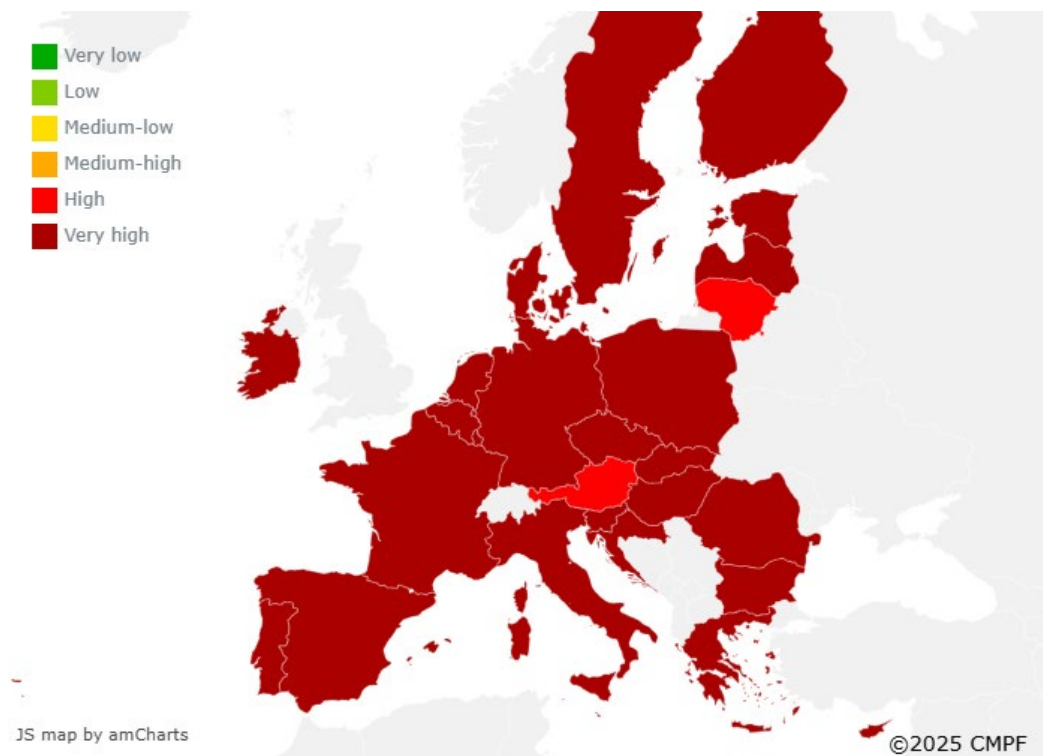


Figure 3.d. Fair allocation of economic resources - map of risks per country

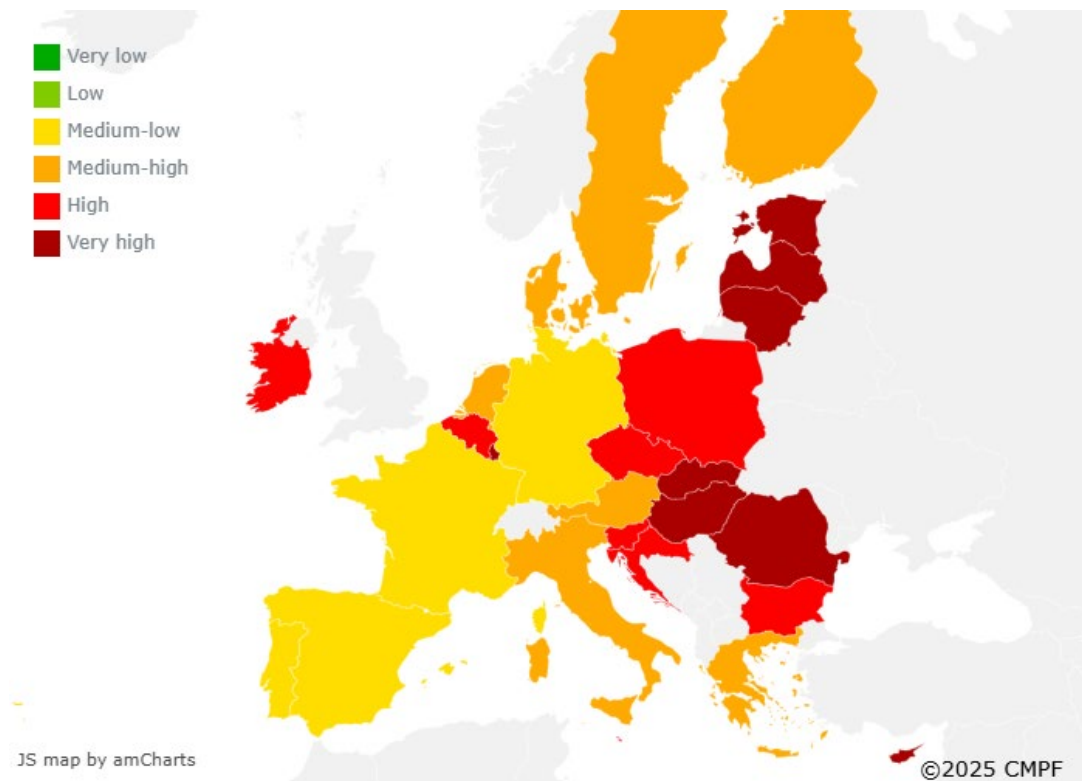


Figure 3.d shows the evolution on the ground related to regulatory efforts and competition enforcement, and also to the issue of copyright and fair remuneration of media content used and monetised by digital intermediaries and AI companies (see Focus n. 3, below). The taxation of digital players is also considered in this assessment, as another way to level the playing field and as a potential source of revenue that might contribute to financing public-interest media, with a redistribution not deriving from contractual obligations but from public policies (Brogi & Carlini, 2021). In fact, a reduction of the risk was registered in the countries that effectively implemented the Council Directive (EU) 2022/2523 of 14 December 2022 (global minimum tax); nonetheless, we see problems of effectiveness arising even in countries that in the past tried to use digital taxation revenues to support the media (Seethaler et al., 2025). In 2024, France increased its digital services tax (TSN, the so-called GAFAM tax) to 5%, but its future is uncertain amid political instability (Ouakrat & Bienvenu 2025).

MEDIA VIABILITY

MEDIUM - HIGH RISK

The indicator on Media viability assesses the sustainability of the news media production, as a prerequisite for media diversity and media pluralism. The indicator measures the risks related to the lack of sufficient economic resources to finance journalism, and assesses the market trends of legacy, digital and convergent media and the potential role of public support. The market trends are evaluated in relation to GDP trends.

Eighteen countries can be found in the medium-low or the medium-high risk range for the *Media viability* indicator, which looks at how the media market is performing. Only the three Baltic countries show a low risk, while Cyprus, Hungary, Ireland, Malta, Romania, and Slovenia are high risk countries. The revenue trends sub-indicator exemplifies that news media still experience difficulties generating sufficient revenues – as willingness to pay for news remains low (Robertson, 2024) and online intermediaries gain most of the advertising revenues. While the steep decline of earlier years is over, there are very few examples where the media industry managed to grow. Print and local media are especially weak. The audiovisual and radio sectors still see increasing revenues in 10 and 14 countries (respectively), while most of the states covered still do not provide statistics on the online news media market. Cuts in public service media support are being planned in Estonia, Finland and the Netherlands, among other countries.

Many expert teams reported innovations in newsrooms and a diversification of revenues, but there are concerns about their sustainability. In Hungary, laws that target the recipients of foreign grants might cut access to this crucial revenue source (Bleyer-Simon et al., 2025), while the recent cancellation of US State Department funding might hurt smaller newsrooms (especially investigative outlets and fact-checkers) across the EU.

The employment trends of countries show that journalism is still not an appealing profession – even if the number of journalists stabilised in most countries, it did so at a low level. When it comes to public support for private media, seven countries completely lack subsidies, while many others are insufficient or do not cover online media. Only eight countries (Belgium, Denmark, Latvia, Lithuania, Luxembourg, the Netherlands, Portugal and Sweden) have support schemes that are considered comprehensive and effective.

EDITORIAL INDEPENDENCE FROM
COMMERCIAL AND OWNERS INFLUENCE

MEDIUM - HIGH RISK

The indicator on Editorial independence from commercial and owners influence assesses risks to market plurality posed by business interests on the production of editorial content,

both from commercial and owners' influence. To assess this risk, it considers the existence of rules and regulatory safeguards about professional journalism as well as effective independence and autonomy of editorial decision/making.

Almost half of the countries (13) score either high or very high risk on this indicator. This shows that, in a weak media market, news media are extremely vulnerable to market pressures. Measures that aim to safeguard the integrity of content are still missing in many countries – examples are so-called conscience clauses that protect journalists and editors from being pressured by owners, for example by enabling them to retain their benefits in case they leave their job due to changes in the editorial line.

In 20 countries, the integrity of newsrooms is compromised, as there is a lack of effective firewalls between commercial and editorial activities of newsrooms and unlabelled or native advertising blurs the line between information and promotion. In Italy, researchers have highlighted that apparently news stories are 'published about events or products of companies that have simultaneously purchased advertising space in the same newspaper' (Vigevani et al., 2025, p. 26). Even in the remaining countries, owners' interests or newsrooms' need for additional revenues might, at times, interfere with independent journalistic work. In late 2024, for example, the Austrian Press Council highlighted that the bleak financial situation of traditional media outlets 'may be one of the reasons why editorial teams are tempted to include advertising in editorial articles' (Seethaler, 2025, p. 23). The field of online influencers, non-disclosed brand-deals, sponsorships and other forms of disguised advertising pose an increasing problem (Flynn, 2025).

In 22 countries, media owners have significant economic interests in non-media sectors, which might compromise the independence of newsrooms' reporting. At the same time, it is noteworthy that in a handful of countries, for example some of the Nordic Member States, the recorded risks relate to the lack of relevant provisions in (self-)regulation that would describe clear responsibilities for commercial independence. Nevertheless, the lack of these provisions did not, as of yet, lead to significant commercial interference.

EMFA Insight - Editorial Independence (Art. 6.3)

The independence of newsrooms from commercial and owner pressure is one of the key stated goals of the EMFA. The monitoring exercise (Art. 26) described an overview of measures taken by media service providers with a view to guaranteeing the independence of editorial decisions. Art. 6(3) asks that media service providers take measures that 'guarantee that editorial decisions can be taken freely within the established editorial line of the media service provider concerned'. The European Commission Recommendation 2022/1634 lists protections against arbitrary dismissals or disciplinary actions in cases where journalists refuse assignments that they consider to be against profession-

al standards. Only ten countries have a conscience clause that provides social protections to journalists who quit due to commercial pressure. In France, conscience clauses exist but Ouakrat and Bienvenu (2025) see signs that media owners are considering the compensation paid to journalists who leave their newsrooms as the cost required “to radically transform the media outlets they acquire”. At the same time, they mention that “nothing guarantees [that journalists] later find a job in a growingly precarious and concentrated market” (Ouakrat & Bienvenu, 2025, p. 26). Eighteen countries have laws or self-regulation that allow journalists to refuse doing tasks they do not consider to be in line with journalistic ethics, however, only seven of them consider these safeguards successful. In recent years, a number of countries have seen the establishment of whistle-blowing processes inside newsrooms employing more than 50 people but their effectiveness is not yet proven.

The separation of editorial and commercial activities is an important shield for journalistic autonomy, but it is barely reflected in journalistic codes or practices anymore. A notable example is the Netherlands, one of the few countries where experts observed the existence of an effective ‘Chinese wall’ between the commercial and the editorial divisions of media companies (De Swert et al., 2025, p. 37). EMFA Art. 6/3b also mentions that it is the duty of media publishers to ‘ensure that any actual or potential conflicts of interest that might affect the provision of news and current affairs content are disclosed’. Despite such conflicts of interest being common across the countries covered, there aren’t many cases in which news media proactively report about their owners’ financial interests.

3.2. Three focuses on Market Plurality

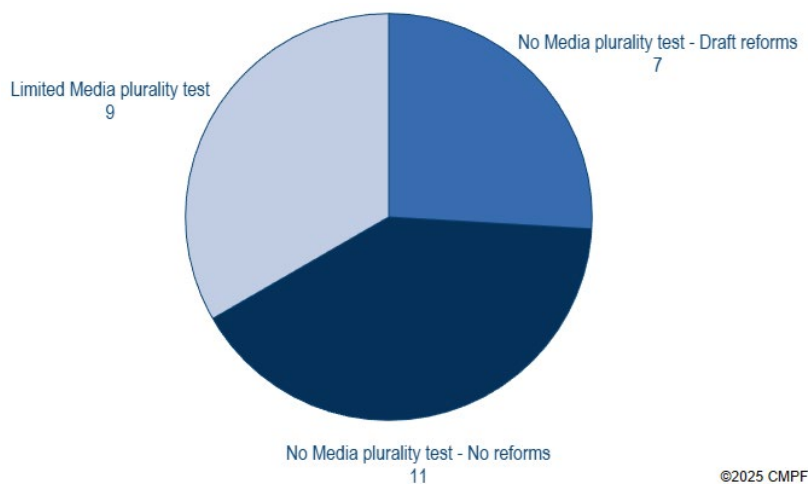
3.2.1 - Focus on Concentration of Media Ownership - Are EU Countries Ready for the Media Plurality Test? (Art. 22 EMFA)

As assessed in the implementation of the Media Pluralism Monitor over the last ten years, the concentration of media ownership has always been a major source of risk for media market plurality (Carlini et al., 2024). The previous implementations of the MPM also highlighted the fragmentation of the national regulatory frameworks aimed at tackling media ownership concentration. With the aim of establishing a common framework for assessing media market concentration across the Union, Art. 22 of EMFA requires the introduction of specific rules and procedures ‘which allow for an assessment of media market concentrations that could have a significant impact on media pluralism and editorial independence’ (the so-called “media plurality test”). For these mergers, a separate

assessment is required, which would complement the merger evaluation under competition law, assessing the impact of the proposed merger on media pluralism *and* editorial independence. The criteria of these rules, and the elements that must be taken into consideration, are listed in art. 22(2). (Kerševan, 2024; Manganelli & Mariniello, 2024; Sznajder, 2024; Seipp et al., 2024; Stasi, 2025).

Even though this obligation was not in force in the year of this assessment, and while still waiting for the Commission, assisted by the European Board for Media Services, to issue the guidelines, the results of the MPM data collection make the tracking of the situation and its evolution in EU countries possible, as regarding the rules and procedures applied at national level to evaluate the mergers involving media (assessed by variable 65 of the MPM questionnaire). In 18 countries, there are no media-specific rules, and only the general competition law applies. In nine countries, there are rules and procedures that ask the regulatory authority (or in some cases also the same competition authority) to consider the impact of the proposed merger on media pluralism, but these rules do not apply to all the media - in most cases, they are limited to the audiovisual sector -, and/or they do not follow the criteria listed in art. 22. In seven out of the 18 countries that have no media pluralism test, there is an ongoing reform process to adapt national rules to Art. 22.

Figure 3.e. Assessment of media market concentrations in EU countries



In many of the countries that have, in their national legal framework, a separate assessment on media mergers, assessments of media market concentrations are only required for some media sectors; indeed, the digital environment of the media is rarely taken into consideration, as the relevant legislation was historically introduced to address media

market power in the television sector. Moreover, art. 22 strictly connects the objective of media pluralism with safeguarding editorial independence. The latter may be seen as having a ‘double role’, as ‘a value to be preserved and, at the same time, an effective structural remedy (...) enabling the media authorities (or NRAs) to allow mergers when there are credible permanent commitments of the merged entity to guarantee ex-post internal pluralism and editorial independence’. (Carlini & Parcu, 2024).

Among the countries that already have rules and procedures to assess the existence of positions of market power that may harm pluralism, the cases of Italy and Germany may be mentioned. In Italy, where the media system is characterised by a high concentration of media ownership in the audiovisual sector and frequent cases of mixed interests between media and non-media businesses, in 2024 the media authority (AGCOM) ‘adopted guidelines to assess the existence of significant market power positions that could harm pluralism (Resolution 66/24/CONS). Some media law experts have noted that “the AGCOM guidelines may likely serve as a reference model for the future adoption of the Commission’s guidelines for the market plurality test required by the EMFA” (Manganelli & Mariniello, 2024, p. 171). However, it should be noted that under current regulations, the pluralism impact assessment established by Italian law does not explicitly include criteria referring to editorial independence as a distinct concept from media pluralism’ (Vigevani et al. 2025, p. 46). Under this respect, the Italian regulation does not appear to fully comply with the criteria established by Art. 22 of the EMFA.

In Germany, the procedure for the assessment of mergers involving media companies, separate from competition law, is set out in the Interstate Media Treaty, and is based on the audience share of the involved companies. However,

[C]ritics argue that the television-centric focus and the generous ‘bonus rules’ render German media concentration laws increasingly disconnected from current media realities (...). While the media authorities play a vital role in monitoring media pluralism, its influence is primarily limited to broadcast media, and its mandate has not been substantially expanded to cover online platforms or digital-native media. Recognizing these shortcomings, policymakers have acknowledged the need for reform. (...) The Interstate Media Treaty’s Additional Protocol (2020) explicitly commits the federal states to establishing a sustainable media concentration framework. But this political declaration of intent has so far had no consequences. (Kalbhenn, 2025, pp. 39-40).

An indirect and limited form of the ‘media pluralism test’ appeared recently in a Dutch case. The media concentrations in the Netherlands are evaluated under the general basis of competition law, and the authority in charge of this is the ACM (Autoriteit Consument en Markt, the Authority for Consumers and Markets). In the past, the ACM always made its decisions based only on economic factors. However, in the proposed merger

between two media companies, RTL and DPG Media (which was under review at the time of the MPM implementation), the competition authority ‘ask[ed] for advice of the Commissariaat voor de Media, which also pointed out potential risks for the diversity and quality of the news that is being offered at the Dutch Market, laying more focus on content pluralism (diversity of news content)’ (De Swert et al., 2025, p. 37)). As highlighted in the Dutch MPM report, this choice is in line with a policy oriented towards protecting and fostering a pluralist media landscape, but it may also face some legal constraints: ‘The solution could lay in thoroughly implementing the requirements of EMFA art. 22, more concretely to specifically refer to impact on media pluralism and editorial independence in the legal framework that forms the basis for ACM’s work when they evaluate mergers in the media sector’ (ib.).

The need to revise the current legislation, as largely debated in scholarly and political discourses, is also highlighted in France, where there is a strong media market concentration that raises concerns on media pluralism and press independence. ‘The existing regulation poses limitations and thresholds on the press and audiovisual sector, and also limits foreign ownership, but their effectiveness can be questioned. Moreover, the regulation does not directly address the link between market concentration and media pluralism, lagging behind on the EMFA requirements. Print and online press do not have their own regulatory authority, though the ARCOM can intervene in cases of cross-media concentration and audiovisual. ARCOM’s sanctions, even when financially significant, have little impact. Despite legal restrictions limiting ownership concentration, a few dominant conglomerates at the hands of powerful economic tycoons exert overwhelming control across different media sectors.’ (Ouakrat & Bienvenu, 2025, p. 45).

In Spain, the government proposed an ‘Action Plan for Democracy’ in September 2024. Researchers Suau Martinez et al., have written about the proposal, and argue that ‘it indicated that this plan provides for a “review of the regulatory framework to guarantee pluralism by avoiding media concentration”.’ However, the ‘statement recognises that there is an issue regarding media concentration, but does not suggest any specific proposal on what measures are intended to be taken to combat this concentration.’ (Suau Martinez et al., 2025, p. 20).

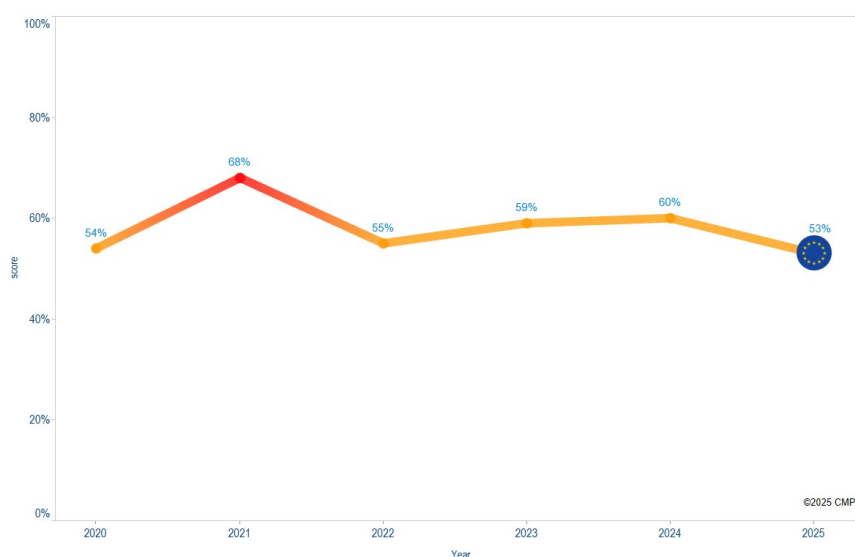
Finally, the case of Poland must be highlighted, as an example of the risks related to the lack of a media-specific legal framework to evaluate media market operations. ‘Institutional and procedural gaps in competition law and market plurality rules, led to the unprecedented decision of PM Donald Tusk in December 2024 to add two large commercial TV companies in Poland (TVN, Polsat) to the list of strategic entities eligible for the protection of authorities and requiring approval from the government before changing ownership in any way.’ (Klimkiewicz 2025, p. 5). This decision originated in a complicated scenario and may have risky implications.

The legal basis was the 2024 Regulation of the Council of Ministers of 18 December 2024 on the list of entities subject to protection and their competent control authorities. In practice the administrative protection means that a potential ownership change or takeover must be accepted by the government. The PM's decision was preceded by media speculations that TVN may be taken over by Hungarian or Hungarian-Czech capital, as well as the dispute within the family of the founder of Telewizja Polsat and the possibility of its hostile takeover. The case also showed difficulty of balancing state intervention and protection of national security. Politicians of oppositional parties, including Law and Justice and Confederation, criticised the decision comparing government regulation with communist practices. On the other hand, Polsat's owner, Zygmunt Solorz, expressed satisfaction and support for the government's plan regarding the station. Likewise, a former US Ambassador to Poland (TVN belongs to US-owned Warner Bros. Discovery) largely supported the government decisions. (Klimkiewicz, 2025, p. 20).

3.2.2. Focus on Financing Media: An Ongoing Struggle

Surprisingly, in light of the ongoing crisis of the media market, the indicator on *Media viability* shows a visible decrease in risk for EU members, from 60% in 2024 to 53% in the MPM 2025. This is largely due to the stabilisation of the media markets after the decrease in revenues caused by the COVID-19 pandemic and the rising prices that followed Russia's war of aggression in Ukraine. Since many countries only had statistics that reflected the calendar year 2023 at the time of data collection, improvements to this weak financial situation had arguably already started two years ago. The average risk in the countries assessed is, nevertheless, still in the medium-high risk band.

Figure 3.f. The trend of the MPM indicator on Media viability in EU



Note. The graph visualizes the average risk score for the indicator on Media viability in the Media Pluralism Monitor. (Years= year of the MPM implementation. Nb. EU 28 until 2019).

While the print market has in almost every country continued to experience declining revenues and lower circulation numbers, television and radio have proven more resilient, in many cases experiencing some growth in revenues – showing that there is still demand in society. The digital innovations of audio and audiovisual media service providers, such as online streaming services and podcasts are also widely used. In some countries (where digital market revenue is available), it can also be observed that digital news media is strengthening its position in the market. In the Netherlands, for example, the ‘increase in reader market revenue is due to the sharply rising revenue from digital editions, which grew by 25 percent to €152 million’ according to 2023 data on the Dutch media market (De Swert et al., 2025, p. 20). In Lithuania, the number of digital subscribers to news media reached 100,000 (Jastramskis, 2025). Still, at this point, digital media in every country is more reliant on advertising than reader revenues. In any case, the very large online platforms get most of the online advertising revenues and most of the growth in the digital advertising market is also captured by them.

There are some good examples of countries where governments decided to increase their investment in quality journalism. In Lithuania, last year, ‘the PSM (the LRT) financing from the state budget amounted to 72.9 million euros and was 14.8% higher than in 2023’ (Jastramskis, 2025, p. 17). An increasing number of countries have also introduced or updated subsidy schemes for news media. In Latvia, for example, the Media Support Fund’s support volume is constantly increasing, and reached EUR 4.1 million in 2024 – a significant number, considering the small size of the country (Rožukalne & Skulte, 2025). Similarly, Lithuania has increased media support to EUR 6.5 million in the past year (Jastramskis, 2025). For Austria, Seethaler et al. (2025) highlight that despite a long tradition of subsidies for private media, financial support schemes are controversial, and in many news outlets had to close while others were acquired by larger companies, leading to increased concentration of ownership. On a positive note, as of 2024, subsidies were also made available to online media (Seethaler et al., 2025). In many countries, the subsidy schemes are still opaque, and it is not clear under what conditions media can access them. In Malta, for example, the media reported that the owners of large newspapers were negotiating ‘behind closed doors’ with the government to determine how the subsidies will be allocated (Palmer and Bleyer-Simon, 2025).

The viability of the journalistic profession is still problematic. Even if there were fewer major media closures and lay-offs reported than in past years, the number of employed journalists is below the level of the early 2000s. Many newsrooms struggle with attracting talent, as they are unable to afford paying the salaries that would correspond to the skillset of experienced journalists. Freelance journalists continue to be among the most vulnerable practitioners in the sector. In Austria, despite the existence of a collective agreement that defines the minimum rates for freelance journalists, their level of remuneration varies across media outlets. ‘Freelancers work in a grey area, and little is known about the specific economic conditions under which they work. According to the Journal-

ists' Union, no data is available' (Seethaler et al., 2025, p. 23). In France, it was reported that the median salary of freelancers is 12% below what it was 15 years ago (Ouakrat & Bienvenu, 2025).

While there was no significant deterioration in the last year, there are signs that the next years might bring new challenges, as European societies tackle a slowing economy and an increasing demand to invest in military and defence infrastructures. In Finland, for example, 156 journalists of the public service broadcaster Yle are expected to be let go. In Estonia, a 5% cut to the financing of the public service ERR was envisioned for the year 2025 (Jõesaar & Konno, 2025). The Dutch public service media is expected to reduce its budget by 15% in 2027 (De Swert et al., 2025).

Across the countries covered, we can see that digital media in particular, are experimenting with new revenues and new modes of delivering their services. Grants, reader revenues and donations are commonly experimented. Non-traditional actors are especially successful, as shown by the example of Poland, where 'news youtubers and podcasters have built sustainable financing and audiences larger than traditional legacy media – e.g. YouTube channel Kanał Planeta Faktów (2.74 million subscriptions), Kanał Zero by former sports journalist Krzysztof Stanowski (1.4 million subscriptions) and Łukasz Bok on Instagram (1 million followers)' (Klimkiewicz, 2025, p. 22). Ouakrat & Bienvenu (2025, p. 25) describe, based on the French experience, the possible shortcomings of new revenue streams: 'Although original, citizen and positive, such alternative funding plans are time-monger for the media and divert them from their main mission: to inform. They are uncertain, since every new campaign needs to meet its goal to reconduct the media activity for one more year. Eventually, they also lead to the creation of a 'competitive market of donations' that plays against media pluralism.' At the same time, France provides a good example of the effective use of AI in newsrooms. As in many other countries across the MPM sample, France's media outlets experiment with incorporating Artificial Intelligence tools in the daily workflow of their staff, but to limit potential harms a number of newsrooms have already adopted charters that guide media workers in this exercise (Ouakrat & Bienvenu, 2025).

3.2.3. Focus on The Economic Relationships Between Media, Platforms and AI Companies: Is the Price Fair?

The impact of digital transformation on media markets goes far beyond the competition of digital intermediaries in the advertising market and the consequent disruption of the traditional media business model. Other elements contribute to the complex economic relationships between publishers and online platforms (OECD, 2021), the most relevant being the value of media content and its remuneration (Holder et al., 2023). This long-lasting issue has seen relevant developments in the year of this assessment.

On the one hand, the growth of generative AI systems has led to new sources of litigation (and negotiations) over the remuneration of media content used to train LLMs (large language models); these issues added up to the dispute on the remuneration of media content disseminated via – and monetised by – social networks, search engines and automatic aggregators. In 2025, Google conducted an experiment involving 1% of users in eight EU countries (Italy, Spain, Poland, The Netherlands, Belgium, Greece, Denmark, and Croatia). The company interpreted the results as if news content had little impact on its advertising revenue (Liu, 2025). However, both the experiment and the conclusions were criticised by experts on the media industry side (Maher, 2025).

On the other hand, the regulatory framework also evolved, with the first year of full implementation of the Digital Markets Act, which imposes transparency and data sharing obligations on the digital gatekeepers with the aim of improving fairness in digital markets (Art.5 Regulation (EU) 2022/1925 of the European Parliament and of the Council); and with the entry in force of the Artificial Intelligence Act, which obliges the providers of General-Purpose AI models (among other obligations) to implement policies to comply with the EU law on copyright and related rights (Art. 53 Regulation (EU) 2024/1689 of the European Parliament and of the Council).

From 2021 the MPM introduced a variable aimed at assessing the enforcement of copyright protection and, more generally, the state of negotiations and/or agreements between publishers and platforms. In this year's implementation, another variable has been added, specifically related to the economic impact of AI on media financing models. Both the variables, together with questions on pro-competition initiatives by Member States, and on digital taxation, concur to assess the risk related to (un)fair distribution of economic resources in the digital media markets.

According to the MPM2025 results, in eight EU countries (Croatia, Estonia, Latvia, Lithuania, Luxembourg, Poland, Romania and Slovakia), there are no ongoing negotiations between publishers and platforms to remunerate the use of media content. In 18 countries there are negotiations and/or agreements, but these are limited to a few media groups, and in most cases there is not enough information on the details of such agreements—which adds opacity to a market that already lacks transparency. There is just

one country that reports a well-developed and transparent process of copyright remuneration: Sweden. ‘The implementation of the directive 2019/790 into Swedish law should ensure that newspaper companies should be able to receive compensation when their material is reused on the internet. The Swedish Parliament has also decided that the government should appoint an inquiry to review copyright legislation in relation to AI’s learning from copyrighted material and has informed the government of this decision.’ (Färdigh, 2025, p. 16).

In France, ‘regulatory actions intensified in 2024, notably with a €250M fine against Google for violating commitments under the 2019 law on related rights, prompting ongoing investigations into digital platforms. French media launched legal offensives against X, Microsoft, and LinkedIn for unpaid content usage, while journalists’ unions secured revenue-sharing agreements with Google and Meta’ (Ouakrat & Bienvenu, 2025, pp. 23-24). Some criticism emerged regarding the exclusion of the most precarious journalists from these benefits in some cases, as well as regarding the opacity of the details of the content and the amount of such agreements.

Denmark presents an interesting case of collective bargaining, aimed at involving all the media and journalists in the negotiating process. ‘In 2024, the Ministry of Culture established a committee to revise the media support system, and the Danish Press Publications Collective Management Organisation (DPCMO) has actively pursued copyright protection and fair compensation through legal actions and negotiations with tech platforms. DPCMO has also criticized Google’s news access restrictions and called on the EU to strengthen regulatory frameworks addressing digital market dominance and AI governance’. (Simonsen, 2025, pp. 20-21).

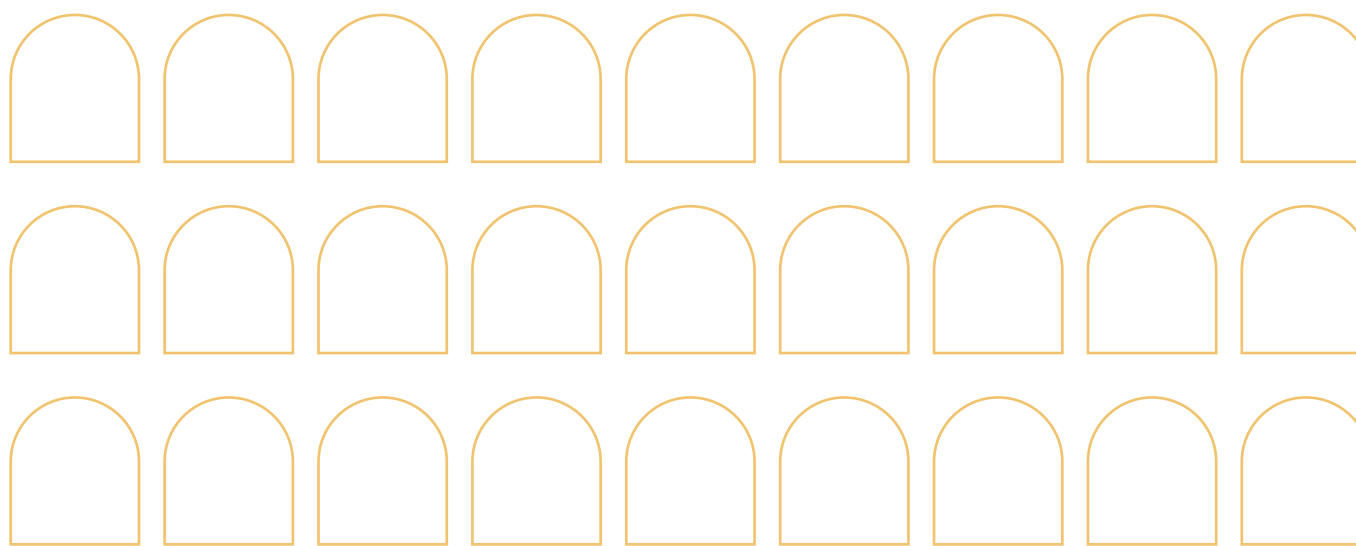
The Czech Republic reported difficulties in the enforcement of copyright protection. Štětka et al., write that although ‘in January 2024, seventeen Czech publishers established the Czech Publishers’ Licensing Association to represent their interests in negotiations with large online platforms, following the amendment to the Copyright Act (No. 121/2000 Coll.) in December 2022, (...), the preparations of the process of negotiations with the platforms are still in their early stages, and the outcomes remain uncertain” (Štětka et al., 2025, p. 19).

When it comes to the variable on compensation of the media content used to train AI, the situation worsens.

The vast majority of countries (24) report that there are no ongoing negotiations between media and AI companies, or where there are, these are very limited and problematic. In the three countries in which relevant agreements with AI companies have been signed in 2024 - namely, France, Germany and Spain, not by chance the largest media markets in the EU -, they are limited to the mainstream media and are not transparent in their economic and legal details. In Germany, after the ground-breaking deal signed in 2023

by Axel Springer with OpenAI, several similar initiatives were taken. Kalbhenn writes that 'RTL Germany and Perplexity AI have formed a partnership, with ntv and stern brands being the first to be integrated into the search engine, with more RTL products to follow. Similarly, Der Spiegel has entered into an agreement with Perplexity AI. (...) Bertelsmann also signed a deal with OpenAI in early 2025, marking significant AI partnerships with two of Germany's largest media companies' (Kalbhenn, 2025, p. 21). However, there is a downside to these initiatives: 'While German market leaders signed deals with AI Companies, small and independent media outlets risk being increasingly disadvantaged when people shift from using Google Search to relying on AI models since visibility will likely favor larger media companies with licensing deals. This could lead to greater market concentration, as only a few publishers gain prominence in AI-generated outputs'. (ib., p. 21).

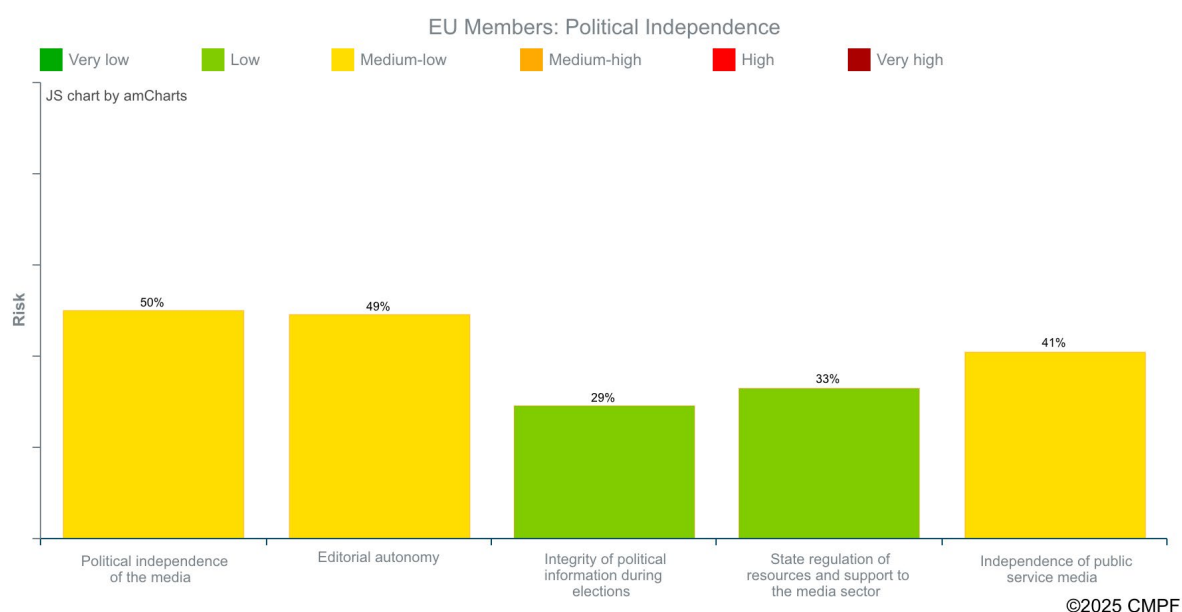
The risk that the AI deals only benefit the larger media outlets is also highlighted in France, where the historical agreement signed by *Le Monde* with OpenAI remained a 'lone rider deal', as Ouakrat & Bienvenu (2025, p. 24) put it when reporting that, following *Le Monde's* case, 'APIG (Alliance de la presse d'information générale) and SEPM (Syndicat des éditeurs de la presse magazine), two press unions representing about 800 titles, asked 25 of the main AI actors (OpenAI, Google, Microsoft, Bytedance, etc.) to open negotiations on the use of their contents. Surprisingly and quite abruptly, OpenAI refused to negotiate and announced to respect the opt-out decided by these media.' (Ouakrat & Bienvenu 2025, pp. 23-24). Similar criticism has been raised in Spain, with the agreement signed in March 2024 between PRISA and OpenAI. As in 2022 with the deal signed between Google and the main publishing groups, the authors of the MPM report that 'the content of these agreements is unknown, [as well as] the amount that the media will receive for their content, which contributes to the opacity of the digital media sector'. (Suau Martinez et al., 2025, p. 21).



CHAPTER 4. Political Independence

4.1. In-depth results

Figure 4.a. Political Independence area - Averages per indicator



Political capture of the media emerges as an intricate and often interrelated set of factors, ranging from structural vulnerabilities traditionally affecting European media systems, to new mechanisms for control or projecting influence. The area findings indicate that sources of concern persist, and they derive from all the five indicators under analysis. Three of them particularly (*Political independence of the media*, *Editorial autonomy*, and *Independence of public service media*) emerge as being particularly problematic, reflecting the impact of several sources of influence in both private and public service

media. Only two countries are detected as being at a high-risk level: Hungary, and Malta. However, another seven EU countries, mostly recent Member States from former socialist systems, follow rather closely behind in the medium-high band: Romania, Cyprus, Greece, Poland, Slovenia, Bulgaria, and Croatia. While in the medium-low band, Slovakia, Italy, France, Latvia, Spain, and The Czech Republic also demonstrate significant sources of risk. Eleven countries range in the low-risk zone: Austria, Luxembourg, Finland, Portugal, Estonia, Ireland, Lithuania, Denmark, Sweden, The Netherlands, and Belgium. Only one country, Germany, is assessed as being at a very low risk.

POLITICAL INDEPENDENCE OF THE MEDIA

MEDIUM - LOW RISK

The Political independence of the media indicator assesses the availability and effective implementation of regulatory safeguards against direct and indirect control of the media by political actors (e.g. political parties, or individual politicians), including governmental actors.

The *Political independence of the media* indicator scored a medium-low risk score of 50%, indicating worrying levels of political control and influence exerted through ownership/management means. Concerning examples are reported all over Europe, ranging from direct or indirect political ownership –including from governmental actors– to state control over main news agencies. The analysis returns an alarming picture, especially at the local level, since in many countries local and/or regional media are funded or owned by municipalities, with their content being skewed in favour of the current local/regional political representation (e.g. Slovakia, The Czech Republic, Luxembourg, Poland, and Croatia).

Blatant cases of conflict of interest and direct control are not rarely observed at the national level either. Malta rates at the top of this negative list, where the media system is severely captured by the main parties (Palmer & Bleier-Simon, 2025). In Austria, growing risks are reported with digital natives (Seethaler et al., 2025), especially with those that are part of the right-wing Freedom Party's media empire (Paulitsch, 2025). In Italy, the Tosinvest group –whose patriarch, Antonio Angelucci, is currently serving for the governmental majority– swiftly created a right-wing pole in the newspaper sector. A worrying situation is also detected in the Trentino Alto Adige region, since the concentration of several local publications under the Athesia Group, controlled by the Südtiroler Volkspartei leader, Michl Ebner (Vigevani et al., 2025).

However, the grip exerted on media by political actors in Europe is chiefly maintained through proxies, such as family members, lawyers, and businesspeople. In fact, while governmental ownership and control is at least partly restricted by national conflict of

interest provisions, indirect control is far more unregulated and backed by a severe lack of transparency and public accountability over clientelist networks. In France, Bolloré's media empire continues to promote narratives aligned with the far-right (Ouakrat & Bienvenu, 2025). In Greece several media moguls are linked to the ruling New Democracy Party (Papadopoulou & Angelou, 2025). In Bulgaria, growing concerns are being detected in the digital media sphere, with two of the most visited websites (Blitz and Pik) suspected of being controlled by MP Delyan Peevski (Spasov et al., 2025).

Besides all this, some regulatory setbacks have also been observed. In The Czech Republic, the risk level climbed back following a decision by the Czech Constitutional Court in December 2024, which 'annulled the amendment to the existing Act on the Conflict of Interests (Nr 159/2006 Coll.) from 2003. This reopened legal pathways for politicians becoming de-facto media owners again' (Štetka et al., 2025, p. 21). Similarly, in Cyprus, the lifting of almost every barrier against ownership control from the Law on Radio and Television organizations of 1998 –already noted in the previous MPM– reinstated compatibility between an official post and shareholding in electronic or print media (Christophorou & Karides, 2025). On a positive note, in Latvia, Local Government Law, which entered into force in 2023, excluded municipal information leaflets or other formats from the possibility of registering as media from the relevant register. (Rožukalne & Skulte, 2025).

This analysis also offers additional insights into peculiar cases detected at the country level and related to the current geopolitical situation. In Poland, TVN and Polsat were included on the list of 'strategic entities that are eligible for the protection of authorities and will need the consent of the government in the case of ownership changes. The decision caused a heated political dispute about the protection of national security and limits of political intervention' (Klimkiewicz, 2025, p.26). (For more on this, see Chapter 3, Focus 1)

EDITORIAL AUTONOMY

MEDIUM - LOW RISK

The Editorial autonomy indicator assesses the existence of regulatory and self-regulatory measures that guarantee freedom from interference in editorial decisions and content.

The result of the indicator *Editorial autonomy* (49%) reflects the concerns raised under *Political independence of the media* and other indicators, as the independence of editorial output can be more easily threatened in newsrooms whose owners have political affiliations, or other connections with political or commercial organizations. Still, this also depends on the quality and effectiveness of national regulatory and self-regulatory pro-

visions aimed at separating the activity of newsrooms from any corruptive source, be it commercial or political. The situation at the EU level speaks clearly, evidencing a generalised weakness of both external and internal mechanisms aimed at protecting editorial independence, save for Northern European countries.

Speaking of external safeguards to editorial autonomy (collective or cross-sectorial Codes, and media councils), the situation shows a fragmented picture. Codes are often sector specific only, and their adoption is generally voluntary. Moreover, relevant bodies have poor enforcement and sanctioning power. Even more problematic is the situation with internal safeguards to editorial autonomy, with many MPM local research teams reporting either a lack, or severe deficiency, of internal Codes and bodies protecting newsroom independence. Similar to the results of other indicators, the risk is tempered by the scores of Northern European countries, where self-regulatory safeguards are assessed as being rather effective in counterbalancing the lack of stronger rules. Contrarily, countries affected by high levels of ownership control or influence, partisan distribution of State resources, or other concerns (for example, Hungary, Greece, Romania, Malta, Croatia, Slovenia, and Slovakia) score higher, driving the overall result to the border of the medium-high band.

Notably, specific provisions aimed at ensuring that the appointment and dismissal of editors-in-chief is free from political interference are lacking or deficient in most Member States. This results in several concerning cases being reported in the country assessments. In Greece, “In 2024, various journalists were dismissed. Although no specific explanations were provided, in some cases terminations appeared linked to political commentary or retaliation against union activity” (Papadopoulou & Angelou, 2025). Strong ideological interference is reported in France (Ouakrat & Bienvenu, 2025). In Italy, one case was reported of an active politician simultaneously serving as editor-in-chief (Vigevani et al., 2025).

INSIGHT - EMFA Recommendations on Internal Safeguards for Editorial Independence and Ownership Transparency

The analysis of the European situation in terms of self-regulation evidences that significant steps have yet to be made to be able to effectively protect editorial content from undue influences. Such steps can be considered following three specific sub dimensions:

1. Provisions for appointments and dismissals of editors-in-chief: almost half of EU Member States demonstrate high or very high risks within this sub dimension, while another third ends up in the medium-low band. This reveals that appointment and dismissal procedures for preventing owners' or any other interference in selecting main editorial figures are either lacking or are improperly designed. This ultimately has worrying effects on editorial content. In very few cases do newsrooms have relevant power to object to appointments, with such processes often occurring behind closed doors. Revolving doors of former politicians taking up editorial roles are not a rare eventuality, while senior editors are often found serving as communication strategists for major politicians – sometimes concomitantly. Even where some stronger provision is present, proper implementation lags.
2. External safeguards: with regards to collective and/or cross-sectorial journalistic self-regulatory provisions and bodies, the analysis detects significant fragmentation. In fact certain safeguards might be available depending on the media sector considered, while other sectors might fall completely unprotected. The power of media councils/ journalistic associations to implement agreed standards (codes of ethics, deontological charts), as well as the financial viability of such bodies, is oftentimes dependent on media's voluntary participation. Moreover, such instruments generally lack real enforcement and sanctioning capability. As such, their role mainly focuses on addressing complaints through dedicated commissions for ethics and arbitration. Violations of ethical and deontological standards are widespread in most EU Member States. However, in Northern European countries (e.g. Sweden, Denmark, The Netherlands, Finland) trust-based frameworks are reported to be extremely powerful, with breaches ending up in significant social repercussions.
3. Internal safeguards: internal mechanisms aimed at ensuring independence of editorial content from political or any other interference – e.g. procedures to signal pressures, rights of opposition, conscience clauses protecting against disciplinary sanctions or arbitrary dismissals of the members of editorial staff – show way more fragmentation. Codes of Ethics and conduct are mostly found in major outlets, while a significant lack of transparency is detected for minor players, in this regard. Moreover, internal bodies – such as editorial boards, ombudspersons, ethics or supervisory committees - are not a common eventuality even for major EU companies. Effectiveness of such safeguards is generally assessed as quite poor, with particularly high levels of risk found in Slovenia, Romania, Malta, Hungary, Greece, and Poland. Again, Northern European countries present the lowest risk scorings.

INTEGRITY OF POLITICAL INFORMATION DURING ELECTIONS

LOW RISK

The indicator on Integrity of political information during elections assesses the existence and implementation of the regulatory and self-regulatory framework for the fair representation of different political actors and viewpoints in audiovisual media and online media and platforms during electoral campaigns.

The *Integrity of political information during elections* presents an overall low risk (29%), indicating a positive performance, overall, of the national audiovisual regulatory systems in safeguarding the right of citizens to receive critical information for the future of their democracies. In the 2024, a major electoral year, most countries scored either in the very low or low bands. Eight scored in the medium-low range, while only two countries fall within higher categories of risk. These are Malta and Hungary, with medium-high and high risk results, respectively.

Safeguards aimed at ensuring fair political communication in audiovisual media during electoral periods are available in all Member States and worked rather well in ensuring fair and balanced representation. However, cases indicating concerns with the proper implementation of these safeguards have emerged in some countries, especially in the private media sphere.

A much debated issue that has emerged in some Member States relates to the time allocated to political candidates and other political representatives who are also carrying out institutional activities, as this risks creating imbalances in media representation. In this regard, a relevant case emerged in Italy, where the RAI Parliamentary Committee, where the governmental coalition holds majority, issued a resolution enabling potential for greater political representation of members of the government speaking on behalf of their institutional role.

The main concern detected within this indicator still relates to online political advertising, and especially to political advertising on online platforms. As a matter of fact, most countries lack robust, targeted regulation, with political parties increasingly relying on platform-based advertising systems to convey their messages. The analysis evidences that this continues to happen in a highly non-transparent manner, both in terms of techniques used for the allocation of political ads, and financial reporting. As a result, half of all EU countries score within medium-high to very high categories of risk, in these specific terms, with only four Member States in the low risk band – although these are still rather close to the medium-low band. (See Focus 1)

STATE REGULATION OF RESOURCES AND
SUPPORT TO THE MEDIA SECTOR

LOW RISK

The indicator State regulation of resources and support to the media sector assesses the legal and practical situation in relation to the distribution of state-managed resources for the media, such as frequency allocation, distribution of direct and indirect subsidies, as well as state advertising.

The indicator *State regulation of resources and support to the media sector* presents an overall low risk. Spectrum allocation generates very low concerns in most of the studied countries, with Hungary being a significant outlier (medium-low band).

Most Member States provide some form of direct public funding to the media, with an allocation method normally based on objective criteria such as circulation size, geographic reach, language, or content type. Some schemes also consider economic vulnerability, innovation goals, and editorial independence. The following EU Member States are identified as lacking any form of direct public support scheme for private media: Romania, The Czech Republic, Bulgaria, Slovakia, and Germany (beyond local media support). For some of them (e.g. Slovakia, The Czech Republic), this is signalled as a relevant deficiency. For Member States providing such support, some degree of concern is detected in terms of capacity and implementation of structural measures. In Portugal, for example, the application of media support measures was affected by the political crisis that led to early elections that were held in May 2025. Moreover, the Media Action Plan falls short of supporting investigative journalism and alternative media (Cádima et al., 2025). Supportive measures for the media have been minimal in Poland for many years, as reported by Klimkiewicz (2025).

More concerning than this, however, is the allocation of state advertising, representing one of the most problematic issues detected by the MPM analysis, with an average risk scoring of 75%. Almost all EU countries fall into higher-risk categories. The lack of media specific legal frameworks, and deficiencies with general public procurement schemes enable discretionary decisions by public bodies or state-owned companies to favour pro-government media, often undermining both fair competition and editorial independence. Transparency is severely lacking, with few states disclosing recipient-level data. Media-focused rules are available in very few Member States, and also there is detected room for improvement.

INDEPENDENCE OF PUBLIC SERVICE
MEDIA

MEDIUM - LOW RISK

The Independence of public service media indicator is designed to measure the risks stemming from appointment and dismissal procedures for public service media (PSM) top management and editors-in-chief, as well as the risks arising from the PSM funding mechanisms and procedures. It also looks at the plurality of PSM coverage in the non-electoral period.

Public service media continue to be faced by considerable threats of political capture, as evidenced by the 41% risk scoring. Almost half of the countries assessed fall within higher risk categories. Particularly severe risks are detected for Malta, Hungary, Slovakia, Romania, Poland, Italy, Greece, and Croatia. In these countries, concerns are found in relation to governance and funding procedures of the PSM.

Formal laws or statutory provisions regulating how PSM are governed are present in all Member States. These typically define the structure and appointment procedures for PSM boards, directors-general, or CEOs, as well as defining mandates and responsibilities of oversight bodies, terms for dismissal or renewal of leadership, and rules on the editorial independence of PSMs from government or partisan influence. These procedures, however, are in many cases heavily politicised, based on outdated or ill-designed legislations. Very high risks, in these terms, are found in Spain, Slovakia, Poland, Malta, Italy, Hungary, Greece, Croatia, Bulgaria, and Cyprus. (See Focus 3).

Funding is also often subjected to political considerations, with the relevant sub-indicator scoring in the medium-high band. In many countries (e.g. Hungary, Bulgaria, Slovenia, Slovakia) PSM financing comes directly from the state budget, often without strong safeguards or multi-year guarantees. Annual budget allocations are often decided by the executive or parliamentary majority, enabling financial pressure. This way funding levels can be reduced arbitrarily or delayed, undermining the ability of PSMs to plan or maintain journalistic independence.

Relevant regulatory changes from licence fee-based systems to state budget contributions have been observed in recent years at the national level. This was the case, for example, in Slovakia, where in 2022 the parliament ‘abruptly eliminated license fees without public debate, replacing them with a state budget contribution’ (Urbániková, 2025, p.27); France, where the *redevance audiovisuelle* (broadcasting licence fee) was replaced by a scheme based on VAT; and in Ireland too, which underwent to a mix of direct exchequer funding, licence fee and commercial revenue.

4.2 Three focuses on Political Independence

4.2.1. Focus on The Integrity of Political Information During the 2024 Electoral Year

The year 2024 has been a record year for elections. In June 2024, European citizens voted for their representatives in the European Parliament for the next five years. In addition, several parliamentary and presidential elections were held at the national level. This happened within a political situation characterised by raising geopolitical tensions and unfolding conflicts (the war in Ukraine, the massacre of civilians in Gaza). In such a context, the regulations aimed at ensuring fair political communication on audiovisual media during electoral contests have been rather decently implemented across the EU. Yet, several instances of risk have emerged, especially on commercial media channels, as they are less regulated than public media systems. Such risks, however, are not remotely comparable to the situation detected in the online media sphere, especially with the buyout of political advertising on online platforms, which continues to raise challenges in terms of techniques used for political campaigning, lacking transparency of expenditures and overall threats to the integrity of the electoral process. Unsurprisingly, half of the EU countries score within medium-high to very high categories of risk, in terms of regulation and practices related to online political advertising.

Political Pluralism in Public and Private Audiovisual Media

The regulatory analysis of the audiovisual media sphere shows that two main models were applied to secure a balanced and fair media coverage of parties and candidates in the electoral process. The first model foresees that audiovisual media offer free airtime (e.g. slots) to contestants for presenting their political viewpoints. Such a model mainly applies to PSM and generally goes hand-in-hand with the banning of paid political advertising. In the cases where allocation of specific airtime is foreseen, this is often based on the party size or parliamentary statutes –something that might raise concerns of exclusion of new or smaller parties. In the second model, mostly characteristic of the private sector, the representation of political viewpoints occurs through the selling of paid advertising space. Usually, this must be available to all contending parties on equal rates of payment. Yet, this does not prevent the financial power of contestants from dictating visibility, raising concerns of unequal access bias – be it commercial or political.

While the quality of implementation varied depending on the country under analysis, it can be generally stated that regulation in the EU worked rather well in preventing severe unbalances during the electoral process. The assessment of the PSM realm reveals that two-thirds of the countries fall within the very-low or low risk band. Seven fall within the

medium-low band, while only two (Greece, and Malta) range in higher risk categories. However, as anticipated, it is observed that the private media sphere is generally less secure, with a higher number of countries falling into risky categories (Malta, Hungary, Slovenia, Austria scoring either in high or very-high risk band), and a lower number of countries demonstrating very-low risks (Belgium, Croatia, Estonia, Germany, Ireland, Slovakia, Sweden, The Czech Republic, The Netherlands).

The main issues identified by the MPM 2025 analysis can be summarised as follows:

1. *Exclusion of non-parliamentary contestants.* For example, the Portuguese country team reported that private channels refused to include debates in their programming with candidates without parliamentary representation. Yet, consensus among private and public players was finally reached with the representation of said candidates having been ensured on public television channels (Cádima et al., 2025).
2. *Camouflage of political advertising as a news segment.* In Hungary, unbalanced representation favouring the government was reported for both the non-electoral and electoral periods, and in both public and private broadcast media. For the latest electoral run, a problematic case emerged with the PSM broadcasting political ads disguised as news segments (Bleyer-Simon et al., 2025). In Romania, public awareness and accountability was hindered by an intricate regulatory matrix. As reported by the country team, this made it ‘difficult to distinguish sponsored from non-sponsored content, even in the most regulated (audiovisual) media. One slight improvement of audiovisual rules compared to previous national campaigns was that CNA (National Audiovisual Council) instructed broadcasters to label “electoral shows/broadcasts” as “electoral promotion”, although this is still not as clear as a message that would explicitly say “content sponsored by party x” (Toma et al., 2025, p.25).
3. *Overlap of institutional airtime and political campaigning.* A much-debated issue in some countries relates to the time allocated to political candidates and other political representatives also carrying out institutional activities, which risks creating imbalances in representation. This was the case, for example, in Italy and Cyprus. In Italy, the RAI Parliamentary Committee, where the government coalition holds majority, issued a resolution enabling potential for overrepresentation of members of the government speaking on behalf of their institutional role. In Cyprus, ‘despite the fact that both the law and regulations on the PSM and the one on commercial media provide that activities and political advertising by government officials, which apparently favour a party or candidate should be taken into account for purposes of fair treatment, this is ignored by the regulator’ (Christophorou & Karides, 2025, p.30).

Political Advertising in Online Media and on Platforms

As anticipated, most of the concerns within the indicator on the *Integrity of political information during elections* are related to the buyout of political advertising in the online realm, especially on social media platforms. The MPM has started to take these risks into account in conjunction with the 2019 European elections. Since then, the regulatory and practical situation with online political ad registers among the highest concerns within the whole MPM instrument.

Regulation lags in most Member States. Some countries have attempted to extend their audiovisual regulatory systems to the online sphere, but even in such cases, they prove deficient and outdated. If not otherwise regulated, online political advertising might fall under general campaign finance laws, meaning that some thresholds are defined to limit expenditure – with some reporting requirements being also foreseen. However, this is highly insufficient for ensuring balanced and fair representation. As a result, relevant causes for concern are detected across the EU. This is further complicated by severe problems in terms of transparency, as reporting requirements often do not ask for disaggregation of amounts spent. Half of EU countries score within medium-high to very high categories of risk. The problem is particularly pronounced for online platforms, where the social media activities of parties are assessed as highly opaque both in terms of expenditure and techniques used for campaigning.

Such a major regulatory void is evident across the EU. In Bulgaria, social networks are out of the scope of the Electoral Code, save for the profiles of media outlets (Spasov et al., 2025). In Austria, despite the 2022 amendment of the Political Parties Act, ‘no distinction can be made between ad spending on online editions of traditional media, digital natives, and the global platforms’ (Seethaler et al., 2025, p.29). Similarly, in Finland, the legislation ‘only requires elected or their stand-ins to declare expenses per medium, “information networks” (i.e.) being one single unit’ (Ylikoski & Ala-Fossi, 2025, p.36). In Italy, the regulations ‘only require political parties to disclose their communication expenditures, but there is no obligation to specify the portion of these expenses allocated to social media.’ (Vigevani et al., 2025, p.31). In Slovakia, available regulation can be circumvented as ‘a substantial portion of campaign spending can be “hidden” under payments to advertising agencies without further breakdowns’ (Urbániková, 2025, p.25). This results in major opacity, which is spread all over the EU.

A second point relates specifically to the techniques used to spread political messages on the online platform domain. As the MPM2024 analysis observed, these include micro-targeting practices, the transformation of common interest pages into political ad accounts right before elections, or the use of non-official pages connected to political parties (Rožukalne & Skulte, 2024; Bleyer-Simon et al., 2024). As evidenced by the Czech report, the role of political influencers for electoral campaigning is increasingly detected as a major challenge in democratic political discourse (Zelenka, 2024, as cited in Štetka et al., 2025).

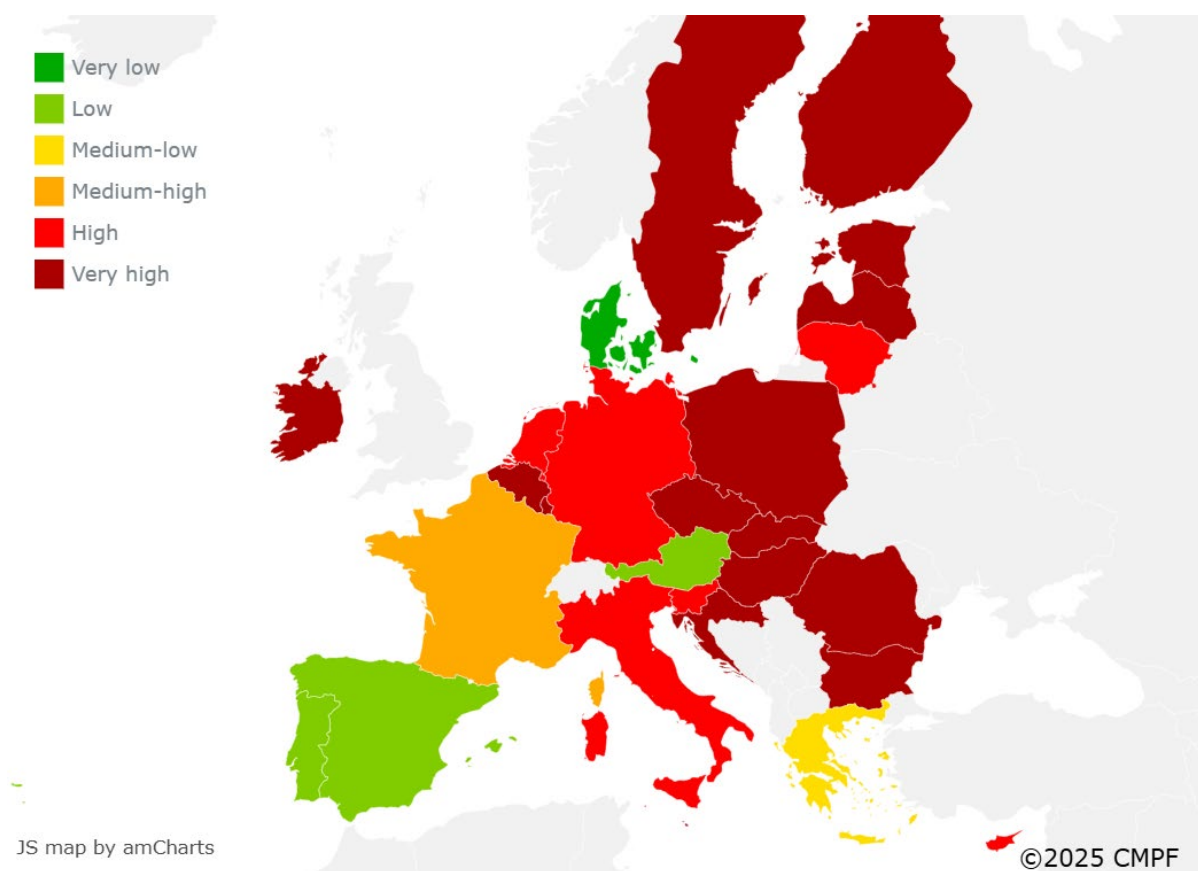
A third issue relates to the opacity with the policies implemented by the same platforms. The Dutch case (Hofman et al., 2023, as cited in De Swert et al., 2025) demonstrated that platforms might not apply equal conditions to electoral contestants, with Meta charging ‘some political parties (like the smaller SGP (...) much more for their advertisements than others (like the bigger VVD)’. Moreover, some countries, such as Poland, report opaque information about political advertising spots –e.g. ‘how many of these were dismissed by the platforms and on what grounds’ (Klimkiewicz, 2025, p.28). Rožukalne & Skulte (2025, p.26) have indicated that “The systems of identification and retrieval of political ads on Google and Meta do not work accurately in the case of Latvian political ads’, while inconsistent transparency by online platforms was also reported in Estonia (Joesaar & Konno, 2025).

Finally, more extreme concerns have emerged in two Member States, Romania and Bulgaria, in relation to problematic propaganda activities on social media platforms and alleged third-country influence, “likely from Russia” (Ross & Popoviciu, 2025). In Romania, this caused the annulment of the presidential election by the Constitutional Court, which in its decision also considered claims from a report submitted to the National Defense Council (CSAT) of influencers being paid to promote candidate Calin Georgescu on TikTok (Toma et al., 2025). This had immediate repercussions for Bulgaria too, which started a parliamentary commission to investigate Russian influence in the country (Nikolov, 2024, as cited in Spassov et al., 2025).

4.2.2. Focus on State Advertising and its Effects on Media Pluralism (Art. 25 EMFA)

The allocation of state advertising remains one of the most significant risk factors for media pluralism in Europe, with almost all EU countries falling into higher risk categories. Only four of them range in lower risk bands: Denmark, Austria, Portugal, Spain. This result reflects a generalised lack of a media-specific framework for state advertising, poor transparency measures and related disclosure, as well as a severe lack of oversight and enforcement mechanisms. Overall, this results in the widespread politicisation of such institutional communication, with heavy consequences in terms of market distortion and editorial independence. In this regard, the results of the MPM highlight that EU countries are generally far from complying with the criteria and obligations posed by the EMFA (art. 25) that will enter into force on 8 August 2025, although some progress has been observed.

Figure 4.b Geographical risk representation for the sub indicator Distribution of state advertising



A Regulatory Overview of State Advertising in the European Union

In terms of legal framework, a clear distinction exists between European Union countries that have adopted some kind of tailored regulation on state advertising, and those where distribution follows only general public procurement rules. The analysis reveals that a small minority of countries (e.g. Austria and Italy) have dedicated legal frameworks or other provisions (such as recommendations, e.g. Slovenia) anchoring the allocation of state advertising to the principle of media pluralism and editorial independence. When available, these rules might define allocation criteria, require equal access or non-discriminatory treatment of media, or mandate public disclosure of advertising contracts and beneficiaries.

However, most countries lack specific state advertising rules, treating it as a standard procurement activity. These procedures might require open bidding, justification for direct awards, as well as budget transparency, but do not include criteria for media-specific fairness or pluralism safeguards. Such procedures are usually launched by a public institution (e.g. a ministry, municipality, or state agency), and can take different semblances

(e.g. an open call for tenders, simplified procedures such as a request for quotes, direct award/exceptions) depending on the contract value. Selection is usually based on price, reach, delivery capacity, or technical expertise, with editorial independence or pluralism being rarely considered as a relevant criteria.

While in principle state advertising should not be considered as a form of subsidisation to the media, as other mechanisms are specifically designed to support the viability of media businesses, its role in terms of media viability has become relevant in many European media systems. This is particularly the case at the local level, where such resources are often essential for local media organisations to survive a deteriorating panorama. This prompted some countries to design specific provisions, so as to ensure that state advertising funds are used to reinvigorate resilience and diversity in the local environment. For instance, Italian regulatory provisions on state advertising address support to local media, with obligations existing to ensure public communication spending to local newspapers, radio and TV. More specifically, ‘at least 15 percent of the resources foreseen in the budget must be in favor of local private television and radio broadcasters, and at least 50 percent in favor of daily newspapers and periodicals’ (Vigevani et al., 2025, p.34).

Overall, the measures presented above –both media specific, or via public procurement– are assessed as highly deficient, ineffective, or distortive in most of the countries under analysis. As criteria are oftentimes detached from specific goals in terms of media pluralism, the application of generic market criteria risks favouring major outlets further distorting the market. Moreover, it is noted that such strict market logic is progressively moving the allocation to VLOPs (Christophorou & Karides, 2025). Furthermore, state-owned companies might not be considered by regulatory provisions, enabling a wide range of discretionary options for directing the distribution along commercial or political preferences. In Italy, for example, ‘public-owned companies are excluded from th[e] advertising regime, despite being the main investors in advertising compared to other public administrations’ (Vigevani et al., 2025, p.35).

Most importantly, regulatory provisions generally fall short of full transparency, severely hindering public accountability. Some countries require and enable the publication of contracts on public procurement platforms, but in many cases there is no obligation for states to publish detailed or disaggregated media recipient data. Concerns are detected not only with the disclosure of financial transactions, but also with the conditions and criteria applied for selecting recipients of state advertising flows. One of the most significant legal developments in these terms concerned Austria, which through recent amendments to the Transparency in Media Cooperation and Funding Act, imposed transparent reporting of all state-funded media campaigns, regardless of media type, publication frequency, or value. Notably, the expanded scope included social media, posters, and cinema advertising, with campaigns over 150.000 EUR requiring a transparency report and impact analysis. Still, no expenditure cap was introduced (Seethaler et al., 2024).

Progress is also observed in the view of the full implementation of Art. 25 EMFA (Allocation of public funds for state advertising and supply or service contracts). In Finland, for example, a government proposal draft foresaw the collection of state advertising data 'into an open access national procurement repository maintained by the State Treasury (...). With this data repository, individual authorities or public entities would not need to publish information on their advertising and notification expenditures themselves' (Ylikoski & Ala-Fossi, 2025). In Ireland, 'it has been mooted that such data may be incorporated into the existing Coimisiún na Meán –supported Mediaownership.ie resource' (Flynn, 2025, p.29).

Practical Effects on Editorial Independence

In practical terms, the allocation of state advertising through state-owned companies or other agencies represents a major concern. As reported in Klimkiewicz (2025, p.29), in Poland these institutions (Bank PKO BP, Bank Pekao SA, Link4, Alior Bank, Orlen and others) were used to channel significant advertising funds to media that was favourable to the former ruling party (PiS). Following the change in government, it is now reported these same institutions tend to allocate 'more diversified advertising funding, including media that were previously omitted by state companies' (wirtualnemedi.pl, 2024c, as cited in Klimkiewicz, 2025, p.29), with transparency remaining a concerning issue (Klimkiewicz, 2025, p.29). Similarly, state advertising has been used in Hungary as a hidden support to government-aligned outlets for years, with several such organisations being almost exclusively financed through this kind of revenue (Mérték, 2024a, as cited in Bleyer-Simon et al., 2025).

Biased allocation also proves extremely concerning at the local level, where institutional communication more blatantly links to political or politicised ownership structures of so-called municipal media. These outlets are in many cases owned, controlled, or aligned to local political representatives, which can direct vital financial resources to their media proxies. Such a situation has been detected in several countries, such as Luxembourg, Poland, the Czech Republic, Croatia, Slovenia, and Slovakia.

Finally, while state advertising should not be political in its content (Nenadić, 2022), some country cases demonstrate how easily this line can blur. In Romania, the press revealed that 'contracts between local institutions and outlets appear to include not just the purchase of advertising space but also of featured interviews, appearances (...)' (Lupu, 2021, as cited in Toma et al., 2025). Moreover, there are allegations that these contracts 'implicitly (or explicitly) purchase positive coverage' (Lupu, 2021, Lupu 2024, as cited in Toma et al., 2025, p.27). In the Czech Republic, the decision of the government to roll out an information campaign sparked concerns, 'given personal ties between the company which received the contract and the ruling party ODS, as well as because the topics that are supposed to be promoted as part of the campaign [were] likely to

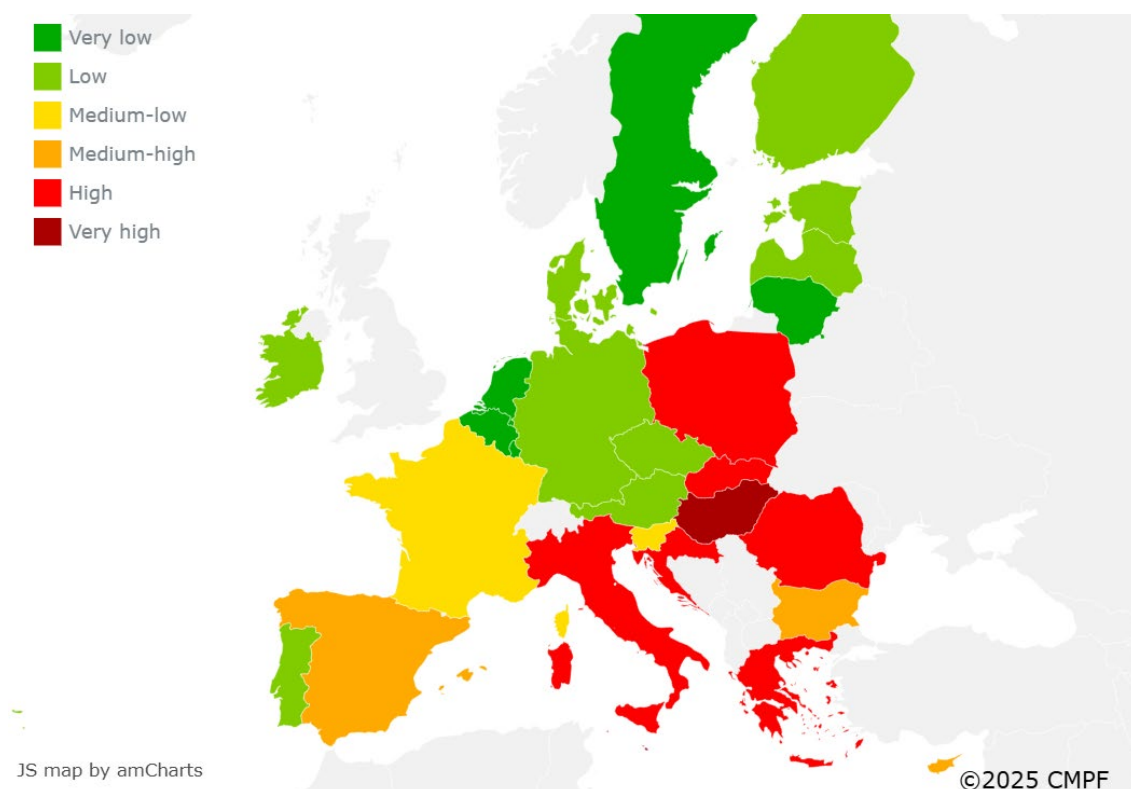
overlap with the focus of government parties' election campaign in September 2025' (Brodničková, 2025, as cited in Štetka et al., 2025, p.23).

4.2.3. Focus on The Independence of Public Service Media (Art. 5 EMFA)

Public service media (PSM) in the European Union should play a central role in guaranteeing informed democratic discourse, by ensuring universal access to accurate, impartial, and diverse information. Unlike commercial outlets driven by market logic, PSM are mandated to serve the public interest, offering content that supports informed citizenship, political pluralism, and social cohesion. Public broadcasters might help counter disinformation, foster civic engagement, and represent minority voices. Their presence is especially vital during elections, when voters need balanced reporting and equal access to political viewpoints.

However, against this ideal picture, the MPM analysis shows that PSM continues to face considerable threats to their independence and their ability to provide citizens with qualitative content. In some cases, they have become an active part of a politically captured system conveying government narratives. To assess the independence of PSMs, the MPM evaluates the legal and practical situation of their governance and funding, as well as the plurality of their coverage. Almost half of the countries assessed fall within higher risk categories, with particularly severe risks being detected for Malta, Hungary, Slovakia, Romania, Poland, Italy, Greece, and Croatia. Yet, significant challenges are found all across the EU.

Figure 4.c Geographical risk representation for the indicator Independence of public service media



The Governance Structures of Public Service Media

Legal safeguards for securing the governance of PSM systems from political interference vary significantly across the EU27. Lower risk countries certainly present some key elements that contribute to a well-functioning governance model, however no European PSM system exhibits a perfectly balanced combination of these positive features.

A first fundamental issue concerns pluralism in the composition of boards of directors and broadcasting councils. In this regard, the MPM highlights that countries falling in lower risk bands usually feature pluralistic boards, with members from a wide range of societal stakeholders (e.g., civil society, academia, trade unions, and so on). This is, for example, the case in Sweden, The Netherlands, Finland, and Slovenia, where recent reforms introduced under the 2023 Public Media Act mandated a new governance structure for RTV Slovenia, with appointments made by civil society institutions, such as universities and journalist associations (Milosavljević & Biljak Gerjevič, 2024). Although these systems still involve political representation (e.g., the governing coalition, the political opposition), they ensure more balance and resilience when it comes to political bargaining.

Conversely, the MPM detects cases where PSM boards are designed to ensure partitioning of top positions on a political basis, rather than with the objective of obtaining effective political and social pluralism and diversity. In many cases, governments or politics take on preponderant roles in these hiring processes, and often such negotiations take place behind closed doors. This is the well-known case of Italy (one of the few outliers among older Member States), where the board is traditionally victim of the systematic division of top positions along party-political lines (the so-called “*lottizzazione*”). This implies the parcelling-out of influence and control, with appointments to RAI’s board of directors, top management, and editorial positions reflecting political affiliation, especially with the governmental majority, as enabled by the provisions of the 2015 law.

The design of the board inevitably links to the parliamentary threshold for PSM appointments (simple vs. two-thirds majority). Generally, a two-third majority is assessed as a best fit for securing the nomination of relevant candidates from political sway, especially if combined with pluralistic and transparent board structures. However, as demonstrated by the Italian reality, this is not always the case. Vice versa, in the absence of compensatory safeguards (e.g., civil society involvement, public tenders, and so on) countries foreseeing a simple majority present more risks of producing politicised boards, thereby compromising editorial independence. A deterioration in this sense has been detected in Spain, where legal amendments in 2024 have envisaged a simple majority for the second round of RTVE’s board appointments, fostering concerns (Suau Martinez et al., 2025). A similar evaluation comes from the Croatian case, where the 2012 passage to a simple majority for the appointment of the Director General of HRT represented a significant deterioration, according to the MPM national country team (Bilić, 2025).

Positive cases are also usually based on open calls for candidacies that are anchored to merit-based criteria, and public hearings. The open and timely advertisement of procedures is paramount to ensure that a wide range of candidates are able to compete. In Portugal, for instance, a public tender process with explicit merit criteria is used for appointing the board of RTP, including a formal evaluation of qualifications (Cádima et al., 2024). In Latvia, shortlisted candidates for LTV (Latvijas Televīzija) leadership are assessed based on competence and public interviews, supporting a transparent merit-based system (Rožukalne & Skulte, 2024).

In addition, countries with staggering systems for PSM top appointments are best secured from abrupt political changes and capture, since board members or top management are appointed at different times rather than all at once. Spain represents a negative case in this context, as the staggering system was dismissed in 2024 following a Royal Decree-Law to reform RTVE's governing board (Suau Martinez et al., 2025). Not least, comprehensive provisions to prevent conflict of interest, accompanied by strong internal mechanisms and bodies aimed at separating editorial structures from management help to contain biased dynamics. In 2024, the Lithuanian parliament adopted an amendment to the law to prevent 'members of municipal councils and members of the European Parliament from becoming members of the LRT Council (until then, ministers, parliamentarians, and mayors were prohibited from doing so), thus reducing possible political influence on LRT management (Gaučaitė-Znutienė, 2024; Law of the Republic of Lithuania on the Lithuanian National Radio and Television, 2024). (Jastramskis, 2025, p.24)

The MPM analysis also highlights that the worst results are accompanied by certain additional features. For example, when the political executive plays a direct role in the appointment of CEOs and Directors. Direct appointment from governmental actors, such as ministries, is the case in Malta (Palmer & Bleyer-Simon, 2025) and is also reported to be the case in Ireland, although levels of concern for Ireland are certainly not equal to the concerns regarding Malta thanks to the functioning of other structural elements. The government might also propose a CEO through a state-controlled entity (e.g., the shareholder assembly), and to secure the appointment through the majority power exerted in another body (e.g. the board of directors, or a supervisory committee). In such a way, it is unlikely that a government-backed candidate will be rejected, due to the majority control in the other entity. This is again the case in Italy, where the CEO is proposed by the Minister of Economy (the major RAI shareholder) and appointed by the board of directors (where the ruling coalition exercises majority power). Following the highly concerning procedure that saw Roberto Sergio replace Giancarlo Fuertes as the CEO of the RAI (see Vigevani et al., 2024), the RAI's top executive position changed again in 2024, with the nomination of the government-backed candidate Gianpaolo Rossi. Besides this change of leadership, the board of directors was also reshuffled along the balance of power in the Italian parliament. Notably, there is currently a stalemate over the finali-

sation of the appointment of the Board's President, due to prolonged political bargaining among the members of the governing majority and opposition representatives in the RAI's supervisory committee, where a two-third majority is required to confirm the decision (Vigevani et al.2025).

The MPM also reports controversial cases of formal dismissals and the subsequent restructuring of the whole PSM system. While aimed at depoliticising the Pis-captured TVP, the 2023 dismantling of Polish PSM caused an uproar as per the legal procedures used for such a move. Since then, the situation with the quality of PSM services seems to be generally improving, with the Ministry of Culture currently working on a new media bill that is apparently moving in the right direction (Klimkiewicz, 2025). This does not seem to be the case in Slovakia, where in July 2024 Radio and Television of Slovakia (RTVS) was formally abolished and replaced by Slovak Television and Radio (STVR), with the declared aim of dismissing RTVS leadership. As reported by Urbániková (2025, p.27), under the new legislation, 'the STVR director-general is no longer elected directly by parliament but by the STVR Council—a change that, in principle, should enhance independence. However, its effectiveness depends on the political independence of the STVR Council itself. Notably, under the new act, all Council members are appointed by the executive branch (four selected by the Ministry of Culture) and the legislative branch (five selected by parliament). In practice, this means the ruling coalition controls the appointments'.

The Funding Mechanisms of Public Service Media

The financial structure of PSM and all related procedures are an equally critical determinant of PSM editorial independence and its ability to fulfil its democratic mandate. Across the EU 27, PSM funding models range from licence fee-based systems, state budget allocations, and mixed mechanisms, coupled with the income generated by commercial activities—usually in part controlled or restricted by law to prevent risks of market distortion.

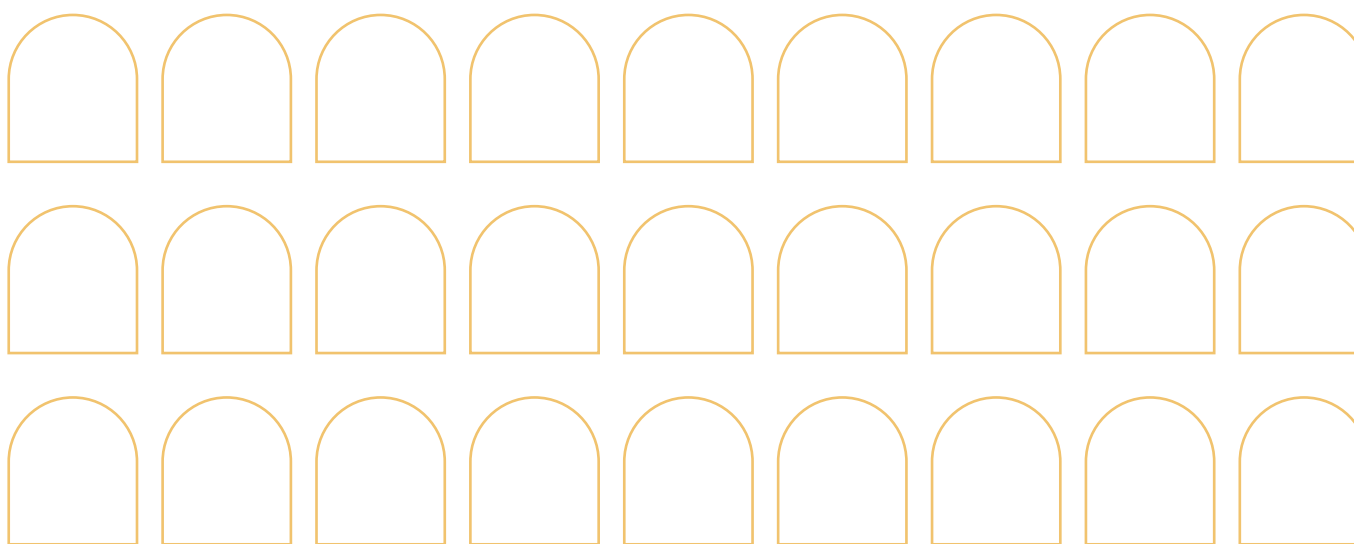
Compared to state budget allocations, well-designed licence fee systems appear as rather effective models for ensuring independent and pluralistic public broadcasting, as they provide relatively stable and predictable funding, while also shielding PSM more effectively from political considerations and influence. However, such models still present relevant challenges related to evasion, cost of collection, and relevance in the digital age. Moreover, they are not exempt from political considerations either. These challenges prompt EU governments to reform such systems or to fill the financial void with state budget contributions, increasing the risk of political discretion and dependency.

In Ireland, a collapse in public trust in RTÉ, the Irish public broadcaster, led to widespread refusal to pay the licence fee, forcing the government to step in with emergen-

cy funding and pushing a debate on a more sustainable funding model. As a result, ‘the Minister for Media announced that, between 2025 and 2027, RTÉ would be funded by a combination of direct exchequer funding, an unreformed broadcast licence fee and commercial revenue’. (Flynn 2025, p. 30). However, this created a situation whereby ‘the level of funding made available to RTÉ will be directly determined by the government of the day’. (Flynn 2025, p. 30) In France, the 2022 suppression of the *redevance audiovisuelle* (broadcasting licence fee) and the new system based on the attribution of a fraction of VAT decided by the government year by year, opened risks ‘of regular changes in the amount distributed to the PSM by the state, a fluctuation that can be indexed to political changes. It also paves the way for various forms of lobbying, to pass amendments in favour of different stakeholders’ (Ouakrat & Bienvenu, 2025, p.35).

Slovenia has recently undertaken positive reforms in PSM governance; however the licence-fee model remains fragile, highlighting the need for integrated reform. In 2024, RTV Slovenija contribution was raised by 10%, while baselines for drafting amendments to the relevant law were also adopted to strengthen, among other things, financial independence. The Minister of Culture also announced that a change of the financing model is being considered (Milosavljević & Biljak Gerjevič, 2025). In Italy, the amount of the licence fee has been traditionally considered insufficient and subject to political considerations. As reported by Vigevani et al. (2025, p.35) ‘revenues from the so-called RAI license fee are not considered sufficient to ensure full financial independence, and recurring proposals to reduce the fee not only act as a veiled threat of political retaliation for unfavourable coverage but also jeopardize the broadcaster’s ability to engage in long-term planning’.

Systems relying on state budget allocations are generally assessed as more at risk, according to the MPM analysis. In general, these systems appear to be more subject to arbitrary reductions or delays, undermining PSM’s ability to plan or maintain journalistic independence. In Bulgaria, the financing of public service BNT and BNR through a state budget subsidy, determined per hour of programming on the basis of a standard endorsed by the Council of Ministers, has for years been assessed as jeopardising the independence of the public service broadcasters. A bill proposed in 2021 to the National Assembly and proposing to finance Bulgarian PSM based on net costs and in accordance with the public service remit, is still pending in parliament (Spasov et al., 2025). In Romania, ‘there are no specific implementation procedures (secondary legislation to clarify the mechanisms of allocation) and thus no criteria for the allocation of funds for PSM from the state budget (...) Moreover, parliamentary approval and rejection of funds are not specifically tied to any evaluation / any rules / or any criteria of performance. Therefore, the allocation of funds remains unpredictable, making it difficult for PSM managers to get into strong positions to negotiate, and impossible to develop multi-year plans’ (Toma et al., 2025).

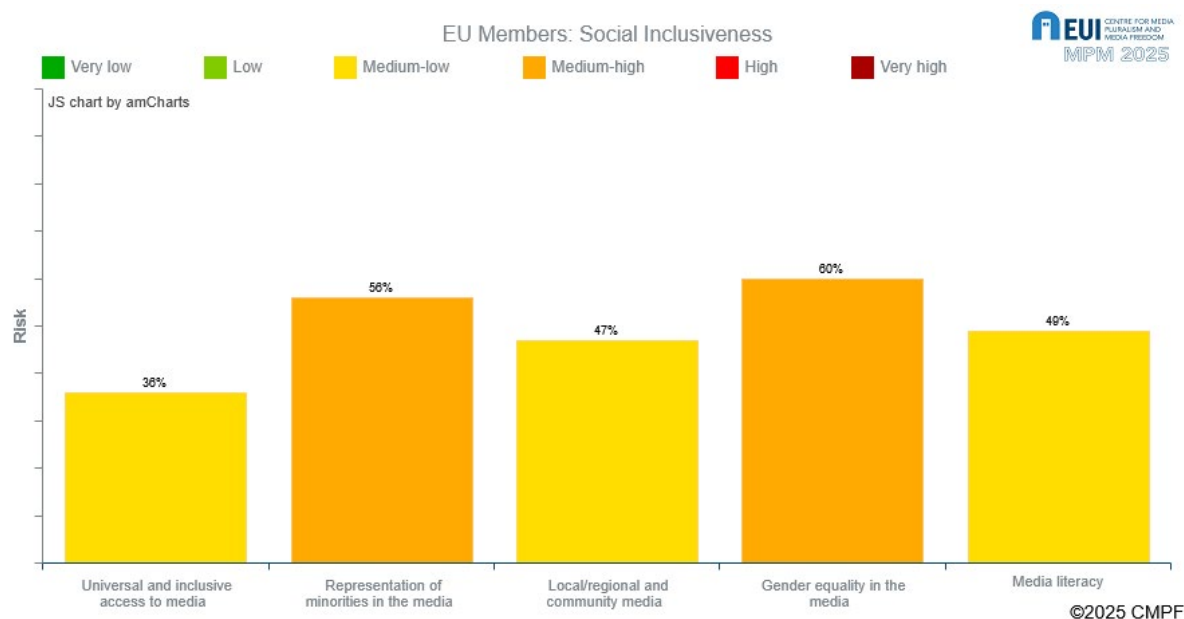


CHAPTER 5. Social Inclusiveness

The Social Inclusiveness area focuses on universal, inclusive and safe access to the media, with a focus on specific groups such as minorities, marginalised communities, local and regional communities, women and people with disabilities. It also examines the level of media literacy skills within a population as well as existing policies and activities to strengthen media literacy as a precondition to inclusiveness.

5.1. In-depth results

Figure 5.a. Social Inclusiveness area - averages per indicator



In line with the average medium-low risk score for the area, all the indicators used to assess **Social Inclusiveness** are assessed between the medium-low risk and the medium-high risk band, avoiding extremes, without underlying one single major risk as absolutely prominent. This confirms that all the EU Member States are making some efforts to guarantee basic inclusiveness.

UNIVERSAL AND INCLUSIVE ACCESS TO MEDIA

MEDIUM - LOW RISK

The indicator on universal and inclusive access to the media re-assesses the risk that stems from any excessively limited traditional TV and radio network coverage, neutral and universal broadband and mobile coverage, and media accessibility for people with disabilities.

The universal coverage of public service (PSM) is guaranteed and ensured in practice in all the EU Member States. However, theoretical discussions and practical initiatives to ensure the appropriate prominence of the content of public interest produced by PSM online remains nascent in the vast majority of EU Member States. Germany was one of the first countries to take measures regarding the 'appropriate prominence' of PSM content online. According to Kalbhenn, (2025, p. 32), the State Media Treaty (§ 84) has contained a findability rule since 2020, which forces certain digital platforms to make PSM prominent and easily findable on their user interface. Linear broadcasting offerings must also always be findable on the 'first page' of search results and catalogue. Media authorities, which monitor compliance with the legislation, have not reported irregularities so far. Besides, the platforms are working with the supervisory authorities to develop a common understanding for implementation.

In terms of media accessibility for people with disabilities, all the EU Member States have adopted a legal framework to guarantee media accessibility, but their application could be improved in most countries. For example, the legal obligations for audiovisual media service providers in terms of media accessibility support can be considered as extremely low in terms of quantity in Luxembourg (Lukasik & Kies, 2025), Malta (Palmer & Bleyer-Simon, 2025) and Romania (Toma et al., 2025). The support available for visually impaired people in audiovisual media remains the main issue, which is insufficient, except in Sweden. Sweden is a good example of best practices in terms of media accessibility: the Swedish PSM, SVT, has the 'read text' service (for people who have difficulty reading the text strip) on SVT1, SVT2, the Knowledge Channel and SVT Barn / SVT24 for those who watch TV via the digital terrestrial network (not HD TV). SVT also provides audio-descriptions on both terrestrial TV and via SVT Play on the web, on mobiles, on tablets or via Apple TV and Google TV; likewise, the commercial company TV4 also follows this model.

REPRESENTATION OF MINORITIES IN THE MEDIA

MEDIUM - HIGH RISK

The indicator on Representation of minorities in the media focuses on the inclusive and safe representation of minorities - whether legally-recognised or marginalised communities - in public service media and private broadcasters. Existing protections against hate speech are assessed in this indicator, as a precondition to a safe media environment.

The representation of legally recognised minorities is usually guaranteed by public service media in most countries, despite some differences in practice, and most of the EU member states provide news in minority languages. However, the situation remains complicated. For example, in Croatia, Bilić (2025) highlights that HRT's service contract for 2023-2027 (Article 49) obliges the company to provide minority-language news on regional radio channels in Pula (Italian), Rijeka (Italian), Osijek (Hungarian and Slovak), and programs dedicated to Serbian and Bosnian minorities in Knin and Dubrovnik. Yet, the programming is deemed as insufficient by experts and minority representatives. A report by the ombudswoman (2024b, cited in Bilić, 2025) considered the minority newsroom as understaffed and underfunded.

The representation of marginalised communities is more problematic. Only half of the countries studied have adopted a comprehensive diversity policy to promote the representation of marginalised communities in media content and media production. Finnish PSM Yle stands out in matters of representation of marginalised communities. According to Ylikoski et Ala-Fossi (2025), Yle's diversity analytics tool monitors news topics related to different communities. In 2024, this monitoring demonstrated that Yle had written dozens of news pieces covering disability, sexual and gender minorities, and Roma people.

In terms of protection against hate speech, most of the EU Member States have adopted a legal framework to regulate hate speech, yet in many cases it is not specifically designed to target hate speech online and hence remains quite ineffective in the online context. In Estonia, 'the criminalization of hate speech has not yet been incorporated into Estonian law due to significant political tensions, with opponents viewing the proposed amendment as a direct threat to freedom of expression' (Joesaar, 2025, p.5). It is important to highlight that the role played by VSPs and VLOPs to limit the spread of hate speech is considered as largely inexistent, as, based on the research of MPM teams, there is no data is available regarding this issue in more than half of the EU Member States.

LOCAL/REGIONAL AND COMMUNITY MEDIA

MEDIUM - LOW RISK

The local/regional and community media indicator assesses whether local and regional communities are guaranteed access to the media (including community media), both in terms of legal safeguards and policy or financial support.

While the coverage of local news by public service media is assessed on average at low risk in the European Union, it still remains a problem in a small minority of countries, including Ireland, Latvia, Spain and Hungary. Hungary is the only country to score within the very high-risk band given the disappearance of local PSM branches and the risk of media capture. According to Bleyer-Simon et al. (2025, citing Klubrádió, 2019; Doros, Ungár & Vas, 2019), 'to cover local developments, the PSM worked in cooperation with local TV stations. But these television stations are run by local municipalities and are thus politically influenced. After some municipalities were won by the opposition after the 2019 local election, the PSM decided to put an end to its cooperation with the stations of said municipalities.'

As far as local commercial media are concerned, the main risk to media pluralism is the sustainability and viability of small local outlets. More than half of the countries score within the very high risk band. Over the years, the number of local media outlets has shrunk due to financial difficulties, loss of advertising revenues and reduction of their audience. As an example of good practice, Sweden succeeded in improving the deteriorating trend toward the supply of local media thanks to the new Swedish media support programme (Färdigh, 2025). This scheme aims to support plural and high-quality local journalism as a key element of a solid democracy in areas that lack or have weak journalistic coverage. The grants are technology-neutral and should be available to general news media regardless of content or distribution. The allocation for media support in 2025 is approximately one billion kronor and the Media Support Committee has not had to prioritize between the applicants, as the allocation has been sufficient for those deemed to meet the criteria. However, the expected positive effects of this scheme in the long run will have to be closely monitored. For the moment, the supply of local information still depends on large media actors such as Swedish PSM and TV4.

In terms of community media, the main issue, in line with previous years research (Palmer & Seethaler, 2025), remains the existence of an adequate and up to date legal framework to favour the development of community media. In the absence of a legal framework, community media tend to struggle to gain adequate access to infrastructures and funding. Eleven EU member states have still not legally recognised community media.

GENDER EQUALITY IN THE MEDIA

MEDIUM - HIGH RISK

The indicator on gender equality in the media 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, both in public service media and private companies, at the national and local level.

Without surprise, the representation of women in the media remains the weakest point for most countries in terms of Social Inclusiveness. The representation of women in the media has always been one of the main risk factors since the first implementation of the MPM (Palmer & Urbániková, 2025), reflecting both quantitative and qualitative gender imbalances in management positions and in media representation.

Women tend to be better represented in PSM management - with an average medium-low risk - than in the management of private broadcasting companies, which are associated with a medium-high average risk and a median risk within the high risk. Parity at the highest management level of PSM (including executive positions and management boards) is reached in most countries. Among Western and Southern European countries, Italy performs particularly poorly on this indicator, as it has a mainly male board of directors in RAI (5 out of 7 directors are men), and two men in executive positions, CEO and Director of the Board. The situation could have been improved by the nomination of Simona Agnes as President of the Board, but the nomination is currently blocked in parliament, as the proposal only came from the majority without involving the opposition (Vigevani et al., 2025). It is interesting to note that in 2024, Rai Way obtained a certification for its Gender Equality Management System. However, the good practices of RaiWai did not seem to be extended to the editorial part of the companies. There are no women among the directors of the news departments; of the 12 radio channels, only 3 have female leaders; and of the 15 gender-related structures, only 2 are led by women (Vigevani et al., 2025).

MEDIA LITERACY

MEDIUM - LOW RISK

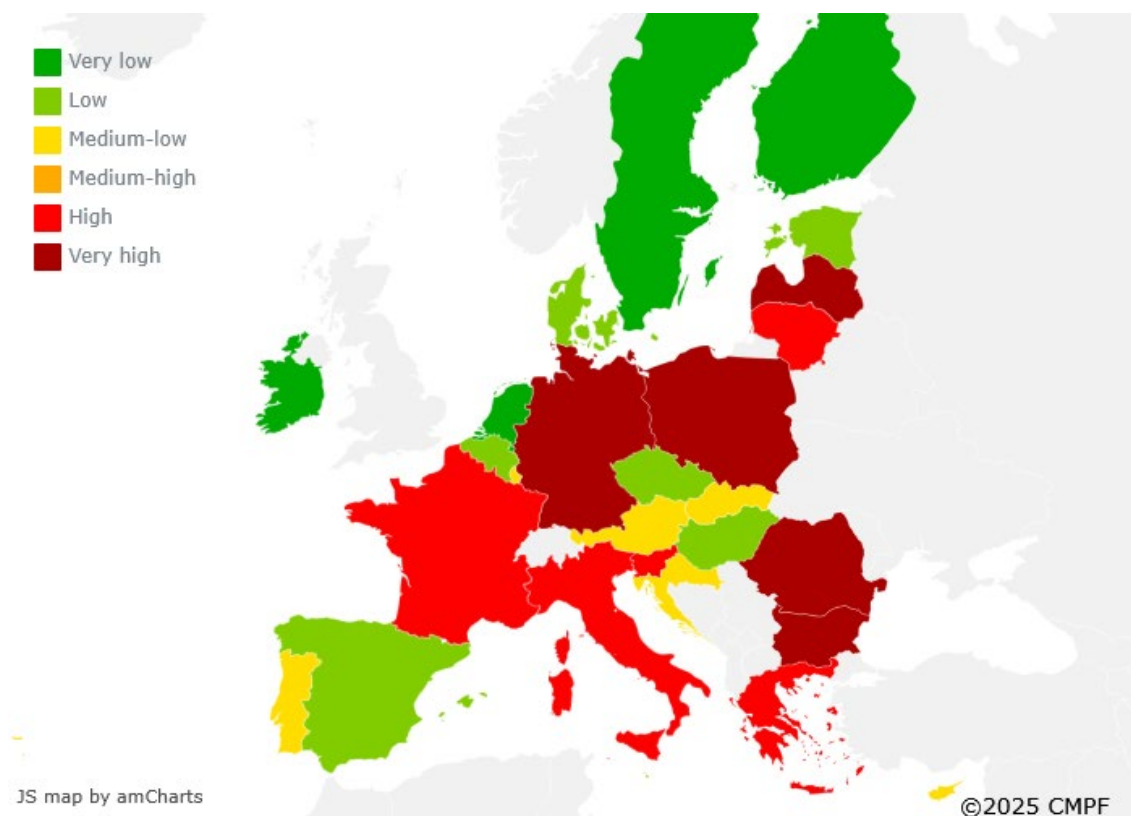
Media literacy is a fundamental prerequisite of an accessible media system and is a core element of media pluralism. The indicator on media literacy is assessed according to how media literacy is represented in and out of the compulsory educational system in a lifelong perspective, as well as by the level of media literacy of the national population.

The *Media literacy* indicator shows important differences across EU Member States. While the average risk level is assessed at medium-low risk, the median falls within the

medium-high-risk band. Such a discrepancy is justified by the excellent performance of five countries - among them, the Scandinavian countries, the Netherlands and Estonia - which score within the very low risk band, which is counterbalanced by the fact that all the other countries are at best in the medium-low risk range. These very low risk scoring countries tend to combine very strong and up-to-date media literacy policies, which are translated into a solid and up-to-date media literacy teaching within the mandatory school curriculum, as well as collaboration with civil society to provide further media literacy activities. This is corroborated by the high media literacy skills within the population in these countries.

In terms of media literacy skills, the poor performance of Germany needs to be highlighted, 'with 19,84% of individuals in Germany having checked the truthfulness of the information or content they found on the internet news sites or social media over the past 3 months in Germany' (Eurostat 2023 - cited in Kalbhenn, 2025), and '53,5% of individuals having above basic information and data literacy skills' (Eurostat 2023 - cited in Kalbhenn, 2025). Such low standards of media literacy are comparable with Bulgaria, Poland, Latvia and Romania. While media literacy is present in the mandatory school curriculum and in lifelong activities in Germany, the extent of media literacy activities varies from one region to another as media literacy policies are a regional prerogative, and in some cases media literacy is a marginal element of the mandatory curriculum. Kalbhenn (2025) also reported 'significant differences between the various types of schools: on average, grammar school students perform much better than students from other types of schools' as well as the strong impact of social background factors on media literacy levels.

Fig 5.b Media literacy skills – Map of risks for country



The situation is also worrisome, among others, in France and Italy for example. France is an interesting case, with strong media literacy policy but limited results. As mentioned by Ouakrat et Bienvenu (2025), Media and information literacy has been integrated in the mandatory curricula since the mid-2000s, and has been regularly updated since then. In 2022, the scope of Media and Information literacy was expanded to include hate speech, cyberbullying, and radicalization. Besides, various stakeholders, including CLEMI, but also media organizations and NGOs contribute through training, providing resources, and initiatives. However, these initiatives does not seem to be enough as the level of Media literacy skills remains limited. While 67.08% of the population has above-basic data literacy skills, only 25.42% verify online information, indicating a need for stronger efforts in media education, especially to fight disinformation.

5.2. Three Focuses on Social Inclusiveness

5.2.1. Focus on Broadband Infrastructures: Measuring the Homogeneity of Broadband Access across Regions in the European Union

In the Decision establishing the Digital Decade Policy Programme, the EU has pledged that its policies, investment and digital infrastructures ‘should aim to ensure connectivity accessible to all and everywhere in the Union, with available internet access, in order to close the digital divide¹ across the Union, with a particular focus on the divide between different geographical areas.’ (Decision (EU) 2022/2481) and one of the targets for 2030 is that all users have access to gigabit networks of high-speed quality (European Commission, 2022).

Within the indicator of *Universal and inclusive access to media*, there are two sub-indicators on *fixed* and *mobile broadband access*. These sub-indicators are assessed as being in the medium-low-risk band for the EU-27. *Fixed broadband access*, in one aspect, looks into the percentage of population with internet access (Eurostat, 2024a) and *mobile broadband access* checks the percentage of population with mobile subscriptions (DESI, 2024), and in doing so, enquires about the situation of both general access to both mobile and fixed broadband in a population of a country. According to the latest Statista data (2024), in Europe, the annual level of internet access among cities, towns and suburbs and rural area households has improved throughout the years. However, based on the performance results among countries within this research, there are still challenges regarding access to fixed and mobile broadband in some countries. For example, in Slovakia, ‘internet access and broadband mobile subscriptions remain below the EU average, limiting digital inclusion’ (Urbániková, 2025, p. 10.). In Greece,

1 ‘The term “digital divide” refers to the gap between individuals, households, businesses and geographic areas at different socio-economic levels with regard to their opportunities to access information and communication technologies (ICTs).’ (OECD, 2001)

high prices and a lack of competition mean that many citizens are unable to afford mobile subscriptions (Papadopoulou & Angelou, 2025).

The above-mentioned sub-indicators have also looked into another broadband aspect. Namely, in the context of the digital divide and its effects, research points out that rural areas still have issues with both access and the quality of broadband (Macdonald, 2024; Gjergji, 2022; Perpiña Castillo et al, 2021). This means that some areas (regions) have better download speed performance than others. Therefore, another very important point concerns the situation with the download speed of both fixed and mobile broadband across different regions within a country. Taking this into account, the Media Pluralism Monitor has developed the '*homogeneity coefficient*', designed to measure the variability of download speeds across regions within the country. It also assesses this performance in comparison to other countries included in the research. The assessment comprises 25 EU countries² and four candidate countries (Albania, Serbia, the Republic of North Macedonia and Turkey), but herein, we only report the results for EU Member States.

To this end, the following formula has been created to calculate the variability of download speed across regions, referred to as the homogeneity coefficient: **Homogeneity Coefficient = Average Speed / Standard Deviation**. The higher the homogeneity coefficient, the better the performance and the lower the variability across regions. The analysis was based on data from Ookla³, with the regions investigated corresponding to NUTS3⁴ regions, as defined by Eurostat, (2013).

What is particularly evident is that the fixed broadband download speed coefficient is low for six countries suggesting greater cross-regional variability (Greece, Croatia, Latvia, Bulgaria, Austria and the Czech Republic). In Latvia for example, there is not enough public funding for the country's infrastructure, and private entities are not that interested in developing infrastructure due to economic factors (Rožukalne & Skulte, 2025). Another interesting case is Malta, a small country with only two NUTS3 regions, with a coverage of 100% of basic 5G (European Commission, 2024a) demonstrating a robust performance as regards fixed broadband download speed, however, the mobile broadband speed coefficient suggests greater variability and high risk.

Of the 25 EU countries analysed, 40% are scoring in the high-risk band when it comes to the mobile broadband download speed variability (Croatia, Malta, Ireland, Spain, Poland, Germany, Romania, Belgium, Portugal and Hungary). In addition, while, for example, fixed broadband download speed variability in Ireland performs better than mobile broad-

² Cyprus and Luxembourg are excluded from the analysis, as each has only one NUTS3 region, making it impossible to apply the formula to these countries.

³ Speedtest by Ookla Global Fixed and Mobile Network Performance Maps was accessed on 13 January 2025 from <https://registry.opendata.aws/speedtest-global-performance>. Speedtest® by Ookla® Global Fixed and Mobile Network Performance Maps. Based on analysis by Ookla of Speedtest Intelligence® data for 1 January- 31 December 2024. Provided by Ookla and accessed 13 January 2025. Ookla trademarks used under license and reprinted with permission.

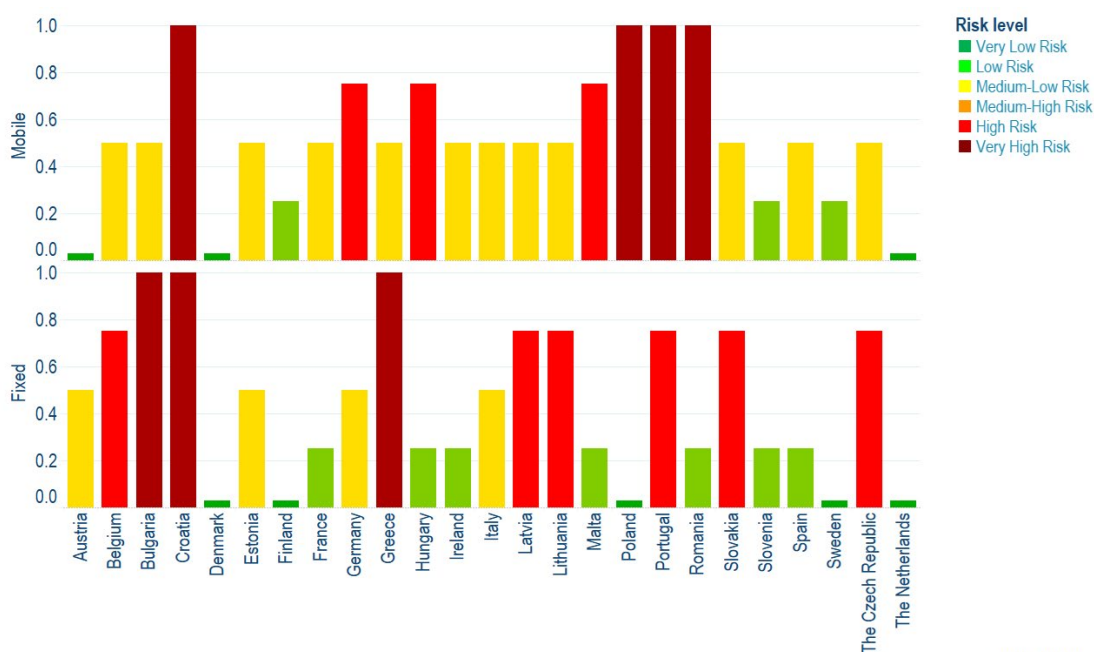
⁴ NUTS-Nomenclature of territorial units for statistics

band, there are still certain challenges as ‘in less densely populated rural areas (especially on the western seaboard), the state-funded National Broadband Infrastructure is not yet complete so broadband speeds vary across the state.’ (Flynn, p. 33, 2025).

The best performance for both the fixed-broadband and the mobile-broadband download speed coefficient was registered for the Netherlands and Denmark, indicating that download speeds are strong and consistent across the regions in both of these countries. This is not surprising considering that significantly higher-income countries broadly perform better in this regard (Macdonald, 2024). The Netherlands actually has the best homogeneity score coefficients for both mobile and fixed download speed, aligning with the State of the Digital Decade Report, which states that all households in this country are covered by at least one mobile 5G network as well as other broadband infrastructures (VHCN, FTTP) (European Commission, 2024b). Furthermore, in Denmark, in order to solve ‘societal challenges through digital means, Denmark presented a national roadmap that demonstrates plans to strengthen the competitiveness of enterprises, improve public services and advance the green transition.’ (European Commission, p.2, 2024c).

By contrast, although ranking high in terms of GDP (Eurostat, 2024b), the performance of mobile download speed variability in Germany and Belgium is assessed as high risk in both countries, and even the fixed mobile coefficient risk score is unsatisfactory (medium risk). Germany has already been reminded by the European Commission of the need to speed up its connectivity efforts (Talayero, 2024) as its download speeds are below the EU average (European Commission, 2024d). Another interesting example is that of Poland where there is a substantial difference in the mobile and fixed download speed homogeneity coefficient, suggesting very little variability for fixed broadband and considerable variability for mobile broadband download speeds.

Fig 5.c -Risk assessment of fixed and mobile broadband sub-indicators which include both access and variability across regions in 25 EU Member States



To conclude, by looking at the overall situation with both access and quality in terms of download speed, the worst results for the fixed broadband sub-indicator are in Greece, Croatia and Bulgaria. Croatia performs badly in terms of access and shows disparities in both fixed and mobile broadband speeds (Bilić, 2024). On the other hand, the Netherlands and Denmark excel across both sub-indicators.

More detailed research is required to find reasons and solutions for variabilities across regions (homogeneity coefficient) and to cross-reference these findings with other considerations such as the proliferation of news deserts, that is, areas where it is difficult or impossible to get reliable and diverse information from independent local, regional and community media (Verza et al, 2024). Good quality access to broadband infrastructure is a necessary prerequisite for people to access the information as well as for the media to perform their work of informing the public at all levels (local, regional, national as well as urban/rural).

5.2.2. Focus on Media Accessibility: The State of Play of Media Accessibility in the Media before the EU Accessibility Act

Since the adoption of the Audiovisual Media Services Directive (Art. 7) (AVMSD), 'Member States shall encourage media service providers to develop accessibility action plans in respect of continuously and progressively making their services more accessible to persons with disabilities. Any such action plan shall be communicated to national regulatory authorities or bodies'. However, a longitudinal observation of the MPM data since 2021 shows no significant improvement to media accessibility, and even a certain increase of the risk level (See Figure 1). Media Accessibility for people with disabilities in the EU Member States remains associated with a medium-low risk, on average. This risk reflects very different situations among Member States (See Figure 2). While Scandinavian countries and Western European countries tend to perform relatively well, data show it as still a difficult problem in most Eastern European countries and in Southern countries such as Italy and Greece.

Fig. 5.d EU-27 aggregate risk scores for media accessibility for people with disabilities

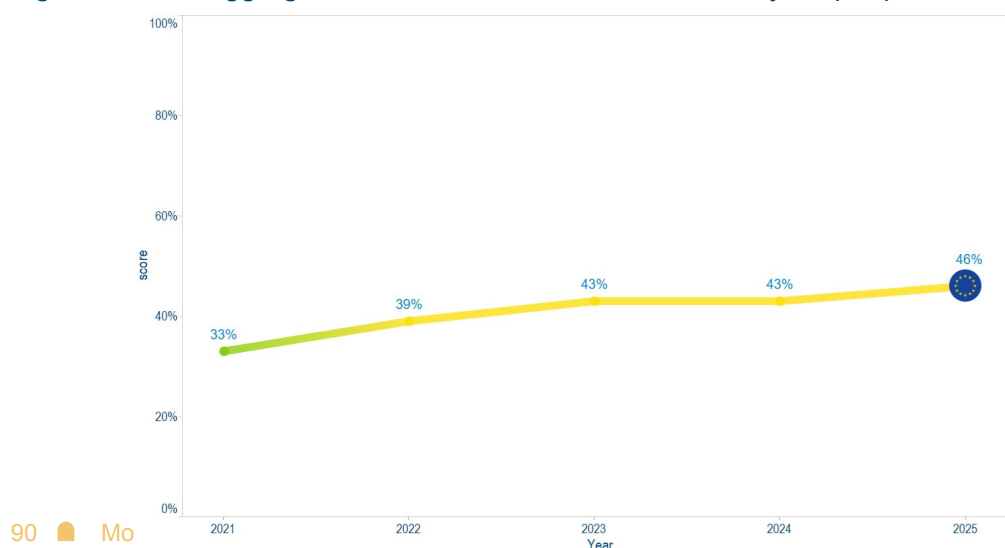
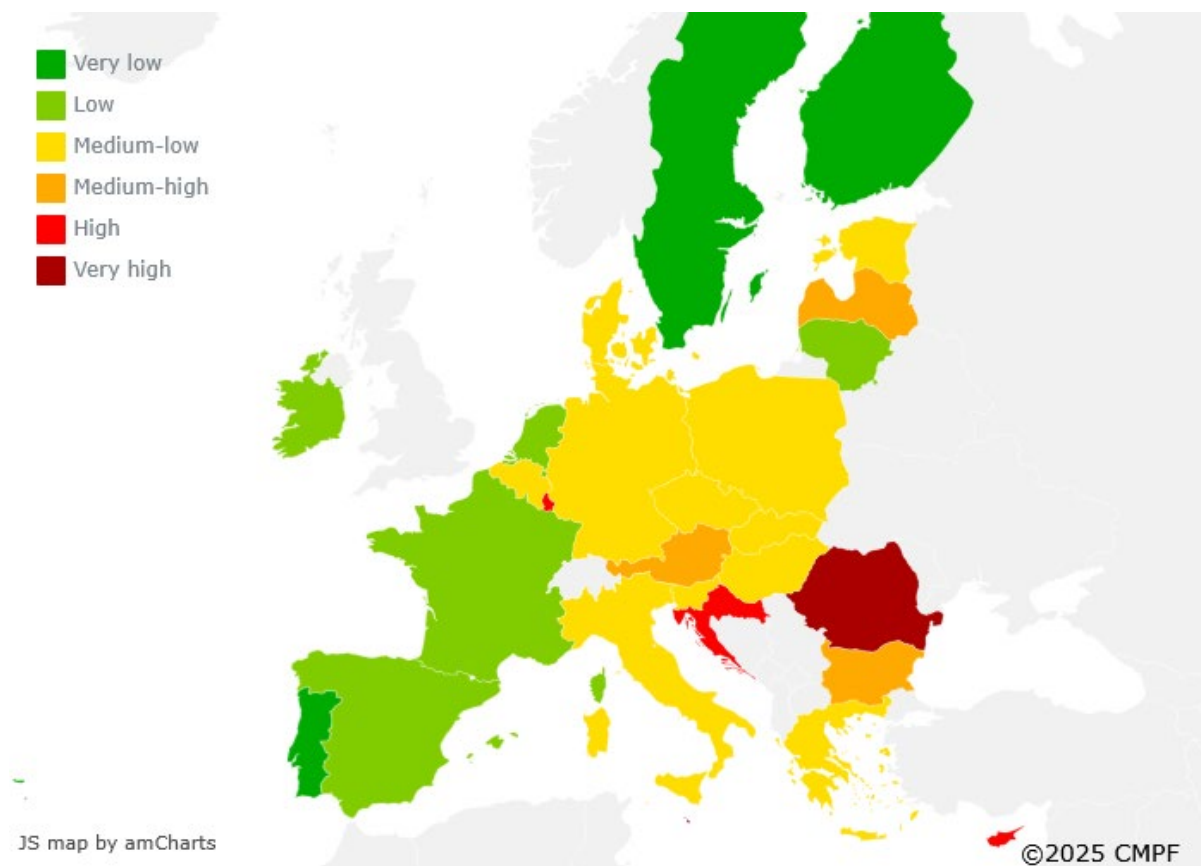


Fig 5.e Media accessibility for people with disabilities - map of risks per country.



While all the EU Member States have generally adopted a legal framework to ensure media accessibility for people with disabilities, in line with the audiovisual media service directive, the concrete legal obligations imposed on audiovisual media services providers vary greatly from one country to another. A comparative analysis of the national legal frameworks shows that the best performing countries impose very high quantified objectives on audiovisual media service providers, in terms of support for people with hearing or visual impairment, including subtitles, sign language and audio-descriptions. These quantified targets also tend to be associated with significant sanctions if the providers do not meet the requirements. On the contrary, in poor performing countries, the existing legal frameworks tend to focus more generically on the efforts that audiovisual media service providers should be making, without fixing quantified objectives or imposing minimal standards of support.

Among the best performing countries, Finland sets very high subtitling and audio-description requirements for public service television broadcasts and television programming (Ylikoski & Ala-Fossi, 2025). For public service media (PSM) channels, 100% of programming must have subtitles and audio descriptions. For other broadcasters, the requirement is set at 75%. The legal framework was amended at the beginning of 2021,

to include requirements for video-on-demand services (30%), except for live-music and live-sports. Non-compliance with the accessibility requirements can lead to a company's broadcasting or operating licences being revoked. Given the severity of the penalty, audiovisual media providers strictly comply with the requirements.

In France, PSM channels are bound to provide the entirety of their programmes with enhanced accessibility for disabled people. Private channels with more than 2,5% of audience share such as TF1, Canal+ or M6, also have to subtitle 100% of their programs (except for a few derogations, such as advertisements). Non-compliance with these obligations triggers fines. Such strong obligations have proven efficient (Ouakrat & Bienvenu, 2025) and 100% of the programs broadcast by France Television are subtitled.

In the Netherlands, the legal framework has been progressively adapted, leading to the necessity for all service providers (which includes, among others, streaming services) to be fully accessible by July 2025, in line with the European Accessibility Act (Schuck et al., 2025). Since 2022, online media and influencers have had to follow the rules imposed on traditional media in terms of accessibility. In order to reach these goals and after an initial focus on subtitles, the government has provided extra resources for audio-description and to provide increased accessibility support for programs of high societal or cultural value (for example, . election debates, or Sinterklaas). Strong and clear legal frameworks tend to favour innovations. For example, the Dutch public broadcaster NPO has developed the use of AI to create vodcasts (video podcasts) for children with hearing impairments (Schuck et al., 2025)

Countries associated with either a medium-low or a medium-high risk have often made visible efforts to foster media accessibility following the adoption of the AVSM directive in 2018. However, their legal framework or their application often remains problematic. For example, in Poland, the 1992 Broadcasting Act was amended in 2018 to increase the quota from 10% to 50% of transmission time with appropriate aids such as audio-description, subtitles for the hearing impaired and interpretations into sign language (Klimkiewicz, 2025). Even if the objectives are not yet fully fulfilled, some progress has been observed in recent years.

More recently, Slovakia's new Media Services Act, which was adopted in 2022, obliges public service broadcaster to ensure that all television programme services are accompanied by subtitles for persons with hearing impairments, or otherwise are interpreted into or developed in Slovak sign language, and that at least 50% of all programmes are accompanied by voice commentary for people with visual impairments; and commercial broadcasters shall ensure that 25% of all their programmes have subtitles for persons with hearing impairments or are interpreted into or developed in Slovak sign language, and that 10% of all programmes are accompanied by a voice-over for people with visual impairments. However, in the absence of compliance mechanisms, these new legal obli-

gations have not yet been followed by a change in practice as there is very little general awareness or willingness on the part of public authorities to do so, nor is there much initiative on the part of producers and broadcasters (Urbániková, 2025).

Among the worst performing countries are Romania, Croatia, Luxembourg, Cyprus and Malta. In these countries, requirements in terms of accessibility support for people with disabilities are very limited or inexistent. For example, in Romania, the audiovisual law only imposes broadcasters to provide minimum accessibility support for people with disabilities, that is full interpretation in sign language or at least a written summary for programmes of national importance, and at least 30 minutes of programming on news, analysis and debate on political and/or economic themes related to current events per day with a sign language interpreter. In addition, there are no regulatory requirements that cater to persons with sight deficiencies (Toma et al., 2025). For Malta and Luxembourg, existing legislation does not impose any quantitative requirement.

Based on these observations, it appears that audiovisual media service providers tend to comply only with existing media accessibility legislations when there are mandatory quantified objectives and when there are strong control mechanisms in place. Among these control mechanisms, the self-generated reports on media accessibility performance made by audiovisual media service providers in Ireland is cross-checked by the Coimisiún na Meán which conducts a randomly selected weekly monitor sample (Flynn, 2025). Besides, the Coimisiún na Meán also maintains two User Consultative Panels representing users with hearing and sight difficulties. These panels offer feedback on user experiences of access services, and these are fed back to the broadcasters by Coimisiún na Meán.

Finally, even in countries with a strong legal framework in terms of media accessibility, a considerable gap exists between support available for people with hearing impairments (including subtitles and sign language interpretation) and support available for people with visual impairments, that is audio-descriptions (see figure 3). Support for people that are visually impaired appears limited in most countries, except in Sweden. The Scandinavian country is associated with a very low risk in terms of support provided to people with visual impairments, thanks to the Read Text service available on several channels (SVT1, SVT2, The Knowledge Channel and SVT Barn / SVT24 for those who watch TV via the digital terrestrial network (not HD TV)). The service provides support for people who have difficulty reading the text strip (Färdigh, 2025).

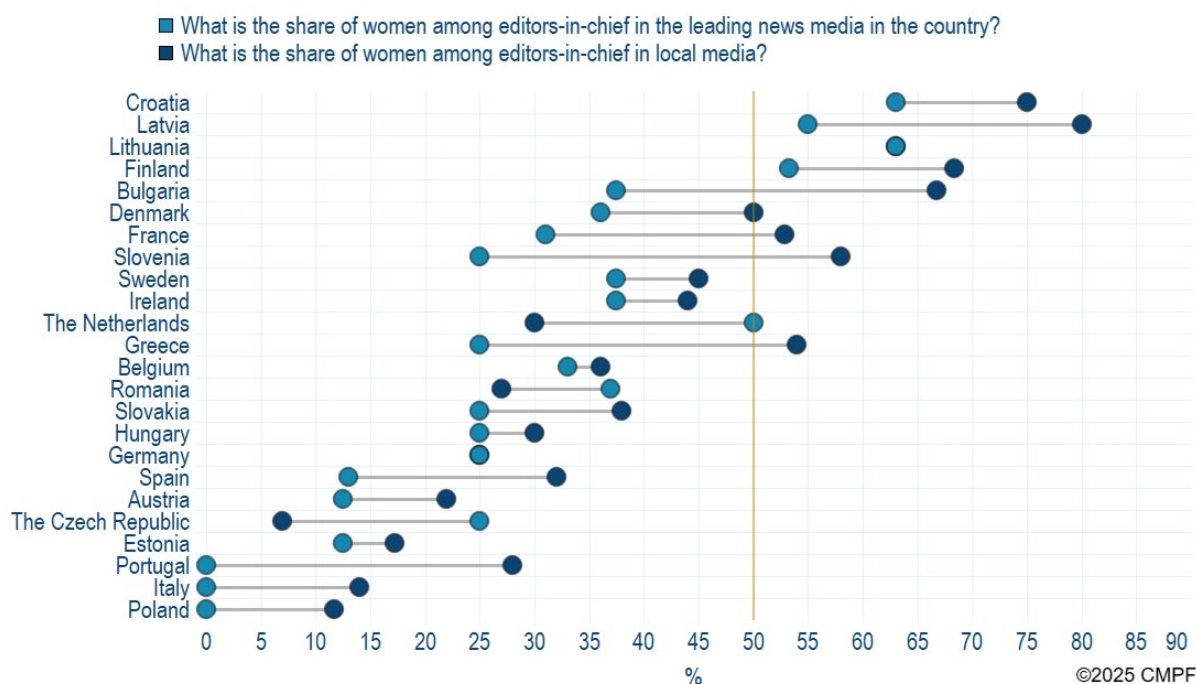
5.2.3. Focus on gender equality: Women Editors-in-Chief and Local Media

The year 2025 marks the 30th anniversary of The Beijing Declaration and Platform for Action (UNWOMEN, 1995) which promoted two main goals regarding women and the media: i) increased participation and access of women to expression and decision making in and through the media, and ii) the promotion of a balanced and non-stereotyped portrayal of women in the media. Despite the declaration, a longitudinal study based on the MPM has demonstrated that these goals tend not to be fulfilled in most of EU Member States (Palmer & Urbániková, 2025). However, for these results, the MPM focused mostly on top national media companies, as does most academic literature (e.g. Ross Arguedas et al., 2025, 2024; Urbániková, & Čaladi, 2024), and as such, the question of gender parity in media management and in media content within local media outlets has been mostly overlooked.

The latest research in 27 EU countries has shown that the presence of media outlets addressing certain less prominent groups (such as women) is small and that there is a considerable lack of specific data on this very important topic (Verza et al., 2024). This is worrisome as local media are a key element of our democracies due to their closer relationship with the public in comparison to national media (Council of Europe, 2023). Indeed, local media enhances the sense of community and provides essential news to the public (e.g. Blagojev & Kermer, 2025, Stearns, 2022; Gulyas & Baines, 2020).

Taking this into consideration, for the MPM2025, a variable was added to the MPM questionnaire focusing on the proportion of women among editors-in-chief in local media outlets. To assess whether the representation of women and men among editors-in-chief of local media companies was balanced, local research teams had to create a sample composed of one media outlet per region, including a balanced mix of audiovisual, radio, newspapers, and digital natives. Then, the local country teams had to calculate the share of women among editors-in-chief in the selected media outlets and divide this number by the total number of editors-in-chief. The result obtained for local media companies was compared to the total numbers of editors-in-chief for the main eight national media companies, based on readership and/or impact- including two audiovisual media outlets, two radio, two newspapers, and two digital-only news outlets.

Figure 5.f - Comparison between the share of women among editors-in-chief in leading news media and in local media.



This first data collection regarding women editors-in-chief for local media outlets showed that despite significant variations between countries, there are significantly more women editors-in-chief within local media outlets than within main national media outlets. The average proportion of women editors-in-chief reaches 29.2% in national media companies, against 39.9% in local media outlets. Only three countries have more women as editors-in-chief of main media: the Netherlands, Romania and the Czech Republic, the latter having the lowest proportion of women among editors-in-chief of local media outlets (7%).

While the representation of women among local media editors-in-chief seems better among main media editors-in-chief, only nine EU Member States have reached gender parity among editors-in-chief for local media: Latvia, Croatia, Finland, Bulgaria, Lithuania, Slovenia, Greece, France, and Denmark. Among these, the share of women among editors in chief in local media outlets reached more than 60% in Lithuania (63%), Bulgaria (66,7%), Finland (68.4%), Croatia (75%), and Latvia (80%). On the contrary, only five countries reached parity regarding the number of women editors-in-chief for main media: Croatia, Lithuania, Latvia, Finland, and the Netherlands. Parity has been reached among editors-in-chief both in main media and in local media in only four countries: Croatia, Lithuania, Finland and Latvia.

It is interesting to note the poor performances of the Czech Republic, Poland, Italy, Estonia Austria, and Germany. All these countries count less than 25% of women editors-in-chiefs in local media. Italy, where only 14% of local media editors-in-chiefs and 0% of main media editors-in-chief are women, is almost as bad as Poland (11.7% and 0% respectively). In Italy, despite an ongoing debate regarding the underrepresentation of women across society, out of the 35 top editorial positions there are only two female editors-in-chief in the country: one for national media, Agnese Pini, who oversees the newspapers published under the *Quotidiano Nazionale* banner by the Monrif Group (*La Nazione*, *Il Giorno*, *Il Resto del Carlino*), and one for local media, Nunzia Vallini, editor-in-chief of the *Giornale di Brescia* (Vigevani et al., 2025). Although Estonia performs better than Italy and Poland, it is interesting to note the contrast in its relatively low share of women editors-in-chief (12.5% in main media outlets and 17.2% in local media outlets) compared to the other Baltic countries. According to Estonian gender expert Barbie Pilvre (cited in Palmer & Zuffová, 2024, p. 34), 'gender equality is not perceived as relevant, especially for generations over 30. (...) This absence of interest can be explained by the Soviet heritage. In the Soviet era, women were part of the workforce, to the same extent as men, and are well-represented among journalists. This gave a kind of illusion of gender equality and prevented the rise of a strong feminist movement'.

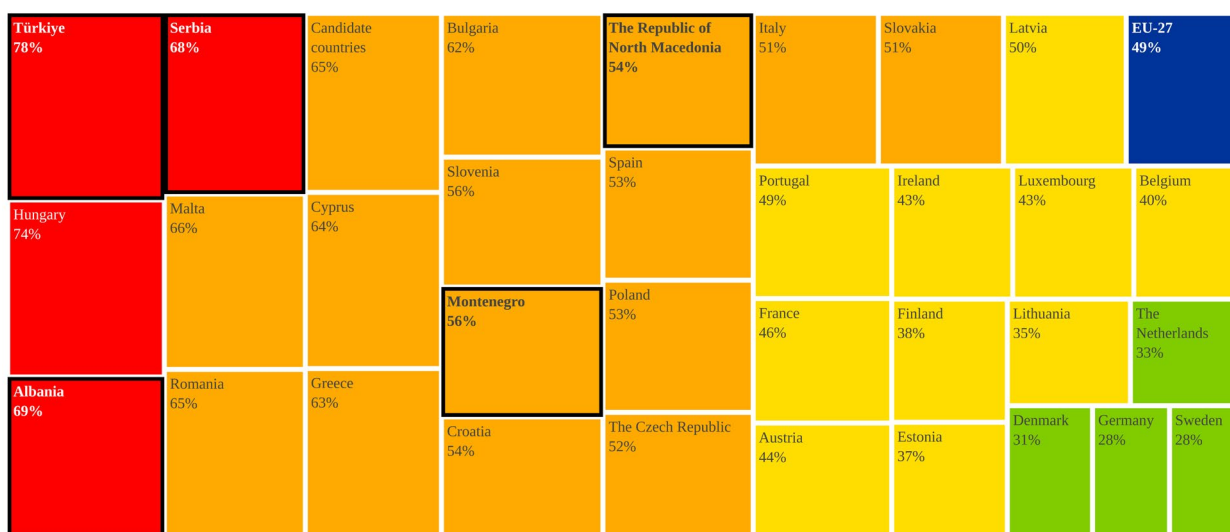
Spain performs better than the previous group of countries, yet parity is far from achieved with 13% of women editors-in-chief at the national level and 32% at the local level, despite a well-developed legal framework in terms of gender equality (Suau Martinez et al., 2025). While the 1978 Spanish Constitution proclaims the equality of women and men, the Organic Law 3/2007 of 22 March, for the effective equality of women and men, aims to implement this proclamation by outlining measures of positive action aimed at eliminating structural and persistent inequalities, including in the field of media. For example, the law obliges media companies to avoid any form of gender discrimination, to respect gender equality, and to promote knowledge and dissemination of the principle of equality. In terms of content, it forbids the diffusion of stereotypical content and in terms of media management, companies must guarantee gender balance and equal treatment in all professional positions. However, imbalances remain in practice, and improvements have slowed in recent years, with women's rights being seriously threatened by the rise of the far-right.

In countries where gender parity in terms of editors-in-chief both at the national and local level is achieved, this does not automatically guarantee quantitative nor qualitative gender balance in news media content. For example, while Lithuania has reached parity in terms of editors-in-chief both at the national and at the local level, women experts tend to remain underrepresented in Lithuanian media, where the figure stands at 30,3% (Jastramskis, 2025). This echoes the situation in Latvia, with existing research showing that women make-up only one-third of experts participating in discussion programmes

(Rožukalne & Sprudzāne, 2024 cited in Rožukalne & Skulte, 2025). In Croatia, the latest conclusions of the daily monitoring conducted by the Ombudsperson for Gender Equality highlighted qualitative issues with ongoing gender biases in media content. Sexism, gender-based violence, sensationalism, and stereotypical portrayals of women remain persistent issues in Croatian media, especially in political commentary and expert analysis (Bilic, 2025). Such findings are in line with Palmer & Urbániková (2025), who highlighted the absence of correlation between the increasing number of women in management positions in broadcasting media and more gender-balanced content. Nevertheless, the equal representation of women as editors-in-chief both at local and national level is essential to progress towards a more inclusive society, local being an often overlooked yet indispensable scale of change.

CHAPTER 6. Media Pluralism in EU Candidate Countries - Albania, Montenegro, Serbia, the Republic of North Macedonia and Türkiye

Figure 6.a. Overall assessment - General tree-map ranking including candidate countries



This chapter analyses the risks to media pluralism in the following EU candidate countries: Albania, Montenegro, Serbia, the Republic of North Macedonia and Türkiye. Montenegro and Albania are currently at the forefront in terms of projections for progressing in the EU accession process (European Western Balkans, 2025; Central European Times, 2025). Serbia, on the contrary, faces a limited political engagement to address the necessary requirements needed to move the negotiation process forward (lack of concrete reforms, political and social crisis, as well as its political ties with Russia) (Picula, 2025; RTS, 2025). In the meantime, Türkiye's candidate status is frozen due to the democratic deterioration in the country (European Parliament, 2025). After many

years of waiting, the EU accession talks with the Republic of North Macedonia opened in 2022 (European Commission, 2024). However, after the 2024 elections, the conservative party VMRO-DPMNE (which in the past has been very critical on the compromise plan made for EU accession (Stamouli, 2022)) returned to power. Their election may impact how the process of accession will look in the future due to the already strained relations with one of the Member States, Bulgaria. (Nikolov, 2025).

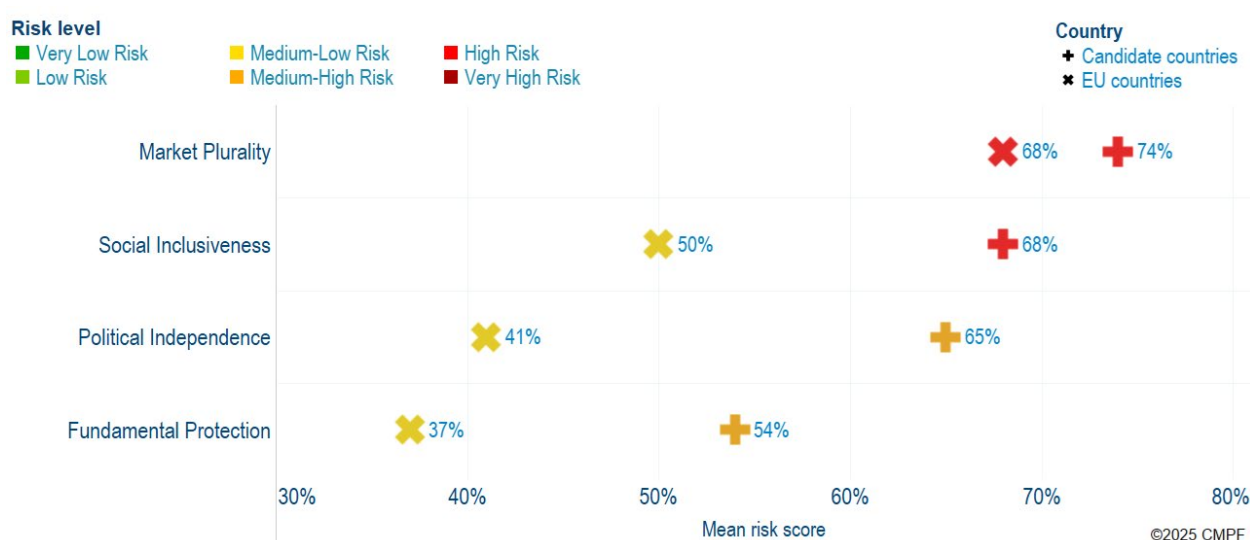
Against this backdrop, the Media Pluralism Monitor results show that media pluralism tends to be significantly more at risk in all the candidate countries studied with respect to the EU-27 average. Türkiye, Serbia and Albania are associated with a high risk, while Montenegro and the Republic of North Macedonia were assessed as presenting a medium-high risk in 2024. The reason for the better performance of these two countries is, in the case of Montenegro, related to the adoption of a set of new media laws as part of the EU *acquis* alignment that have the goal of improving the independence of media and the competencies of the media regulator. These include the new Media Law (54/24), the new Law on Audiovisual Media Services (54/24), and the new Law on Public Broadcaster RTCG(60/24)) (Brkić Ružić, 2025). Brkić Ružić also points out that the effects of these adoptions are still to be assessed in 2025 and some of the old issues persist, such as improving regulation related to free access to information, data protection, and the area of online media.

In the Republic of North Macedonia, the existing legal framework leads to solid levels of respect for fundamental rights, and the government is taking steps to make changes in order to regulate digital media service providers as well as to elect the Council members of the AVMU (media regulator), which has not been done for five years. However, concerns remain due to the change of political actors in power after the elections and future implementation practices. One of the major concerns is the previous government's removal of Article 102 from the Law on Audiovisual Media Services, which banned state advertising in all audiovisual media. This situation could lead to increased political influence over the media, as the ban was initially imposed to stop the discriminatory practices of state advertising allocation. In the past it was allocated to the most influential media, it distorted the media market and led to biased coverage (Micevski & Trpevska, 2025).

Türkiye is the worst performing country among all those examined in the MPM2025 and presents serious challenges for media freedom. The concerning high risk to media pluralism in Türkiye is evident in all areas covered by the MPM. The current legal framework is used to penalise media outlets working for the public interest through, for example, the removal and blocking of websites without oversight of the judiciary, the criminalisation of disinformation (which is used as a tool to target independent media and endanger the protection of sources). In addition, Türkiye has the highest number of fines imposed by national regulatory authorities (Inçeoğlu et al, 2025).

Even though accession negotiations were opened in October 2024 for Albania, it has been pointed out that journalists' working conditions are unsatisfactory in the country, self-censorship is high, and critical media are exposed to smear campaigns and intimidation (Likmeta & Voko, 2025). A similar negative situation is observed in Serbia, which has very high levels of political influence over the media sphere in all areas covered by the MPM. Legislation changes from 2023 only partially aligned with the EU acquis and, as in other candidate countries, the implementation of this legislation is creating serious issues (Milutinović, 2025). Milutinović further states that there has been an increase of physical and verbal attacks against journalists. Furthermore, the controversial process of election of Council members of the Regulatory Body for Electronic Media (media authority) has still not been completed, thus leaving the Serbian media sphere without adequate oversight. This is evident in the rise of disinformation and hate speech against the critical voices, particularly during the ongoing mass student protests.¹

Figure 6.b. Risk per area candidate countries vs. EU Member States

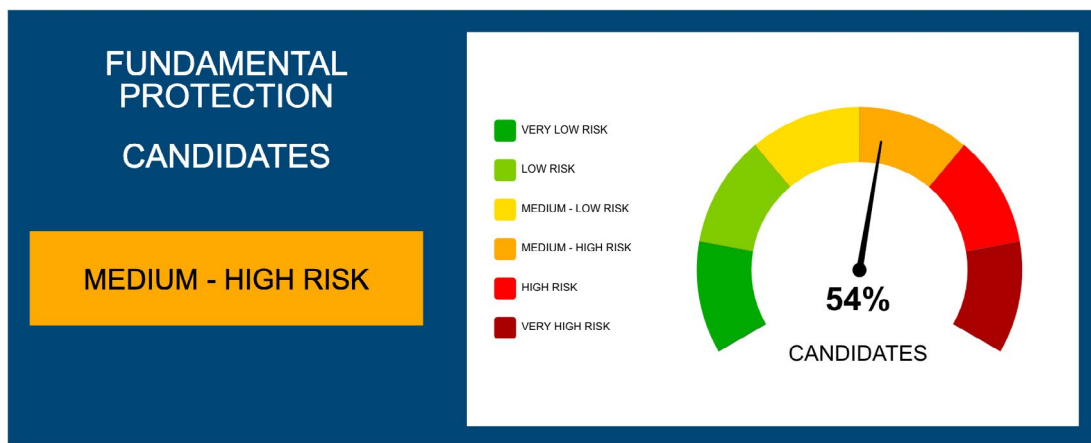


For the EU-27 countries, the score per area shows that the most difficult situation, with the highest risk score, is **Market Plurality**. Other areas score in the medium-low-risk band. The situation in the candidate countries is worse in all areas. Only in **Market Plu-**

¹ Mass student protests in Serbia continue for more than half a year now, sparked by the fall of the canopy in Novi Sad railway station on 1 November 2024 when 16 people were killed and one severely injured (Nordby, 2025). The demands have still not been fulfilled by the government even though the pressure led to the resignation of Prime Minister Vučević and the subsequent reshuffling of the government. Throughout this period, there have been multiple cases of disinformation and hate speech, as noted by Tonino Picula's reports and the subsequent European Parliament Resolution: 'European Parliament rejects allegations that the EU and some of its Member States were involved in organising the student protests with a view to triggering a 'colour revolution'; strongly condemns, in that context, the unlawful arrests and expulsions of EU citizens and the public disclosure, by convicted war criminals, of the personal data of EU citizens, as well as hate speech against national minorities; expresses concern about the rising number of detention cases involving EU citizens at Serbia's border; notes that anti-EU narratives are being manifested in decreasing support for EU integration in Serbian society and in a strengthening of the presence of foreign autocratic actors in the country.' (Picula, 2025)

ality the average score in this area for candidate countries falls within the same high-risk band, as does the average score for EU Member States—although with a higher percentage risk score. Based on reports by local researchers and their results, the media systems in all candidate countries show that there are various challenges. Challenges in the area of **Fundamental Protection** exist in terms of protection of information integrity online, especially problematic working conditions for journalists (salary, physical and digital harassment) and the pervasive presence of SLAPPs paired with the lack of specific anti-SLAPP legislation. In the **Market Plurality** area, the highest risk comes from the indicator that measures the concentration of the markets for the digital intermediaries (scoring the highest among all the indicators in the candidate countries). For the **Political Independence** area, media outlets show high levels of political influence and control, based on a concerning interrelation of factors, such as direct and indirect political ownership, the lack of effective internal and external self-regulatory safeguards, the biased distribution of state resources, and the political influence over PSM. And finally in the area of **Social Inclusiveness**, local, regional and community media are especially negatively affected by economic and political pressures, minority and marginalised groups have difficulties with media access, hate speech is widely spread, and media literacy is burdened with challenges and a lack of any strategic approach. The lowest risk for all the indicators in all areas is related to the independence and effectiveness of national regulatory authorities (medium-low), however even this has shortcomings that should not be neglected.

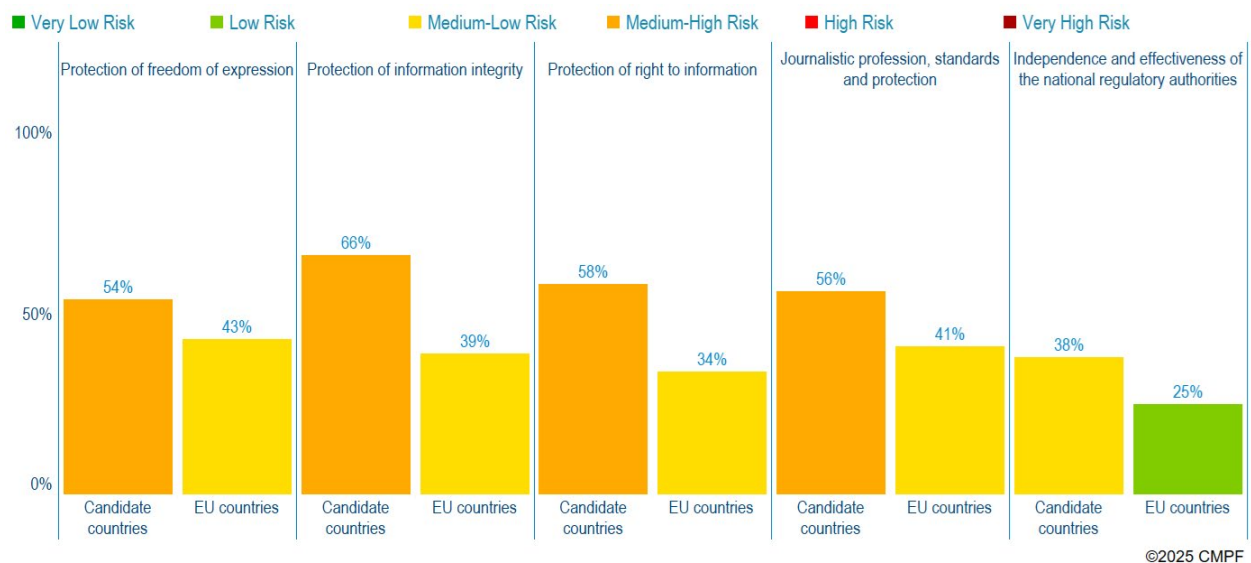
6.1. Fundamental Protection in candidate countries



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The area of **Fundamental Protection** in five candidate countries under analysis scores higher risk than in the EU Member States (scoring medium-high against medium-low). The reason is that in these countries the legal framework usually recognizes fundamental protection principles, however often no proper implementation is often in place. Moreover, the socio-political context makes it more difficult for journalists to freely perform their public interest role.

Figure 6.c. Risk per indicator for Fundamental Protection area for candidate countries vs. EU Member States



Focus on Particular Indicators

The indicator on the *Protection of information integrity* has the highest risk within the area of **Fundamental Protection** (medium-high) and the biggest difference in comparison to average EU country performance. Due to many issues burdening candidate countries, such as strong political leverage in the media sector, it becomes difficult for them to adopt the laws that would properly regulate information integrity without turning them into censorship tools. This is particularly evident in the case of Türkiye where certain laws such as the ‘Disinformation Law’ is used to silence journalists and independent media or the proposed ‘Foreign Agents’ Law that would focus on media outlets and civil society organizations that have international financing, referring to them as ‘agents of influence’ and bringing further concerns regarding the potential penalization of critical media outlets (Inčeoglu et al, 2025).

Furthermore, the status of candidate countries excludes them from the obligations imposed on online platforms under the EU framework, leaving moderation practices even less transparent and accountable. Candidate countries not only often lack platform reporting and, conversely, sufficient and reliable data to assess the risks to freedom of expression, but they also highlight potential misuse of reporting mechanisms, disproportionate sanctions imposed by platforms, and the absence of effective appeal mechanisms. All these countries also use languages that are not normally supported by platform moderators. However, even if candidate countries were to implement EU regulations, apprehensions remain regarding the lack of independent national regulatory authorities, which raises concerns about their potential role as Digital Services Coordinators under the Digital Services Act (Danilovska-Bajdevska et al, 2024).

The indicator on the *Protection of the right to information* also scores medium-high risk for candidate countries, which is a higher-risk band compared to EU-27 countries' average performance (medium-low). All candidate countries report issues with whistleblower protection and access to information. Regarding the protection of whistleblowers, in candidate countries there are diverse reasons why the challenges exist, such as the lack of legislation to protect whistleblowers (e.g., Türkiye). or even when such legislation is present, it is mostly ineffective. Among the reasons of ineffectiveness the MPM researchers list: administrative obstacles or pressures on the judiciary by the authorities in the cases that involve government officials (e.g. Serbia); lack of courage or knowledge (e.g. the Republic of North Macedonia); lack of institutional capacities (e.g. Montenegro); deficiencies in the law that do not allow whistleblowers to publicly disclose information (e.g. Albania). Access to information also proves to be difficult in candidate countries even where there is legislation on free access to information due to the excessive use of appeal mechanisms, to the prolonged silence of the administration, or to denials of access on unclear grounds. This is seriously constraining journalists' attempts to provide timely and relevant information to the public.

Journalistic profession, standards and protection proves to be another source of considerable challenges in candidate countries scoring within the higher-risk band (medium-high). Poor working conditions in combination with physical and verbal attacks and smear campaigns often initiated by the representatives of authorities are creating serious problems for journalists (for example, in Türkiye with the case of Azim Deniz or the cases of other journalists investigating the Sinan Ateş case; the cases of Dinko Gruhonjić and Ana Hegediš Lalić (Council of Europe, 2024), and that of Tamara Skrozza in Serbia). In Türkiye and Albania, women are particularly susceptible to gender-based threats and harassment. Cases of illegal surveillance of journalists have been noted in Montenegro, Serbia and Türkiye, for example, the cases of Gradska TV in Montenegro; Slaviša Milanov in Serbia; and Murat Ağirel in Türkiye (European Centre for Press and Media Freedom, 2024). In Türkiye, 18 journalists are still imprisoned (reported in Inčeoglu et al, 2025).

The indicator on *Protection of freedom of expression* scores medium-high risk and within it the spreading of SLAPPs represents a particularly worrying situation. As already pointed out, not a single candidate country has adopted specific anti-SLAPP legislation, and almost all candidate countries report difficulties in identifying SLAPP cases; moreover, the judiciary is not well-familiarized in dealing with this type of lawsuit. The worst situation has been registered in Türkiye and Serbia. In Serbia, for example, 'the use of SLAPPs, citing anti-inflammatory legislation and its flexible interpretation, is part of a "lawfare" campaign by which government officials, organised crime, and others are weaponizing legislation to silence investigative and critical voices' (cited in Milutinović, 2025). In Montenegro, bureaucratic hurdles and lengthy proceedings are also placing pressure on

defendants (Brkić Ružić, 2025). The Republic of North Macedonia is the only country, among the candidates under analysis, that has not registered notable SLAPP cases in 2024 (Micevski & Trpevska, 2025).

As already mentioned, the indicator on the *Independence and effectiveness of national regulatory authorities* was assessed as having the lowest-risk score in this area of analysis. However, the reason for this assessment is that in some countries the situation with media regulators is in the process of being improved thanks to the newly adopted law in Montenegro (Law on Audiovisual Media Services), or because the procedure for the election of council members of the regulator have begun (e.g. the Republic of North Macedonia). Despite these recent developments, all the candidate countries report political interference in the work of these bodies and the situation is far from good. The sub-indicator on the *Independence of national regulatory authorities* has the highest comparative difference between Member States (low risk) and candidate countries (medium-high risk). For example, in Serbia, one strategy used by the government to disable proper functioning of the media regulator is by not initiating the election procedure for the regulator's council members within the legal deadline after previous members terms end, leaving the country's electronic media without oversight (Milutinović, 2025). In Montenegro, the work of the media regulatory body is generally well assessed; however, the parliament did not issue a public call for the appointment of new council members on time leaving this relevant body with only three out of five members (Brkić Ružić, 2025). In Albania and the Republic of North Macedonia, political interference in appointment procedures is highlighted by researchers. Finally, the most striking situation is found in Türkiye, where RTÜK and BİK use their sanctioning powers to punish and impose fines on critical media outlets. (Inçeoğlu et al, 2025).

Recommendations for candidate countries

To reduce the risks to media pluralism in the **Fundamental Protection** area, the following recommendations are proposed for relevant actors.

States should:

- Ensure smooth, timely and consistent implementation of media legislation that is already in force.
- Ensure the independence and effectiveness of national regulatory authorities and remove political interference through improved procedures of appointment as well as avoiding postponement of council/board member elections. Transparency of the work of the regulators should also be improved.
- Improve the legal conditions for journalists to improve their safety and to give

them legal protection against attacks, threats and smear campaigns. Likewise, states should consistently implement legal safeguards.

- Publicly condemn all cases of threats, attacks or violence against journalists in order to improve their working environment, as well as refrain from initiating attacks on media and journalists in public discourse.
- Adopt anti-SLAPP legislation.
- Improve the system of free access to information by providing clear legal reasons for denial of access, and by preventing the practice in public administration offices of ignoring such requests or of engaging in prolonged appeal mechanisms.
- Align the regulation for whistleblower protection with the new EU acquis.
- Ensure the transparency and participation of all relevant stakeholders in the case of media legislation drafting processes.

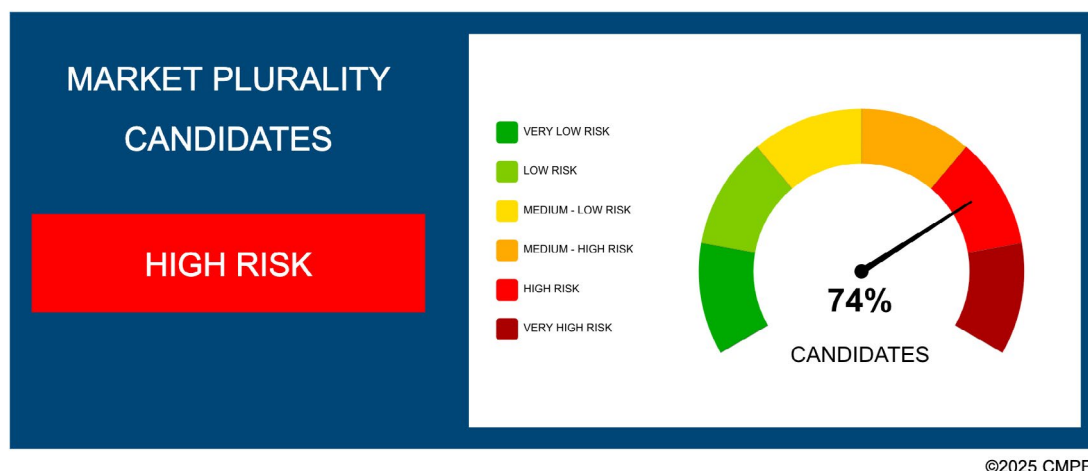
The media community and journalists' associations should:

- Increase actions that aim to improve the working conditions of journalists and decrease labour violations.
- Work on increased solidarity in the media profession in order to assist the media community to counter attacks and smear campaigns, especially those initiated by state officials.
- Where lacking, work on strengthening professional associations and self-regulatory bodies.

Very large online platforms and EU institutions should:

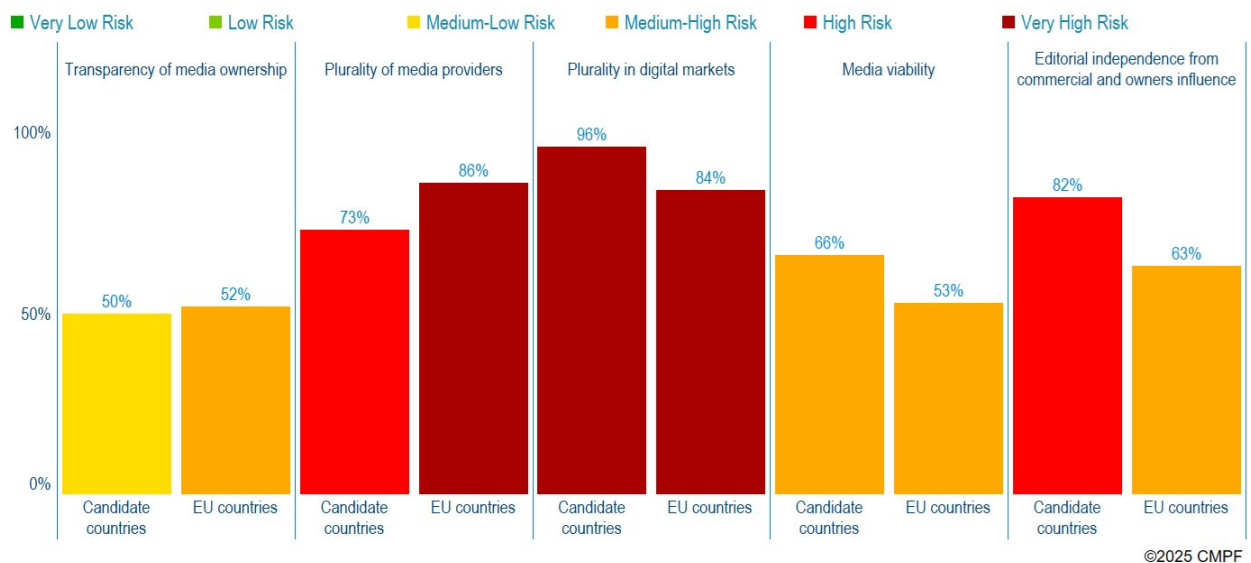
- Extend DSA compliance with regard to candidate countries. It is therefore necessary to initiate in-depth cooperation between social media platforms, governments and civil society organizations from candidate countries in line with the DSA due diligence mechanisms. The European Commission should also be involved in this process.

6.2 Market Plurality in candidate countries



The **Market Plurality** area scores within the same high-risk band for candidate and EU-27 countries. *Plurality of digital markets* is the indicator that is evaluated as the highest risk for candidate countries among all indicators in all areas (very-high risk). The same is true if EU Member States are considered, showing that the issue of concentration of ownership in digital markets and its impact on the media environment is similar. Interestingly, the indicator on *Plurality of media providers* shows a lower risk band for candidate countries (high risk) in comparison to EU-27 (very-high risk), reflecting a lower concentration of media ownership. The reason could lie in the fact that the markets of candidate countries are smaller and less developed, whereas in advanced markets there is a more rapid tendency to concentrate and consolidate. A lack of data on this issue also makes more certain conclusions difficult. Conversely, the media in the candidate countries appears to be more vulnerable to economic pressure. The biggest difference between EU-27 and candidate countries is evident in the indicator on *Editorial independence from commercial and owners influence*, which scored medium-high and high risk respectively. *Media viability* is within the same medium-high risk band as European Union countries, however, with a higher risk score for candidate countries. The long-term economic crisis in the media, which affects both reader revenues and advertising, can be observed in these countries as well. However, the extent of this crisis is at times hard to assess, as there is also a lack of detailed and transparent data (for example in the cases of Türkiye and Serbia). Moreover, innovations in business models and formats tend to be less sustainable than in EU Member States. *Transparency of media ownership* scores the lowest out of all the indicators for candidate countries but still a medium-low risk band. The results in this area show that **Market Plurality** poses a challenge for both types of countries under this research in terms of plurality, editorial independence, transparency of ownership and media viability.

Figure 6.d. Risk per indicator for Market Plurality area for candidate countries vs. EU Member States



Focus on Particular Indicators

The indicator on the *Plurality of digital markets* in candidate countries register, on the one hand, the dominance of tech giants such as Google or Meta in the online advertising market, and on the other hand, a deficiency of transparency, a lack of data, as well as weak media authority that lacks the capacity to follow up on these issues. As an exception, the authority in charge of competition in Türkiye did impose a fine in 2024 due to the practice of abusing its dominant position and merging data from users across platforms (Instagram and Threads), ultimately forcing Meta to separate these two platforms (Inčeoglu et al, 2025). This appears to represent the only case of a candidate country attempting to rebalance a bit of market power between publishers and online platforms. All candidate countries report having no alignment with the legal framework of the EU Copyright Directive. Likewise, negotiations with big tech companies to compensate for the use of media content, both from digital platforms and AI companies, are absent.

As mentioned above, the indicator on *Editorial independence from commercial owners' influence* shows the highest difference between candidate and EU countries. Namely, all candidate countries report commercial influence as media owners are often affiliated with the party in power and have other businesses in sectors such as construction, mining, banking, tourism and so on. These media owners develop clientelist relationships that are not regulated and do not protect the editorial side of the media. It has been highlighted that in North Macedonia for example, 'media owners are in practice creating media policies.' (Micevski & Trpevski, 2025, p. 24). In addition, self-regulatory mechanisms are very weak and ineffective in protecting journalists from these influences. For example, all countries have measures to curb disguised advertisements but in practice

they do not manage to stop media from publishing unlabelled commercial content. Due to these issues, journalists succumb to self-censorship, and the line between commercial and editorial content is often blurry.

As for the indicator on the *Transparency of media ownership*, the score for candidate countries is medium-low. Several differences distinguish candidate countries from one another. Namely, in Türkiye, the system is either set in such a way that accessing the records require knowing national ID, making the search difficult; media are not under obligation to publish ownership data on their websites (Inčeoglu et al, 2025). In the Republic of North Macedonia, transparency is present for broadcasters and print but not in the digital market (Micevski & Trpevski, 2025). Meanwhile in Albania, transparency is not regulated in the digital or print markets (Likmeta & Voko, 2025). In Serbia, where media outlets are not considered legal entities, financial reports are available but only for the owner's entire company, and not for the specific media business, which keeps the specific financial situation obscure (Milutinović, 2025). Positive steps have been noted in Montenegro after the adoption of the Law on Media which obliges media in all sectors to provide ownership information (Brkić Ružić, 2025).

Recommendations for candidate countries

To reduce the risks to media pluralism in the Market **Plurality** area, the following recommendations are proposed for relevant actors.

States should:

- Ensure that ownership transparency adequately covers all media sectors (audio-visual, print, digital) as well as introducing transparency obligations for media providers and for media authorities in line with the standards set up in the EU by EMFA.
- Ensure that the financial data on media revenues is easily accessible and regularly updated.
- Ensure that regular evaluations of media concentration in the market and its effects on media pluralism are conducted.
- Strengthen the independence and capacities of national regulatory authorities.
- Align the regulation on digital markets with the EU regulatory framework including data sharing obligations by digital gatekeepers.
- Align the national legislation with the EU Copyright Directive.

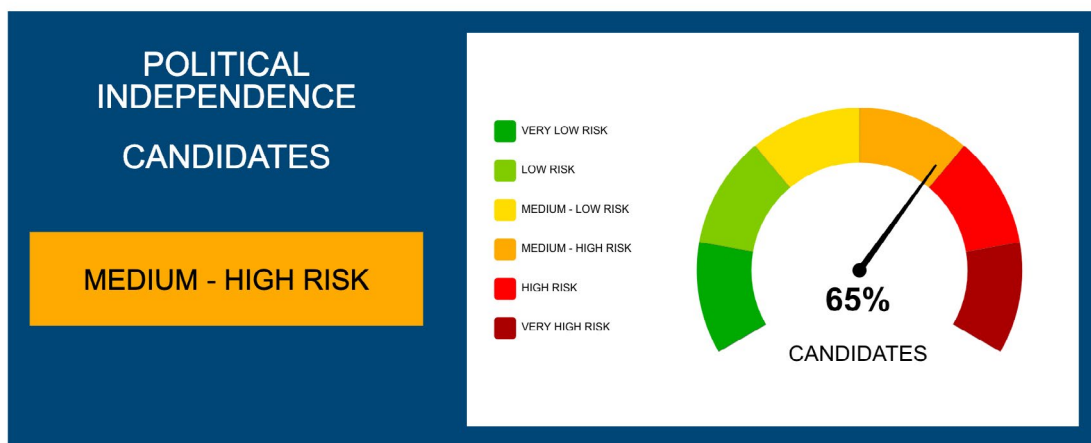
National regulatory authorities should:

- Regularly collect media market, readership and audience data.
- Improve cooperation with other relevant institutions and bodies to assist various aspects of market plurality challenges (such as ownership and commercial influence).

The media community and journalists' associations should:

- Strengthen and enforce self-regulatory mechanisms to protect journalists from commercial pressures and influence by the owners and avoid forms of self-censorship.
- Publicly disclose all relevant ownership information in line with the law.
- Introduce the internal and organisational safeguards within media outlets to protect from commercial and owners' influence in line with EU Commission recommendation on internal safeguards (Commission Recommendation (EU) 2022/1634).
- Create a common front to negotiate the agreement between GenAI companies and media publishers.

6.3 Political Independence in candidate countries

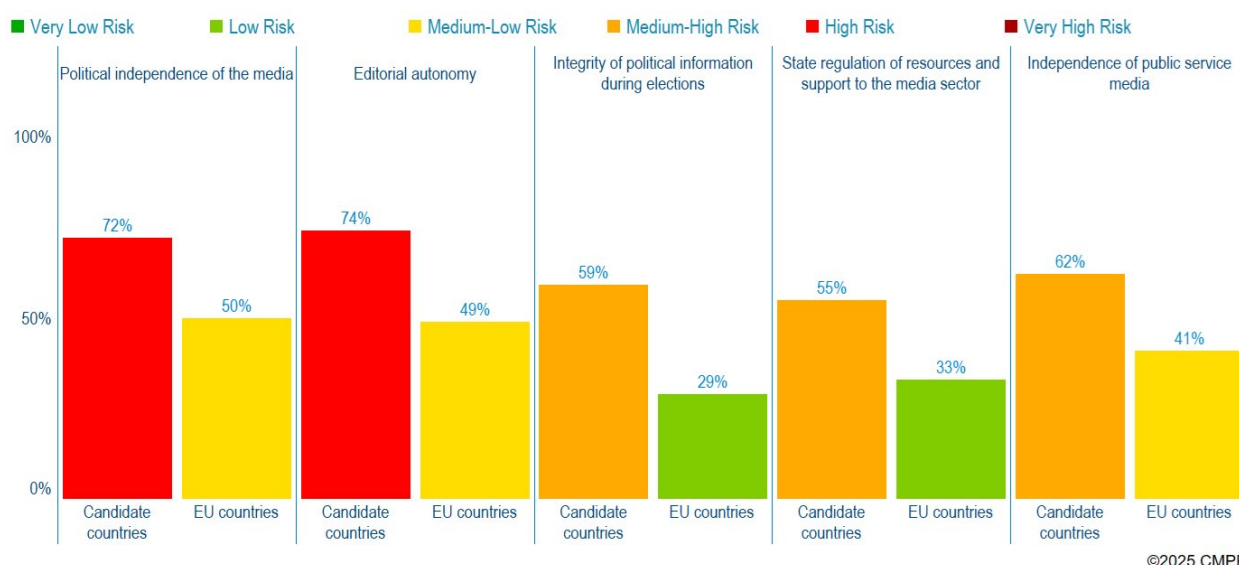


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The risk for the **Political Independence** area is assessed as medium-high for candidate countries and shows significantly higher levels of concern compared to the EU-27 results. The indicators with the worst scores are *Editorial autonomy* and *Political independence of the media*, both falling within the high-risk band (medium-low for the EU-27). This reiterates accounts from reports that highlight strong political influence over

the media sector in all candidate countries, facilitated by absent or weak self-regulatory mechanisms. The biggest difference between EU and candidate countries is registered for the indicator on the *Integrity of political information during elections*, reflecting significantly higher concerns in terms of balance in the representation of political viewpoints in election times in both PSM and private media. Higher results are detected in other sub-dimensions as well, such as the *Independence of public service media indicator* and *State regulation of resources and support to the media sector indicator*.

Figure 6.e. Risk per indicator for the Political Independence area for candidate countries vs. EU Member States



Focus on Particular Indicators

In the indicator on *Editorial autonomy*, the effectiveness of both internal and external mechanisms is limited in all candidate countries. Even though some legislative improvements have been noted in Montenegro and Serbia in this regard, the effects are either yet to be seen or do not show much enhancement in practice. One of the main concerns detected within the present indicator is the lack of safeguards aimed at guaranteeing independent appointments and dismissals of editors-in-chief. The results for the candidate countries show that such procedures are inherently linked to politicised ownership structures, with deleterious consequences for editorial independence.

Against such occurrences, few private media outlets have incorporated internal safeguards aimed at protecting editorial output from political interference (such as internal codes of ethics or internal bodies). Even where available, the internal safeguards can be considered highly ineffective. External safeguards, such as collective and/or cross-sectoral codes and media councils are more generally in place. However, these often lack a specific view on political influence and they might not be accepted by most media (for

example in Albania) or might be burdened with financial issues hindering their activity (for example in the Republic of North Macedonia). Overall, they generally lack hard powers to act against formal and informal pressures. In Albania, there has been a worrisome trend of ‘allegations of blackmail and connections between media outlets and organized crime’ (Likmeta & Voko, 2025, p. 25). In Serbia, members of collegium and editorial staff left the weekly, NIN, right after the new owner announced an editorial change as they did not receive assurances that they would be able to continue working in the same professional and uncompromising manner as before (Milutinović, 2025). On a positive note, in the Republic of North Macedonia, non-profit media demonstrate a higher level of resilience than private media, as they are less dependent on commercial financing and as such, are less susceptible to political/commercial considerations (Micevski & Trpevski, 2025).

Regarding the *Political independence of the media*, the control by owners with close political ties has been registered in all the candidate countries. In Türkiye, over two-thirds of Turkish media outlets are owned by conglomerates affiliated with politicians in power (Inčeoglu et al, 2025). The political control of the media in Serbia is also substantial. This control even spills over to media in Montenegro that are of Serbian (foreign) ownership and that try to influence the information distribution in that country (Brkić Ružić, 2025). In one particular case in the Republic of North Macedonia, the media owners actually pressured political structures to lift a ban on state advertising and thus opened the door for more political influence in the future (Micevski & Trpevska, 2025).

Independence of public service media poses yet another strong challenge for candidate countries. The capture of PSM and political influence is particularly evident in the appointments and dismissals of directors/top management, and this is often replicated at the level of editors-in-chief. In Türkiye, where the situation appears the most worrisome, the president directly appoints the general manager of TRT. Moreover, the government also decides on media funding without transparent public involvement, leading to biased media coverage (Inčeoglu et al, 2025). A similar situation is observed in Serbia, where objective reporting is also lacking in the public service media (RTS)—this has been particularly visible during the mass student protests (Milutinović, 2025).

The year 2024 was an election year for all candidate countries except Albania. During this period, breaches to the indicator on *Integrity of political information during elections* have been noted. In fact, a systematic bias and higher representation of parties in power was recorded in all countries (including Albania, for 2023), regardless of the regulations that were set in place to secure balanced reporting. Türkiye, Serbia, and Albania demonstrated similar risks for both PSM and major media outlets. As for Montenegro, unbalanced reporting was instead visible to a greater extent in major commercial outlets than in national PSM, which demonstrated progress. In addition to regulatory gaps and deficient implementation, fair and balanced representation of political viewpoints can also be affected by a lack of resources. This happened, for example, in the Republic of North

Macedonia, where PSM's financial difficulties hindered the proper coverage of both the 2024 presidential and parliamentary campaigns.

Furthermore, online political advertising is reported to be inadequately regulated in all candidate countries. This creates opportunities for political contestants to spread their political messages in hidden and problematic manners, while escaping public accountability. Moreover, in the absence of thresholds for electoral expenditure, parties with greater financial means can take advantage of the situation. In Türkiye, the 'ruling-party affiliates and anonymous accounts spent millions on the Meta platforms, flooding digital spaces with targeted messaging, while the opposition parties struggled to compete, deepening electoral asymmetry' (Inčeoglu et al., 2025, p. 29). A fundamental problem relates to the transparency of electoral expenditure: in Montenegro, the Agency for Prevention of Corruption publishes reports for both social platforms (Facebook and Instagram only) and banners and advertisements on online portals, however without providing proper breakdowns per category (Brkić Ružić, 2025). Another example comes from Serbia, where political advertising on social media platforms is allowed during periods of campaign silence, as the Law on the Financing of Political Activities fails to regulate social media (Milutinović, 2025).

Finally, within the indicator on *State regulation of resources and support to the media sector*, the sub-indicator on *Distribution of state advertising* has been evaluated with the highest-risk band (very high). In Türkiye, state advertising distribution is centralised through the Press Advertisement Agency (BİK) and it has criteria that discriminate against smaller independent and local media. State advertising rules in other countries are set in such a way that easily permits misuse, either through advertising agencies (for example in Albania) or because advertising contracts are signed directly with the media outlet without any public procedure (for example in Serbia). There are also cases of inactive online portals that only become active during electoral periods in order to receive a segment of state funding (for example, in the Republic of North Macedonia). All this is aggravated by a substantial lack of transparency.

Recommendations for candidate countries

To reduce the risks to media pluralism in the **Political Independence** area, the following recommendations are proposed for relevant actors.

States should:

- Adopt the EU regulation related to political advertising online as well as ensure that the financial costs incurred are published.
- Ensure the implementation and enforcement of equal representation of all political actors in electoral campaigns in both PSM and mainstream media.

- Ensure that the election of general manager and board members of PSM is free from political influence.
- Ensure that state advertising distribution follows criteria of fairness and transparency.
- Ensure that anti-corruption bodies investigate ties between media owners and political actors.

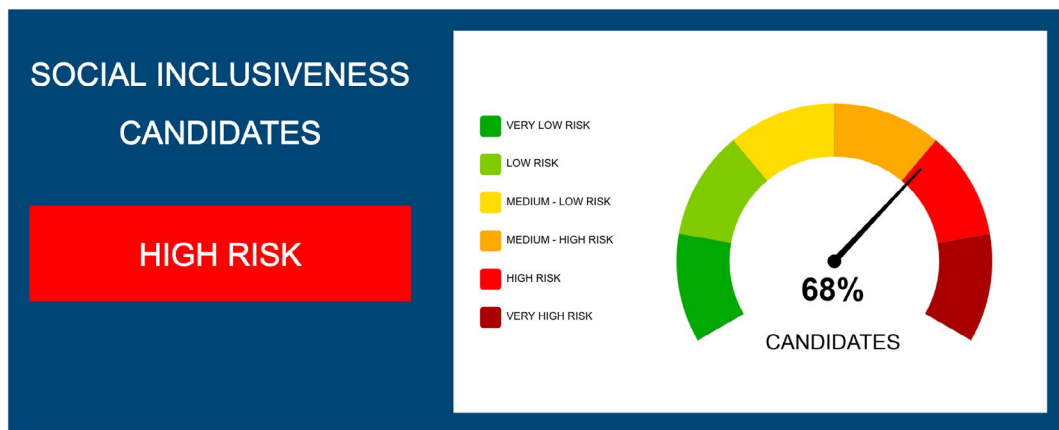
Media community and journalists' associations should:

- Establish and strengthen internal safeguards in media outlets to protect journalists from political influence in all sectors in line with the new EU legislation (e.g. EMFA).
- Conduct independent monitoring and analyses of the effectiveness of self-regulatory mechanisms; propose and implement measures for their proper functionality; and strengthen the capacity of self-regulatory bodies and their financial sustainability in line with the new EU legislation (e.g. EMFA).
- Monitor the work of national regulatory authorities to ensure transparency and oversight.

Very large online platforms should:

- Improve digital ad libraries' data accessibility and comprehensiveness.

6.4 Social Inclusiveness in candidate countries

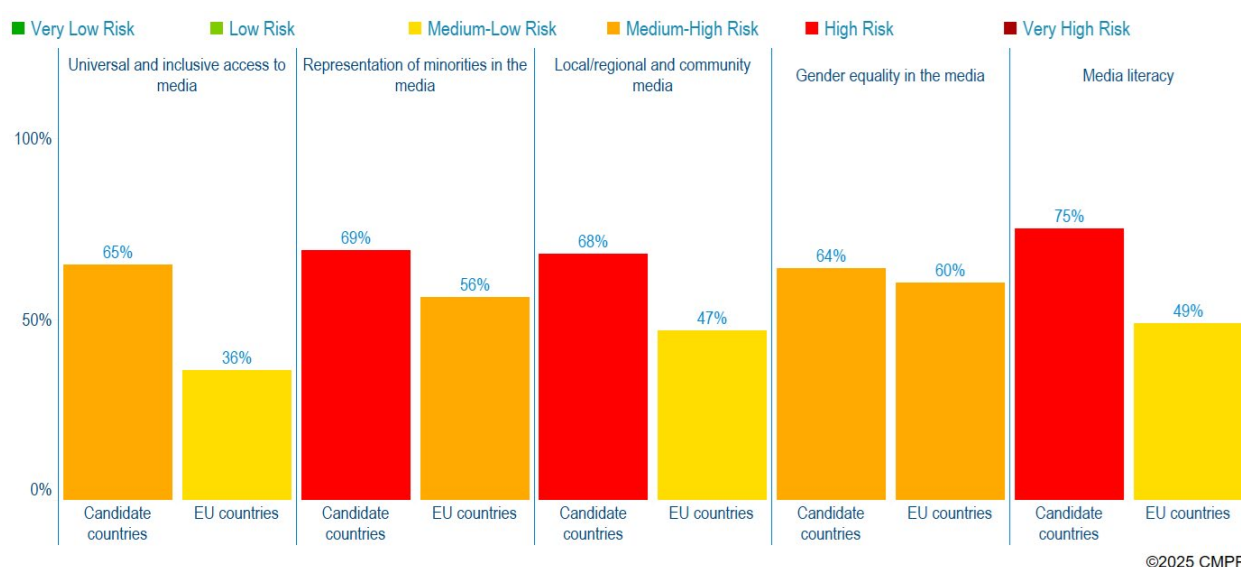


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The **Social Inclusiveness** area shows a high-risk assessment and is higher for the countries that are candidates for the EU than for the EU-27 (medium-high). It shows the fragility of media access for less dominant groups within these countries (minorities, marginalised groups, women, people with disabilities). Within the **Social Inclusiveness** area,

the indicators of *Media literacy*, *Representation of minorities* and *Local/Regional and community media* perform the worst (high-risk band) and in addition, the state of media literacy and challenges with local and community media are considerably better evaluated in EU Member States (medium-low-risk band). These results suggest that candidate countries are lagging with various media literacy aspects (such as media literacy skills, governance framework, lifelong media literacy activities and so on) and that local, regional and community media in already difficult circumstances for the media sector in general, are even more endangered due to their more vulnerable position, which in turn suggests the spread of news deserts (Verza et al., 2024). This is particularly highlighted in Türkiye where local media are subjected to increasing political and financial pressures and their numbers are rapidly diminishing. (Inçeoglu et al., 2025). The various issues also persist when it comes to *Universal and inclusive access to media*, where fixed broadband access and its homogeneity across regions is particularly problematic (Albania, Montenegro, Serbia and the Republic of North Macedonia are all assessed as very high risk) and accessibility of programmes for people with disabilities has been reported to have certain limitations in all candidate countries (Albania, Montenegro and Serbia reported very high risk for the access for people with disabilities). Finally, the scores for candidate countries in the *Gender equality in the media* indicator is not different to the situation registered in EU Member States (medium-high-risk band), with noted challenges related to the representation of women in the media.

Figure 6.f. Risk per indicator for Social Inclusiveness area for candidate countries vs. EU Member States



Focus on Particular Indicators

The *Media literacy* indicator scores the highest risk band within the **Social Inclusiveness** area. It points to deficiencies mostly in terms of a government's strategic and comprehensive approach. Candidate countries are still burdened with adequately implement-

ing basic steps of media literacy activities and policies in a comprehensive way. Media literacy is not yet part of the compulsory curriculum in almost all candidate countries (with the exception of the Republic of North Macedonia). Media literacy activities are mostly left to civil society organisations. Besides, systematic tracking of development of media literacy skills is lacking, thereby creating quite fragmented effects in this area.

The *Representation of minorities in the media* is another challenge for candidate countries. Namely, representation of minority and marginalised groups is very limited, particularly in private media outlets. Policies and measures against hate speech are mostly ineffective, in the absence of a strategic and coordinated approach. In Serbia, for example, hate speech cases and aggressive communication is abundantly present and even comes from state officials who often use such discourse to target journalists, the outcome being physical or verbal attacks (cited in Milutinović, 2025). In Türkiye, the legislation against hate speech and disinformation is essentially used for state censorship rather than for fighting this phenomenon (Inçeoğlu et al., 2025). In Albania, there is a voluntary cooperation between the media regulator and TikTok, but after multiple cases of social media induced violence and suicide the Prime Minister stated the intention to adopt a TikTok ban for one year (Likmeta & Voko, 2025). In Türkiye, as also reported, there were some positive developments that were led by CSOs, which even involved using AI for online hate speech detection. However, for these measures to be effective they require institutional involvement and an adequately comprehensive approach. In Montenegro, the Media Strategy mentioned the Network for the fight against hate speech, online harassment and disinformation, but this has still not been implemented (Brkić Ružić, 2025).

Finally, *Local/Regional and community media* are struggling to survive, and news deserts are also forming in candidate countries. Due to their fragile position, some of these tend to be tied to political centres of power and provide one-sided, biased coverage that does not inform in the public interest. The state in some countries does not provide subsidies or support schemes to assist local media (such as in Albania and North Macedonia), or in other countries, for example in Türkiye, state support was reduced for local media due to austerity measures and state advertising is given under highly discriminatory criteria for local and regional media, thereby endangering their sustainability (Inçeoğlu et al., 2025). In Serbia, the practice of subsidy distribution was reduced and support was instead once again given to less critical local media outlets, only this time through a more obscure process (Milutinović, 2025). However, in Montenegro there has been a legal improvement in terms of local public media governance, as civil society representatives are now included on local public media boards and in addition to this, a fixed amount of financial support is provided. The purpose of these measures was to strengthen the independence of local public media from undue influences (Brkić Ružić, 2025).

Recommendations for candidate countries

To reduce the risks to media pluralism in the **Social Inclusiveness** area, the following recommendations are proposed for relevant actors.

States should:

- Ensure higher representation of minority and marginalised groups in both private and public media.
- Ensure that media accessibility for people with disabilities is improved through enforcement of legal provisions and minimum availability standards, and secure effective enforcement.
- Ensure the independence of local and regional media, and provide fair and transparent financial support with the aim of improving their sustainability.
- Develop strategic and systematic approach to media literacy policy development across a variety of population groups, and ensure adequate implementation.
- Secure the adequate development and implementation of mechanisms and legal solutions to fight against online hate speech.
- Create mechanisms to prevent hate speech initiated by public officials.

National regulatory authorities should:

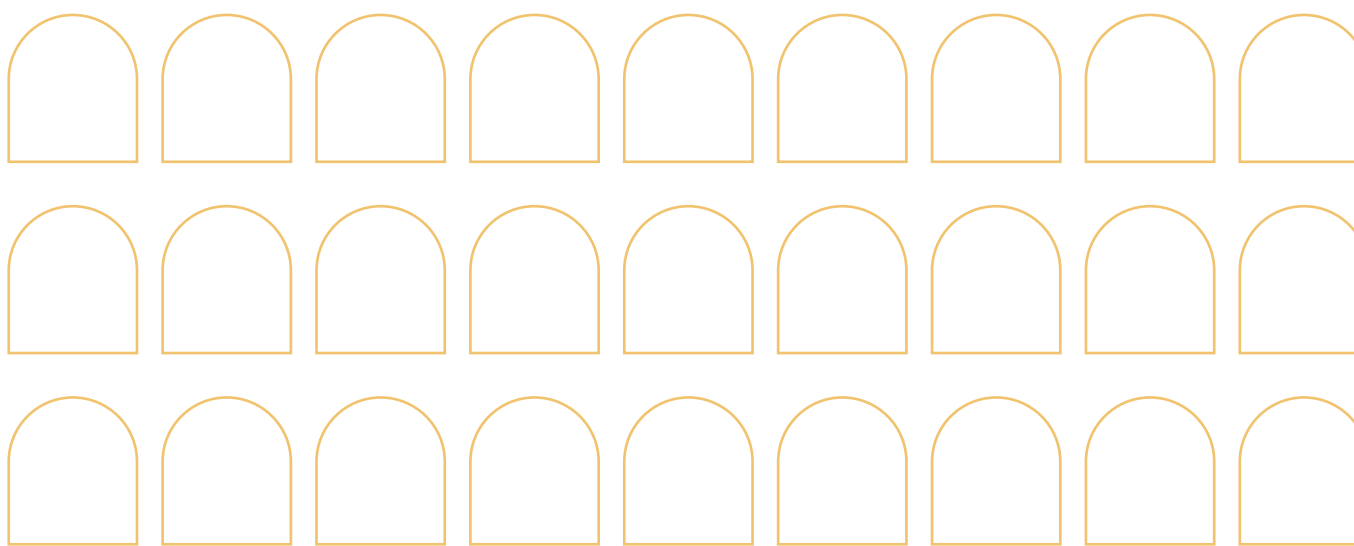
- Closely follow and monitor the compliance with media accessibility of various less dominant groups in a society.

The media community and journalists' organizations should:

- Develop inclusive editorial policies both in the media coverage of diverse communities and by including diverse members of communities in news content creation.
- Continuously organise trainings to improve reporting on marginalised, minority and vulnerable groups.

All relevant stakeholders should:

- Support research on local media challenges and news deserts in candidate countries.
- Develop supporting mechanisms that would ensure that VLOPs and VSPs are more proactively involved in the fight against online hate speech.



CHAPTER 7. Recommendations

7.1 Fundamental Protection

The area of **Fundamental Protection** in MPM2025 recorded several trends, including negative ones as well as best practices, which could guide the relevant stakeholders working on media policies and strategies to respect the fundamental rights of freedom of expression and media freedom. Disrupting events like wars and climate change appear to have had a profound influence on freedom of the press. Journalists covering sensitive issues, including corruption and elections, get ‘SLAPPed’, or suffer physical threats (especially at demonstrations) or online threats (harassment, doxing, spoofing, surveillance and so on). Journalists may also have seen their content unjustly moderated online by platforms devoid of editorial responsibility or opaque algorithms. Comparable risks are run by whistleblowers, even though the EU Whistleblowing directive has finally been transposed in all the EU countries. The possibility for journalists and newsrooms to access public documents under FOIA laws is still not completely effective. The year 2024 was a crucial year for EU media policy: the anti- SLAPP Directive and EMFA, as well as the AI Act were all enacted, while the DSA entered into force. All this considered, the following section outlines a series of recommendations for diverse stakeholders in the media landscape:

EU institutions should:

- Ensure a timely transposition of the EU- anti SLAPP directive in the legal frameworks of Member States (MSs), in a way that is also in line with the Council of Europe’s approach in Recommendation CM/Rec(2024)2.
- Ensure a timely implementation of EMFA in the MSs, in line with ECtHR and CJEU case law, with particular regard to art. 4 EMFA, to ensure that there is no room for governments to use vague national security claims to justify surveillance of journalists, or to outsource it to private companies.
- Enforce the DSA where an accurate balancing exercise is done with due regard

to freedom of expression and of the press, especially in the context of content moderation by VLOPs, the access to data by researchers, and the protection of public rights' defenders from online harassment.

- Ensure that VLOPs comply with their obligations under the DSA by providing all required data for transparency reporting, with particular attention to country-specific breakdowns. The provision of granular, disaggregated data is essential to enable accurate national-level risk assessments and informed policymaking.
- Provide financial support to independent initiatives aimed at increasing platform accountability, including civil society projects and academic research that investigate opaque content moderation practices such as shadowbanning.
- Support initiatives aiming at strengthening information integrity and tackling disinformation, with a focus on resilience building, strong independent media and increasing platform responsibility. In addition to introducing meaningful transparency and responsible use of algorithms on large services, the prominence of quality news and the establishment of European competitors should be encouraged.
- Monitor the full implementation of the Whistleblowing Directive (EU) 2019/193.
- Enact more binding measures safeguarding the working conditions of journalists (including a meaningful enforcement of the Minimum Wage Directive 2022/2041).

Member States should:

- Enact or enforce existing laws protecting journalists from attacks and harassment, with special attention dedicated to preventing online threats and surveillance.
- Enact labour laws guaranteeing minimum wages and social security schemes for journalists.
- Transpose the EU Anti-SLAPP Directive, including in the scope of application domestic SLAPPs and civil lawsuits.
- Decriminalise defamation, also towards public figures and institutions; exclude imprisonment as a sanction.
- Implement the EMFA, ensuring that national legislation is in line with this EU regulation in the fields of banning the surveillance of journalists;
- Ensuring that NRAs- both media authorities and DSCs, are independent and adequately budgeted and staffed.
- Implement the DSA, guaranteeing that DSCs link their enforcement to bench-

marks of the new Code of Conduct on Disinformation, not only by verifying that platforms submit their reports but align with Code commitments when assessed under the DSA's systemic risks provisions. .

- Train judges and public order forces to respect the rule of law, and the principles guiding the anti-SLAPP Directive and EMFA.
- Provide mechanisms to guarantee the enforcement of access to information laws.
- Provide the full implementation of the laws transposing Directive (EU) 2019/1937 on the protection of whistleblowers, including the promotion of awareness campaigns.
- Establish or strengthen cross-border cooperation mechanisms with countries facing similar FIMI campaigns in order to share early-warning signals, analyses, and effective mitigation strategies.
- Address the threat of disinformation and other challenges to information integrity by emphasising resilience building and the strengthening of independent media.

Public authorities (judiciary, police, national regulatory authorities) should:

- Guarantee independence and respect for the rule of law, especially in the context of demonstration, precautionary arrests, and surveillance.
- Engage in training on issues related to media freedom.
- Enforce the DSA and EMFA in an independent manner that is oriented towards guaranteeing the fundamental right to freedom of expression.
- Commit to regular, detailed, and disaggregated public reporting on all content moderation requests submitted to VLOPs.

Newsrooms, and journalistic organisations should:

- Advocate and guarantee adequate working conditions and social security schemes for their employees and members.
- Design and set up psychological support mechanisms for their employees and members targeted by SLAPPs, harassment and other professional threats.
- Set up funds or insurances for sustaining the legal and personal expenses of journalists in the case of SLAPPs.
- Systematically and collectively document suspected instances of shadowbanning or visibility suppression, particularly when these concern content of public interest. This practice would help build a basis for assessing the fairness and proportionality of platform moderation.

Very large online platforms should:

- Proactively adapt to the new regulatory landscape under the DSA and EMFA. Providers of VLOPs and VLOSEs should align their design and algorithmic systems with democratic principles, and ensure that their content moderation practices fully reflect the obligations under the DSA and Article 18 EMFA, properly balancing freedom of expression and other interests at stake.
- Introduce meaningful action to limit disinformation, FIMI and other information integrity challenges on their services, including the transparent labeling of political and issue-based advertising, increasing transparency, introducing responsible algorithmic design and the wide-ranging demonetisation of disinformation actors. The EU's Code of Conduct can serve as a guidance for responsible action.
- Adopt specific safeguards for journalists who are frequently targeted by online harassment campaigns (including hate speech, doxing, impersonation, and hacking attempts), and ensure they are afforded appropriate protections.

7.2. Market Plurality

The results of the MPM2025 confirm the threats to media pluralism deriving from an excess of market power related to media ownership concentration and to the gatekeeping role of digital intermediaries. The reduction of external pluralism adds to risks for the integrity of editorial content, in cases in which the self-regulatory safeguards and legal protection do not protect the newsrooms from commercial pressure and from the influence of owners' interests - often intertwined with non-media undertakings and with political activities. In the time span of the MPM2025 assessment, it was too early to register the impact of the evolution of the regulatory framework, with EMFA provisions on the common media market and the full implementation of other pieces of EU legislation potentially impacting the media market, in particular the Digital Markets Act. However, the economic trends towards concentration continued, with new challenges related to the role of (and the impact on) the media in the Generative AI transformation. In parallel, the economic sustainability of the media registered a slight improvement, not including the newspapers sector, which continues to decline. Signals of resilient business models and practices are present in some countries, with a positive - although limited - role of public subsidies in incentivising innovation and public interest media. The main challenges ahead in the **Market Plurality** area regard the implementation of new EU legislation in terms of transparency and editorial independence; the introduction, within national rules, of the so-called 'Media plurality test' to assess the impact of media market concentrations on media pluralism and editorial independence; the evolving economic relation-

ships between media content providers and digital and tech companies; and finally, the development of AI, both in terms of the monetisation of original media content and the competition of the AI-produced content. To address the economic threats to media pluralism, the MPM2025 outlines the following recommendations:

EU institutions should:

- Monitor the implementation of obligations regarding the disclosure of media ownership information, including the development of national databases, as set out in Article 6(1) and (2) of EMFA.
- Guarantee the effectiveness of a harmonized legal framework on media market concentrations. In particular, EC and the European Board of Media Services should provide detailed guidelines for the implementation of art. 22 EMFA, specifying the order of priority of the elements to be taken into consideration to assess the impact of media market concentrations on media pluralism and editorial independence.
- Strengthen the competition enforcement and adopt effective remedies and sanctions to address abuse of market power in the digital advertising market.
- Enforce the transparency and data sharing obligations of digital gatekeepers, under the DMA, in the digital advertising sector.
- Guarantee updated copyright protection for media content used by platforms and to train Generative AI systems, under the new digital regulations, including the AI Act and its Code of practice.
- Evaluate the adoption of a digital service tax and the possibility of earmarking part of its revenue to support media pluralism.
- Provide dedicated support for independent news media and facilitate knowledge sharing on media financing and innovation.

Member States and national regulatory authorities should:

- Implement and oversee compliance with obligations on the disclosure of media ownership information and the development of national databases, as set out in Article 6(1) and (2) EMFA.
- Provide new rules, or update the existing ones following the EU guidelines, to effectively apply the EU regulation on the assessment of media market concentrations (art. 22 EMFA).
- Collect better statistics on all segments of the media industry as well as on the advertising market.

- Introduce adequate and fairly allocated public support schemes for private media.
- Collect and publish market and audience data on all the media sectors, developing standardised methods of measurement for digital media consumption.

The media industry and journalists' associations should:

- Comply with the media ownership transparency obligations set out in Article 6(1) EMFA.
- Pursue collective agreements with the online platforms and tech companies developing AI systems to guarantee that the monetisation of media content benefits the whole chain of media production and the plurality of media outlets.
- Introduce safeguards for editorial independence and the integrity of journalists and editors, in line with the Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector.
- Adopt guidelines on the use of AI in newsrooms and in the media (also) aimed to guarantee fair remuneration for authors and creators.
- Promote innovations and the sharing of best practices in journalism.
- Strengthen self-regulation and press councils to support newsrooms' independence from owners and commercial interests.
- Promote the separation of commercial and editorial activities in newsrooms.
- Promote the disclosure of news media owners' and managements' conflicts of interest.

7.3. Political Independence

As is consistent with previous MPM implementations, one of the most significant sources of risk in the private media sphere remains the entrenchment of political control through ownership of the media. Particularly problematic is the untransparent and widespread use of informal clientelist networks, especially via proxy-ownership, which allow political elites to maintain a high degree of influence without formal accountability. This situation is backed by weak and only partly effective self-regulation, with the MPM2025 analysis documenting several occurrences in which political figures or government-aligned actors influenced editorial leadership in private outlets, ultimately eroding journalistic independence. In the 2024 electoral year, audiovisual media provided fairly balanced coverage of political contestants. However, severe concerns continue to be detected with online political advertising, especially on social media platforms. The distribution of public funding

to media for institutional campaigns and messages is also assessed as particularly problematic. Finally, public service media continue to face considerable threats, as governance and funding procedures are in many cases politicised based on outdated legislation and malpractice. Against these persistent risks, the new regulatory input from the EU – EMFA in particular, but also the Regulation on the Targeting and Transparency of Political Advertising – started fostering legal discussions and reforms at the country level. While it was too early to assess the impact of these reforms with the current analysis, the next implementation of the MPM will certainly provide more ground for understanding the real effects on the European media sphere. Here, the MPM outlines a series of recommendations for reducing the risks in terms of political control and influence in both the commercial and public media sphere:

EU institutions should:

- Monitor the implementation of obligations regarding the governance and funding mechanisms of public service media, set out in Article 5 of EMFA.
- Monitor the implementation of obligations regarding the distribution of state advertising, including the development of national databases, set out in Article 25 of EMFA.
- Monitor the implementation of the Regulation on the Targeting and Transparency of Political Advertising

Member States and public authorities should:

- Properly implement the rules against conflict of interest and/or direct and indirect political control. States must also strengthen the regulatory framework so as to prevent proxy control and to ensure that ownership and control regimes also fully apply to the digital sphere.
- As provided by EMFA Art. 6(2), set up oversight mechanisms and transparency portals bringing to light beneficial ownership and patterns of control.
- Reinforce safeguards at the local level. Where this is the case, states must regulate ownership and control by municipalities, for example, by excluding municipal outlets from the possibility of registering as a publication.
- Secure governance and funding structures of state-owned news agencies from political bargaining.
- Set up or reinforce cross-sectorial regulatory safeguards to protect editorial structures and content, such as media statutes and rules for protecting the appointments and dismissals of editors-in-chief from owners' or any other interference.

- Ensure that regulation for balanced/fair political communication in election times is comprehensive and updated to the digital era. To ensure this does not impede smaller parties and candidates from getting heard.
- Ensure that institutional communication does not overlap with political communication, generating imbalances in the representation of political actors running in electoral contests.
- Adapt their legal frameworks to the Regulation on the Targeting and Transparency of Political Advertising. Online political advertising must be carefully regulated and monitored, especially on main social media platforms.
- Ensure that regulation aimed at allocating direct grants or indirect support respects principles of fairness and transparency, with a view at the local dimension. Criteria must be made clear and duly justified. Such public expenditure must be made available for public scrutiny.
- Strictly follow legal indications foreseen by Art. 25 EMFA with regards to state advertising, ensuring plurality and transparency of distribution. In addition, states should set up an independent and competent authority with oversight powers. Likewise, national databases should be established.
- Reform governance and funding structures/mechanisms of PSM, so that they respect Art.5 EMFA. Strong safeguards must be set up to the level of editors-in-chief.

The private media industry should:

- Make insightful data on their ownership and management structures public.
- Set up or reinforce sound internal self-regulatory mechanisms such as codes of conduct, editorial boards, or ombudspersons that would protect from/mediate with owners of the media, as foreseen by the 2022 Recommendation on internal safeguards for editorial independence and ownership transparency in the media sector.
- Where the system foresees it, ensure that political advertising is sold equally to all political contestants, without discrimination. If the system forbids paid political advertising, ensure that airtime is effectively allocated following sound criteria of fairness.
- Make the amounts paid by political contestants –or those paying on their behalf– publicly available and comprehensible.
- Ensure that political advertising is never disguised as editorial content.

Public service media should:

- Ensure the strict separation of editorial structures and content from management and any consideration. For doing so, set up or reinforce internal guidelines, mechanisms, and bodies, so as to ensure resilience against any potential interference over editorial content.
- In the electoral period, ensure plurality and diversity in the representation of political candidates and viewpoints.
- Ensure that plurality of coverage and diversity is, by principle, strictly followed also in non-election times.
- Commit to transparency in management, spending and editorial decisions
- Play an active role in democratic engagement and countering disinformation

Journalists' associations should:

- Bring relevant cases of control to public attention.
- Reinforce self-regulatory mechanisms so that they can resist more effectively against political control or influence. In addition, these associations should act as the drivers of implementation of the Recommendation on internal safeguards for editorial independence and ownership transparency in the media sector at the national level. In practice, this means reinforcing collective mechanisms aimed at the mediation and resolution of conflicts and controversies, with the ultimate goal of protecting editorial content from commercial and political interference.
- Encourage the establishment of internal self-regulatory mechanisms.

Political contestants should:

- Make expenditures and techniques used for political campaigning public. Amounts spent on political campaigning must be comprehensive, and should include breakdowns by sector (for example, audiovisual, radio, online media, online platform) and by media (e.g. listing such expenditure per outlet/platform).
- Respect democratic rules in political campaigning.

Very large online platforms should:

- Improve the searchability and precision of ad libraries to facilitate the tracing of political advertising.
- Ensure that reporting systems for political advertising are implemented effectively and equally in all Member States.

National regulatory authorities should:

- Cooperate proactively in the framework of the newly established European Board for Media Services.
- Monitor and report annually on the allocation of state advertising expenditure to media service providers and providers of online platforms.
- Where this is foreseen, ensure that balanced representation in electoral periods is respected.

7.4. Social Inclusiveness

In line with the conclusions of the MPM2024, the medium-low risk level associated with Social Inclusiveness in the MPM2025 reflects 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. However, the area of **Social Inclusiveness** is marked by massive differences between countries. Scandinavian countries and the Netherlands are making visible efforts and score within the low risk band, thus demonstrating innovative initiatives in the field of **Social Inclusiveness**. All other EU countries are associated with higher risks, resulting from important differences between indicators. Such differences are significant, as good performances in some countries provide interesting best practices that may be replicated. While universal and safe access to the media is adequate in most countries, the representation of women and minorities in the news remains the main concern for the area. Despite the frequent lack of data, systematic quantitative and qualitative biases are visible in the representation. Media literacy also presents some significant challenges in most countries. In the absence of concrete and up-to-date policies, media literacy skills remain low among the population. Based on these observations, the following stakeholders should implement the following recommendations.

EU institutions should:

- Clarify the notion of appropriate prominence as contained in Article 7a of the AVMSD to help countries trigger discussions and concrete initiatives on the matter.

Member States and public authorities should:

- Increase legal obligations and provide quantified targets for PSM and commercial companies in terms of media accessibility support for people with disabilities, especially regarding audio-descriptions.
- Make ISP market share data publicly available. Transparency regarding how ISPs manage network traffic should also be improved.

- Consider the creation of funding to support local media as an essential element to fight against news deserts. The experience of the Swedish Media Support Fund can provide an interesting example.
- Ensure that police forces are trained on aspects of online hate speech, and on delivering responses to provide immediate and effective support for hate speech victims.
- Trigger stakeholder discussions to increase the fight against hate speech online, involving VSPs and VLOPs which often do not contribute sufficiently to the fight against hate speech.
- Adopt a legal definition of community media if not yet legally recognised, or re-adapt the actual definition to include other forms of media outlets beyond radio and TV.
- Include the obligation of gender parity in media management boards within the PSM service contract.
- Provide an up-to-date and comprehensive definition of media and information literacy. 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 that ‘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.
- Rethink the education system to boost the resilience of young generations and provide long-term funding to ensure an effective action plan.

National regulatory authorities should:

- In partnership with PSM, implement a systematic quantitative and qualitative monitoring of their content to assess the representation of all groups in society including minorities, marginalised groups and women and take steps to improve the representation of these groups. The experience of the Finnish public broadcaster Yle is an example of good practices to replicate.

Public service media and commercial media companies should:

- Adopt a comprehensive charter to ensure a proportional and free-of-stereotype representation of minorities and marginalised communities.

- Reach gender parity in management positions (from middle management to the management roles).
- Develop gender equal editorial policies and organise training sessions on gender-equal reporting.
- Work in partnership with NGOs focusing on media accessibility for people with disabilities to develop tools that are adapted to their needs and investigate the potential of AI to increase media accessibility for people with disabilities.
- Develop inclusive editorial policies, both in media coverage of diverse communities and by including diverse members of communities in news content creation.
- Training sessions to improve reporting on marginalised, minority and vulnerable groups should be continuously organised.

Very large online platforms should:

- Collaborate with national authorities and public service media to define a strategy to guarantee the appropriate prominence of public service media.
- Actively contribute to the fight against hate speech and provide national data to researchers to measure hate speech phenomena online. More country specific systemic risk assessment reports must also be provided.
- Collaborate with national authorities to develop adapted media literacy initiatives in national languages

The media community at large should:

- Work on a joint platform to improve the position of local media and visibility of challenges they are facing.
- Work towards gathering more research data on the representation of marginalised groups, particularly in private media outlets.

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ANNEXE 1 - METHODOLOGY

The MPM is a holistic tool that is designed to identify the potential risks to media pluralism in EU Member States, with a specific focus on news and current affairs. The research design of the MPM was developed and tested during two pilot implementations in 2014 and 2015. In practice, the Media Pluralism Monitor consists of a 200-variable questionnaire that encompasses the different components and meanings of “media pluralism”, based on existing standards, such as those that are promoted, amongst others, by the Council of Europe, the European Union, or the United Nations. The qualitative answers gathered through the MPM questionnaire are then used to quantify the risk to media pluralism in each country studied, according to a six-tier system of evaluation - from very low risk to very high risk, using a standardised formula (See section 3). As such, the MPM provides a unique quantitative and qualitative assessment of the risk to media pluralism in EU Member States and allows comparisons between countries.

1. MPM Questionnaire

The Media Pluralism Monitor questionnaire is divided into four areas as follows:

- **Fundamental Protection.** This area considers the necessary preconditions for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression; the right to seek, receive and impart reliable and accurate information; favourable conditions for the free and independent conduct of journalistic work; and the independence and effectiveness national regulatory authorities.
- **Market Plurality.** This area considers the economic dimension of media pluralism, to assess the capacity of the market to provide a plurality of independent information sources, and to favour consumption diversity. It evaluates the risks related to: lack of transparency of media ownership; concentration of media ownership, assessed both on production and distribution—that is, the media service providers as well as the digital intermediaries, such as search engines, social media and other algorithmic aggregators; threats to the economic sustainability of the media; and the influence of commercial and owners’ interests on editorial content. The online environment is fully considered in all the area’s indicators, with a focus on digital markets, which has its own dedicated indicator.
- **Political Independence.** This 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), as well as at the availability and effectiveness of self-regulation.

- **Social Inclusiveness.** This area assesses if access to the media is universal and inclusive, with specific focus on the level of media access of various 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 this area.

Each area is composed of 50 variables, grouped into sub-indicators (varying numbers), themselves grouped into indicators (5 per area). For the 2025 editions, the MPM questionnaire was composed of the following indicators:

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

The MPM questionnaire is composed of three types of questions: legal, economic, and socio-political.

- **Legal (L)** variables **assess the existence of legal safeguards**, and whether due process is in place to ensure the effectiveness of said legal safeguards. For example, *is freedom of expression recognised in the constitution or in national laws and case law in your country?*
- **Socio-political (S)** questions **provide a reality check on a specific issue in practice**. For example, *is freedom of expression respected in practice in your country?*
- **Economic (E)** questions are designed to assess **the risk to media pluralism linked to economic factors based on quantitative data** (e.g., market revenues, revenue trends, audience shares, employment). For example, *what is the market share of the Top4 audiovisual media owners in your country?*

Variables can either:

1. Be closed questions answered either by yes/no. For example, *is your country free of journalist killing?*
2. Have a three-option reply: low risk, medium risk, high risk. For example, *are there cases of attacks or threats to the physical safety of journalists? Answers in this case are either, low risk: no attacks, no threats. Medium risk: no attacks, some threats. High risk: attacks and threats take place.*
3. Be answered providing numerical values. For example, *what is the market share of the Top4 audiovisual media owners in your country? Please enter a percentage.*

While all the legal variables are either closed or three-risk questions, socio-political and economic variables are more varied. The majority of economic variables (e.g., indexes of concentration; revenue trends and so on) are found within the Market Plurality area.

Data used to fill the MPM questionnaire. The MPM is informed by both primary and secondary sources, which are collected by national country teams. Among the sources used by the country teams are: national laws, case law, governmental documents, NGO reports, official statistics, commercial sources/financial reporting, and academic research. 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 comparable across countries. The data described above are supplemented with primary data, gathered through interviews and document analyses of legal, academic and other

texts, together with the Group of Experts' evaluation (see below) for 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. The combination of primary and secondary data has proven to be a useful and effective approach in ensuring reliable and valid findings in the context of this project.

The MPM questionnaire is reviewed every year by the CMPF team. For the MPM2025, the CMPF team has updated the MPM questionnaire, taking into account several factors including regulatory novelties, social changes, the results of previous data collection, and newly available data. All the changes for this 2025 implementation are described in section 5.4. The full questionnaire is accessible [here](#).

2. Data Collection

Step 1 - Data collection by the country teams. For each edition, the MPM questionnaire is filed on an *ad hoc* online platform by the country teams composed of independent researchers with expertise in the field of media pluralism and media freedom. Country teams are essential for the implementation of the MPM. First, due to the reliance on secondary data, which is often in the native language, it is essential to have national experts who are not only able to collect these data but who are also able to evaluate their reliability and validity. Second, country teams have the ability to build on local networks, particularly with regard to local stakeholders. Their input in growing the network of informed stakeholders who join the discussion on media pluralism has proven to be invaluable over time. Finally, country teams are fundamental when it comes to providing answers to socio-political questions. Since quantitative ways of measuring certain issues are sometimes missing, country teams must provide their expert evaluations. Having a reliable and independent team, composed of renowned experts in this field, is therefore crucial for the implementation of this project.

All the countries for the MPM 2025 can be checked [here](#). In an effort to ensure continuity, and therefore improve comparability, also for 2025 most of the country teams remained unchanged. For Malta, the data collection was carried out directly by the CMPF team.

Step 2 - Internal peer-review of the data collection by the CMPF team. Once the country teams have completed the data collection, the CMPF team checks the quality and consistency of the data collected through the questionnaire, making sure that: 1) the methodology has been respected for each variable, 2) the answer provided by the country team is sufficiently sourced, and 3) the risk evaluation proposed by the country team is comparable between countries and across years.

Step 3 - External peer-review. Once the data collection has been reviewed internally by the CMPF team, other two external peer-review mechanisms guarantee the soundness of the MPM assessment.

1. **Group of experts.** The Group of Experts, composed of national stakeholders and experts, provides a peer-review of the answers provided by the country team for a selection of particularly sensitive and complex variables. The variables submitted to the Group of Experts either require a qualitative type of measurement or need answers that cannot be based on measurable and easily verifiable data. Based on the review provided by Group of Experts, the country teams either decide to confirm or modify their original assessments.
2. **External peer-review.** For a list of selected countries, the full data collection is independently peer-reviewed by a leading media scholar in the concerned country. The procedure aims to maximise the accuracy of the monitoring. In these cases, neither the data collection nor the country reports necessarily reflect the views of the peer-reviewer. However, the peer-reviewer acknowledges that there is enough empirical evidence to justify the risk assessment. The country reports that are submitted to this external peer-review may change every year and are selected in such a way that they represent all 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.

3. MPM Calibration

Once the data collection has been completed by the country team and peer-reviewed, the CMPF team proceeds to calculate the risk levels.

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).

Step 1 - Calculation of the risk assessment at the variable level

Each variable receives a score from 0 to 1, according to the answer provided by the country team. Scores closer to 0 indicate a low-risk assessment, while those closer to 1 indicate an assessment of high risk. Dichotomous variables with a yes/no reply, are rated 0 or 1. Polychotomous variables with three-option replies are rated 0/0.5/1, where low risk is associated with 0, medium risk with 0.5, and high risk with 1. For

variables with numerical values, the answer provided by the country team is formally translated into a level of risk (low, medium, high), using thresholds that are defined on existing standards (e.g. the Council of Europe, the European Union, or the United Nations) or based on percentile scores.

Besides the dichotomous or polychotomous answering options, the country team, when unable to provide an answer on the basis of available sources, can select one of the following options:

1/ **“Not applicable”** - When a variable is irrelevant or inapplicable to a specific country’s media system. For example, the variables related to regional and local media are deemed as irrelevant in the context of Malta, given the size of the island. Such an option was introduced in the MPM2015 to better capture the specificities of the national contexts. When a variable is considered as not applicable, it is nullified and not compute in the final risk score.

2/ **“No data”** - 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, 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, to determine a risk level, 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 absence of data cannot be explained, the following criteria were considered:

- Taking into account the local context: where 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 “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 in place since the 2020 MPM implementation for the **Market Plurality** area only. This was done to take account of the phenomenon of a lack of market data; 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 to assess concentration in the indicator on plurality of media providers (Top4 indexes measured on market and audience shares for horizontal concentration in audiovisual, radio, newspaper sector; Top4 index measured on audience share in the online sector; Top4 index measured on market share for cross-media concentration), and in the indicator on plurality in digital markets (specifically, in the sub-indicator on online platform concentration: Top4 index in the online advertising market and in total digital audience). Moreover, economic data are requested to assess media viability, on revenues and employment. The availability of these data 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. For these reasons, the evaluation of the lack of data in the Market Plurality area follows additional guidelines.

- a) Indicators on *plurality of media providers* and *plurality in digital markets*. When the questionnaire asks both for market and audience concentration, the following actions occur:
 - If country data on audiences are available, but those on revenue shares are not, or vice versa, the variable with a “No data” answer is given a “missing data” value, meaning that the findings are based exclusively 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 “very high risk”,

and the lack of audience share data as “missing data”. When the questionnaire only asks for audience or market concentration (variables on online media and on cross-media concentration), the lack of data is coded as high risk.

b) 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; or 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, and so on). Up until 2024, the decision was made to neutralise the lack of data in the case of the revenues of the digital segment, as we considered this to be a new segment that was in need of a new data collection practice. Starting with the MPM2025, however, the lack of revenue data for digital natives is coded as high risk.

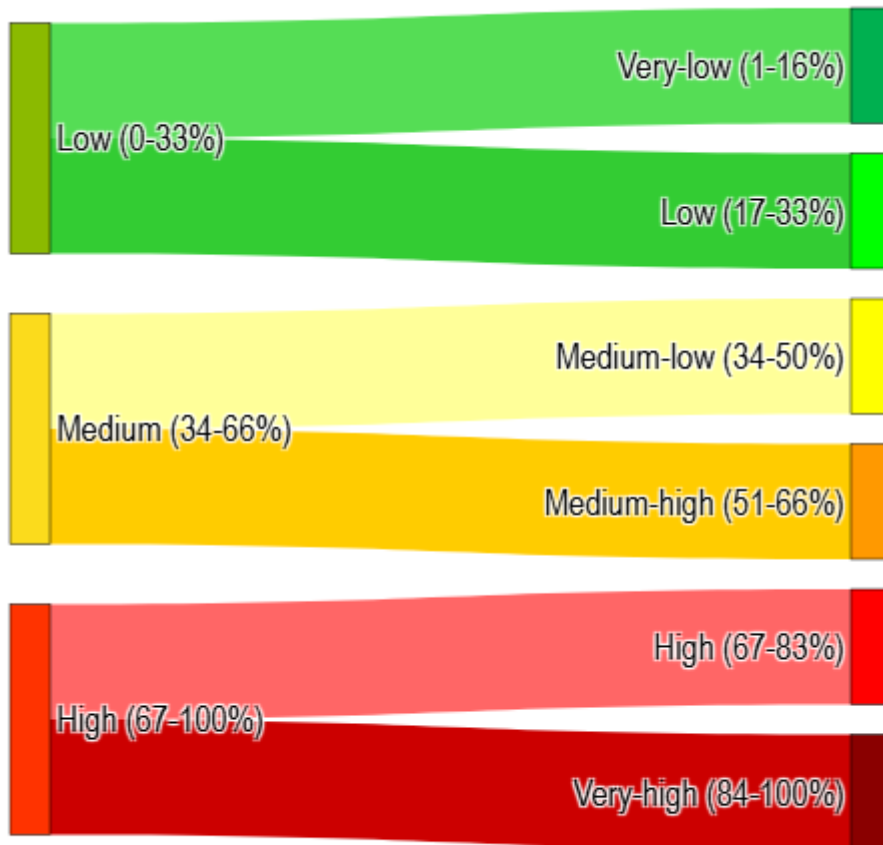
All “no data” assigned values have been double-coded by CMPF, meaning that two independent coders assigned one of the prescribed values to each “no data” answer. In cases where the coders disagreed, a discussion was held between those coders until a consensus on the final value was reached.

4 - MPM Aggregation Method

The calculation of the risk level per sub-indicators, indicators, areas and of the overall assessment relies on aggregation approaches to calculate indices that have been used in previous studies (for an overview, see Hanretty & Koop, 2012). However, the calculation also takes into account the logic of the Media Pluralism Monitor.

Risk assessment system. In previous editions of the MPM, risks to media pluralism were assessed according to a three-tier system: low (a rounded score from 0% to 33%), medium (a rounded score from 34% to 66%), and high risk (a rounded score from 67% to 100%). In 2025, the risk assessment was expanded from a three-tier to a six-tier system, as follows:

- Very low risk (rounded score comprised between 0 % and 16%) - represented in green in the data visualisation.
- Low risk (rounded score comprised between 17% and 33%) - represented in light green.
- Medium-low risk (rounded score comprised between 34 % and 50%) - represented in yellow.
- Medium-high risk (rounded score comprised between 51% and 66%) - represented in orange.
- High risk (rounded score comprised between 67% and 83%) - represented in red.
- Very high risk (rounded score comprised between 84% and 100%) - represented in bordeaux.



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Figure 1 - MPM2025 Six-tier system of evaluation of risk levels

The adoption of the six-tier system aimed to provide a more granular assessment of the risk to media pluralism and freedom. This increased granularity also aimed to shift the reporting from a percentage-based risk evaluation to a risk-band evaluation, which allows more comparability over the years, given the constant changes of the MPM questionnaire.

Calculation of the sub-indicator risk level. The risk level associated with a sub-indicator is calculated as follows :

$$R_{sub_ind_final} = \frac{\sum(\bar{R}_t \cdot \sqrt{n^t})}{\sum w_t}$$

- \bar{R}_t is the average risk score for variable type t ,
- n^t is the number of variables of type t ,
- $w_t = \sqrt{n^t}$ is the weight for variable type t .

In 2025, the formula has been modified to apply the square root of the number of variables per type within each sub-indicator. Given the fluctuating number of variables per sub-indicator, this step creates a more uniform weighting per variable, ensuring that variable types that are more numerous per sub-indicator are not under-weighted, and variable types that are less numerous are not over-weighted, while maintaining the L/S/E logic of the MPM.

The final risk score per sub-indicator is presented as a percentage score, e.g., a score of 0.46 is presented as a risk of 46%. 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 down to 0.46 or 46%.

Calculation of the indicator risk level. The risk level associated with indicators is calculated on the simple mean of the raw sub-indicator risk scores. The final risk scores per indicator are trimmed as follows: 1) a score of 0 is rated as 3%, and 2) a score of 100 is rated as 97%. The trimming of the extreme scores aims to avoid an assessment of a total absence or a total certainty of a given risk. This trimming of the extreme values was introduced as a methodological novelty in the MPM2016 (CMPF, 2017). As per sub-indicator, the final risk score per indicator is presented as a rounded percentage score.

Specificity of the Market Plurality area - Indicator *plurality of media providers*. This year, the formula used to calculate the risk score for the indicator *plurality of media providers* is slightly different to the formula used for other indicators. It includes an *ad hoc* weighing of some of the sub-indicators based on media consumption. This choice was made to ensure that media sectors with higher audience shares have a greater impact on the final score.

$$IR_PMP = \frac{\sum_{j=1}^4 ((4 \times C_j) \times W_j)}{\sum_{j=1}^4 W_j}$$

IR_PMP represents Indicator risk level for Plurality of media providers

j represents media sector

C represents media consumption

Four of the sub-indicators - namely '*horizontal concentration – AVMS*', '*horizontal concentration – radio*', '*horizontal concentration – newspapers*' and '*horizontal concentration – digital*' - were weighted according to media consumption trends in a given country, using data from the Flash Eurobarometer - Media & News Survey 2023. The two remaining sub-indicators - that is, '*media ownership concentration - regulatory safeguards*' and '*cross-media ownership concentration*' - have a default weight of 1.

Below is a step-by-step explanation of the formula applied for calculating the weighted risk scores for the aforementioned sub-indicators. As a first step, the percentage of media consumption for each of the four media sectors - AVMS, radio, newspapers, digital - are calculated and then multiplied by 4 (representing the number of media sectors). As a second step, the original sub-indicator score is then multiplied by its corresponding weight. As a third step, the weighted sub-indicator scores within the indicator are added up, along with the total weights. Finally, the total weighted sub-indicator scores are divided by the total weights, which produces the final weighted indicator score.

Calculation of the area risk level. The risk level associated with areas is calculated on the simple mean of the rounded and trimmed indicator risk scores.

Calculation of the overall assessment. The risk level associated with areas is calculated on the simple mean of the rounded area scores.

All the results are presented in the final report as rounded percentage scores.

Cross-data validation with Tableau. All the calculations made by the CMPF's *ad hoc* platform are replicated on the data visualisation software Tableau so that the risk scores calculated by the platform can be easily checked and verified.

5. Changes to the MPM 2025 Questionnaire

In the MPM2025, significant changes were implemented by the CMPF. This was to best align the questionnaire with the new set of regulatory instruments available at the EU level: from the European Media Freedom Act, to the Regulation on the Targeting and Transparency of Political Advertising. Further elements were also introduced based on the Digital Services Act and the anti- SLAPP Directive.

A description of the main differences, compared to the MPM2024 questionnaire, is given below.

- **Fundamental Protection**

Until MPM2024, the 5 indicators that made up the Fundamental Protection area were: 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. Since MPM2025, these are now: 1) Protection of freedom of expression; 2) Protection of information integrity; 3) Protection of the right to information; 4) Journalistic profession, standards and protection; and 5) Independence and effectiveness of the national regulatory authorities.

Indicator	Changes	Rationale
Protection of freedom of expression	Deletion of Var. 3 (MPM2024): "Has the State ratified the International Covenant on Civil and Political Rights (ICCPR) with no significant reservations/declarations?"	In the perspective of adding variables concerning emerging issues, such as the governance of content moderation by online platforms, and foreign information manipulation and interference, this variable was deleted. In the European context, the ratification of the ECHR (var.2) seems sufficient to scrutinize the respect of international standards.

	Deletion of var. 7 (MPM2024): “Is freedom of expression online clearly defined in law and/or in the case-law in accordance with international and regional human rights standards and are the restrictions to freedom of expression online 'proportionate' to the legitimate aim pursued?”	In a convergent and hybrid media environment, freedom of expression online and offline cannot be considered separately anymore.
	Deletion of var. 8 (MPM2024): “Are court decisions on damages proportionate to the offense of defamation? “	This circumstances are already considered under var. 10 (“Is your country free from SLAPP cases or any other vexatious lawsuits that ask a disproportionate amount for damages and primarily aim to harass and silence critics?”)
	The sub-indicator on “Positive obligations” (var. 8 - 10) has been moved in this indicator from the one on “Journalistic profession”.	Positive obligations to prevent journalists and other watchdogs from being subject to SLAPPs is a necessary precondition for the enjoyment of freedom of expression. References to the recently enacted EU anti-SLAPP Directive (2024/1069) have been inserted.
	The following variable has been moved from the sub-indicator on “Journalism and data protection” to the one on “Positive obligations”: var. 9 “Has your country implemented through national legislation the derogation provided for the GDPR on freedom of expression and journalistic activities in a way that complies with article 10(2) of the European Convention on Human Rights?”	The GDPR and privacy- related concerns are often the basis for SLAPPs: see for example https://www.tandfonline.com/doi/full/10.1080/17577632.2022.2129614 and https://www.the-case.eu/resources/how-slapps-increasingly-threaten-democracy-in-europe-new-case-report/
Protection of information integrity	<p>Addition of the new indicator, “Protection of information integrity”.</p> <p>It is composed of three sub-indicators:</p> <ul style="list-style-type: none"> • “Respect of freedom of expression online by platforms” (var. 11-13) • “Respect of freedom of 	Acknowledging the relevance for freedom of expression of issues stemming from an increasingly complex information environment. The enjoyment of freedom of expression and access to free and plural information requires the protection of information integrity (see its definition in the Glossary).

	<p>expression online by public authorities” (var. 14- 16)</p> <ul style="list-style-type: none"> • “Protection against disinformation and FIMI” (var. 17- 19) 	<p>It includes the assessment of content moderation practices by online platforms, the management of network traffic behind public authorities’ request, disinformation and foreign information manipulation and interference.</p>
	<p>Rephrasing of var. 8 and 10 (MPM2024- now var. 11 and 14) on content moderation by online platforms, on their own initiative (var. 11) or behind public authorities’ request (var. 14).</p> <p>The question now directly refers to the concept of content moderation as defined in art. 3 of the DSA.</p> <p>Both variables have been rephrased to refer more directly to the respect of freedom of expression as a standard to evaluate a risk in this field.</p>	<p>Updating the variables investigating the impact of content moderation online on freedom of expression, in light of the academic state of the art and the full entrance into force of the Digital Services Act (EU) 2022/2065).</p> <p>While the changes were necessary to adapt the variables to the new regulatory context, it is admittedly challenging to make full sense of the new DSA transparency reports and other disclosed data, as the methodologies to analyze them are still being developed. This is to say that a fine-tuning of these variables are expected in the years to come.</p>
	<p>Var. 15 is a new variable, asking about public authorities’ requests of network traffic management to ISPs and their adherence to freedom of expression.</p> <p>The word “State” in this variable as well as the variables scrutinising public authorities’ requests to moderate content has been substituted by the word “public authorities”.</p>	<p>Acknowledging the impact on freedom of expression and the right to access information of ISPs traffic blocks, restrictions, internet throttling and shutdowns and similar- beyond the issue of net neutrality as considered in the previous MPM editions in the “Universal access” indicator.</p>
	<p>Var. and 12 and 16 (var. 12 and 9 in MPM2024) ask about the transparency of content moderation practices and requests, substituting the evaluation of their “effectiveness” with that of the “meaningfulness” of such practices. By ‘meaningful’, we mean the extent to which platforms’ transparency reports are helpful in understanding the decision-making processes behind content moderation.</p>	<p>Acknowledging the entrance into force of the DSA, for EU member states, country teams can now consider the adherence to DSA’s transparency requirements (Arts. 14, 15, 21, 24) as indicated in the description of these variables.</p>

	<p>Variable 14 (11 in MPM2025) has been rephrased, from asking the presence of effective legal remedies to address violations of rights conducted by State or non-State actors in the online environment, to a more general possibility to access dispute resolution mechanisms to address violations of freedom of expression that resulted from content moderation practices.</p>	<p>This change reflects the full range of possible appeal mechanisms following content moderation actions.</p> <p>It positively acknowledges the existence of non-judicial dispute resolution mechanisms in the context of content moderation as provided for example by art. 20 and 21 DSA and for media services providers- by art. 18 (5) and (7) EMFA. They are out-of-court dispute settlements and mediation procedures.</p>
	<p>Addition of the new var. 19: “Are there policies and measures in your country to identify and address the threat of foreign information manipulation and interference?”</p>	<p>Acknowledging the emergence of the issue of FIMI, it is assessed how states deal with the threat in practice and how it is addressed in the policy discourse and relevant documents.</p>
	<p>Var. 17 and 18 (MPM2025) are rephrasing and merging var. 191, 194 and 197 (MPM2024), assessing the national strategies and cooperation among stakeholders to tackle disinformation; their impact on freedom of expression; the existence of independent initiatives to monitor and debunk disinformation.</p> <p>These issues used to be assessed in the Social Inclusiveness area, and were moved into this indicator for the MPM2025.</p>	<p>In light of the development of policy making related to disinformation and information manipulation online, the indicator on “Protection of information integrity” is best suited to assess actions taken to address disinformation-related issues.</p> <p>The activities of monitoring and debunking (including fact-checking and research) are to be considered jointly.</p> <p>An emphasis on the respect of freedom of expression and the independence from political and economic influences of the initiatives tackling disinformation has been added.</p>

Journalistic profession, standards and protection	Rephrasing of var. 23 on the role of journalists' professional association. A specific question on the presence of media councils to safeguard the respect of professional standards has been introduced in the Political Independence area (var. 111). Moreover, the effectiveness of media councils' action is part of the evaluation of v.112.	The "Editorial autonomy" indicator seems best fit to evaluate the respect for professional standards and the self-regulatory measures in place in that regard. It takes into consideration the EU Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector.
	Deletion of var. 25 (MPM2024): "Are the freelancers and self-employed journalists protected by social security schemes or other forms of financial support in case of unemployment, underemployment, a significant loss in revenues or illness?"	The working conditions of freelance journalists now are reported under var. 24, asking for working conditions of journalists in general. This allowed to make space for new variables related to emerging issues for media pluralism in the Fundamental Protection area.
	The sub-indicators on physical, digital and life safety of journalists do systematically require to refer to the data collected by the following projects: Mapping Media Freedom; the reports of the Media Freedom rapid Response Consortium (MFRR); the Council of Europe's Platform to promote the protection of journalism and safety of journalists.	Acknowledging the value of these sources, in line with Recital 74 EMFA (Regulation 2024/1083): "the monitoring exercise should take into account the findings of the Council of Europe Platform to promote the protection of journalism and safety of journalists and of the Media Freedom Rapid Response, given their effectiveness in identifying risks or threats to journalists and media service providers which can also affect the internal market for media services".
	Var. 27 and 31 assessing the physical and digital safety of women journalists also ask about the same threats and attacks against LGBTQ+ journalists.	Acknowledging the severity of threats faced by the LGBTQ+ community.
	Var. 38 on measures that prevent the illegal surveillance of journalists reworded based on the terminology used in art. 4 EMFA (e.g. intrusive surveillance technology, persons with regular or professional ties...). It has been specified that in carrying out this assessment, researchers should take	Acknowledging the provision of art. 4 EMFA. Expanding its scope beyond the ban for using such intrusive technologies only for public authorities, but recognizing that private subjects can play an important role in the field of surveillance against journalists and

	into account surveillance activities by private entities and state authorities, including the outsourcing of surveillance to private entities and quangos (quasi-autonomous non-governmental organizations). Inclusion in this assessment of the breaches of data retention obligations for Telecom Operators and ISPs.	other public watchdogs. Inclusion in the same variable of all possible shadows of surveillance against journalists.
	Deletion of var. 37 (MPM2024): “Does your country have a law that establishes data retention obligations for Electronic Telecommunications Operators and Internet Service Providers which complies with articles 8 and 10 of the European Convention on Human Rights?”. Inclusion of this assessment under var. 38 on the existence of measures preventing the illegal surveillance of journalists.	Inclusion in the same variable of all possible shadows of surveillance against journalists, making space for new variables related to emerging issues for media pluralism in the Fundamental Protection area.
	Deletion of the “Journalism and data protection” sub-indicator.	<p>The variables or issues contained in this indicator have been moved to other sub-indicators (Positive obligations, Protection of sources).</p> <p>This fine tuned the ratio behind a focus on data protection in the field of media freedom; moreover, decreasing the number of sub-indicators was needed for a more balanced weight of each of them under this indicator.</p>
Independence and effectiveness of the national regulatory authorities	The indicator’s name changed, it was earlier referring to “media authorities”. It now includes 3 new variables (41, 46, 50) related to the Digital Services Coordinators, namely national regulatory authorities entrusted by the Digital Services Act to implement the Regulation on a national level.	To assess the political and budgetary independence, accountability and effectiveness of the newly tasked Digital Services Coordinators. For non- EU countries, the same is valid referring to the competent authorities in the field of digital media services and of content moderation on online platforms.
	Deletion of var. 41 (MPM2024): “Are the appointment procedures for the media authority effective in limiting the risk of political and/or economic influence?”. The appointment procedures and their impact on the	To coherently assess all the relevant elements concerning the independence of NRAs, and making space for new variables related to emerging issues for media pluralism in the Fundamental Protection area.

	<p>independence of NRAs are now assessed under var. 40 and 41.</p> <p>Deletion of the sub-indicator on “Appointment procedures”, merged with the sub-indicator on “Independence”.</p>	
	<p>Merging the sub-indicators on “Competences” and “Accountability” under one sub-indicator called “Competences and accountability”.</p>	<p>Decreasing the number of sub-indicators for a more balanced weight of each of them under this indicator.</p>
<p>Deletion of the indicator “Universal reach of traditional media and access to the Internet”</p>	<p>Var. 57 (MPM2024) asking about ISPs traffic management has been splitted between the indicator on “Protection of information integrity” (referring to public authorities’ requests) and the Social Inclusiveness area (regarding commercial practices- net neutrality related).</p> <p>The issues assessed under the sub-indicators on “PSM coverage”, “Broadband coverage”, “Internet access”, and “Net neutrality” have been transferred to Social Inclusiveness area for MPM2025.</p> <p>Deletion of var. 55 (MPM2024): “What is the percentage of market shares of the TOP 4 ISPs in your country?”</p>	<p>Some of the issues assessed under this indicator are now assessed in the Social Inclusiveness area, focusing on universal and inclusive access to the media.</p>

- **Market Plurality**

The **Market Plurality** area presents the same structure for the MPM2024 as regards the indicators. The changes introduced in MPM2025 occurred at sub-indicator and variables level, and they are related to the need to take into account the EMFA regulation, and the impact of AI on the economic environment the media: 1) plurality of media providers: a new variable on the evaluation of media mergers, and restructuring of the sub-indicator on cross-media concentration; 2) plurality in digital markets: replacing of the sub-indicator on competition enforcement with a sub-

indicator on fair allocation of economic resource; 3) media viability: new sub-indicator on innovation.

Indicators	Changes	Rationale
Plurality of media providers	Addition of new variable 65: "Does the national law establish substantive and procedural rules, based on transparent, objective, proportionate and non-discriminatory criteria, to assess the impact of media market concentrations on media pluralism and editorial independence?"	Assessing the harmonisation of the national rules with the anti-concentration legal framework introduced with the EMFA. This variable asks about the existence of a separate assessment on mergers to evaluate the impact of the concentrations in the media market on media pluralism and editorial independence (the so-called "media plurality test", introduced by Article 22 EU Regulation (EU) 2024/1083 (European Media Freedom Act - EMFA).
	Restructuring the sub-indicator on regulatory safeguards (anti-concentration legal framework): the legal variables on horizontal concentration and the legal variables on cross media concentration are merged.	This change is due to the evolution of both the regulatory framework and the market structure. The European Union regulatory framework with the EMFA does not distinguish between horizontal and cross media concentration. Moreover, the separate legal assessment for each media sector appears obsolete in the convergent scenario of the digital environment. The assessment of economic variables (Top4 indexes) is still conducted for each sector (horizontal) and for the whole market (cross-media).
Plurality in digital markets	Deletion of the sub-indicator on competition enforcement. Since MPM202, this sub-indicator was designed to keep track of the evolution of the competition framework to address the challenges in the digital markets.	This change is due to the evolving EU regulatory framework. Under the Digital Markets Act (which has been in force from 2022 and became fully effective in 2024) competition rules and enforcement in the digital markets shifted mainly at the EU level.

	<p>Addition of a new sub-indicator, named “fair allocation of economic resources”, which includes the variables of the pre-existing sub-indicator on financial obligations of the platforms, and two new variables:</p> <p>78. “Are there in your country pro-competition initiatives aimed at balancing market power between publishers and online platforms?”</p> <p>80. “Are there financial agreements in your country, between Generative AI providers and media providers, to remunerate the right holders for the use of copyright-protected content?”</p>	<p>This sub-indicator deals with economic relationships between the media providers and the other players that are active in and impact on the media market. The scope of the sub-indicator has been enlarged to go beyond the financial obligations of the platform, and now refers to the broader concept of fair allocation of economic resources in the digital environment of the media - which is one of the objectives of the provisions of the EMFA. The sub-indicator now also addresses the issue of copyright protection in generative AI systems.</p>
Media viability	<p>The variable on local media revenue trends has been moved to the area of Social Inclusiveness.</p>	<p>As the Social Inclusiveness area includes an indicator on local media, it was considered more consistent to move the variable on economic sustainability of local media to this area (see below).</p>
	<p>Addition of a new sub-indicator on innovation, including the two pre-existing variables on innovation in business models and in newsrooms (which were included in the past MPM in the sub-indicator on Revenue trends).</p>	<p>This change is due to the need to assess and separately evidence the revenue trends of and the degree of innovation in the media sector.</p>
Editorial independence from commercial and owner influence	<p>The variable on the safeguards in case of appointment and dismissals of editors-in-chief was moved to the Political Independence area.</p>	<p>This change is due to the need to avoid duplications of assessments, regarding the guarantees against arbitrary appointments and dismissals of editors-in-chief (due to political or commercial/owners pressure).</p>

- **Political Independence**

The **political Independence area** has been subjected to relevant modifications, in particular, with regard to the indicators **editorial autonomy** and **audiovisual media, online platforms, and elections** – the latter has been renamed to **integrity of political information during elections**. This was necessary to best align the area with the EMFA framework (including Recommendations 2022/1634 on internal safeguards for editorial independence and ownership transparency) introduce certain elements from the Regulation on the Targeting and Transparency of Political Advertising, and to ensure a greater balance across indicators, sub indicators, and variables.

Indicator	Changes	Rationale
Political independence of the media	The definition of control, applying to the sub-indicator “political control over media outlets”, has been updated: control is to be understood as excessive ownership control (i.e. more than 10% of the shares of a given media company) by political actors in general, and the control enabling a dominant influence to be exercised in the ordinary shareholders' meeting. As in previous years, the variables in question aim to capture control that might be exerted through intermediaries, such as family members, friendly businesspeople (i.e. oligarchs), or other affiliates (i.e. lawyers).	This adjustment was necessary to better capture every possible source of control that might be exerted through ownership and/or management means.
	The definition of the risk coding options in variable 109 (formerly 121) has been updated.	This was to equalise the coding options related to the socio-political assessment on news agencies with the coding options of other sectors.
Editorial autonomy	The sub-indicator “appointment of editors-in-chief” has been renamed to: “appointments and dismissals of editors-in-chief”.	The adjustment was necessary so as to best reflect the scope of the sub-indicator, which also investigates potential relevant cases related to dismissals of editors-in-chief.
	Following the removal of variable 105 from the Market Plurality area, the assessment of the sub indicator “appointments and dismissals of editors-in-chief” now considers the risks coming from both political and commercial influences over appointments and dismissals of editors-in-chief.	This adjustment was necessary to avoid potential overlapping, or doubling of the data, between the Market Plurality and the Political Independence areas.
	The sub-indicator “effectiveness of self-regulation” has been reformulated (and expanded) into two new sub indicators:	On the one hand, this was necessary to improve the numerical balance of the

	<ul style="list-style-type: none"> - “External safeguards” (3 variables, 2 legal, 1 socio-political), focused on collective or cross-sectorial codes of ethics or bodies aimed at protecting editorial content from commercial or public interference <ul style="list-style-type: none"> - Are cross-sectorial codes of conduct stipulating editorial independence from political interference in the news media available? - Are there external bodies, such as media or press councils, overseeing self-regulation? - Are the main self-regulatory instruments effective in preventing political influence in practice? - “Internal safeguards” (3 variables, 2 legal, 1 socio-political), focused on media service providers’ internal codes of ethics and/or codes of conduct and bodies stipulating independence from political interference, and their effectiveness in practice. Questions include: <ul style="list-style-type: none"> - Do major media organizations have codes of ethics and/or codes of conduct stipulating independence from political interference, and are they implemented? - Are there internal bodies aimed at protecting the 	<p>variables across the different indicators that make up the area. On the other hand, the changes followed the recommendations on internal safeguards for editorial independence and ownership transparency in the media sector attached to the EMFA, so as to better capture both the availability, the quality, and the effectiveness of several self-regulatory mechanisms.</p>
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	<p>independence of editorial content?</p> <ul style="list-style-type: none"> - Are internal safeguards effective in preventing political influence? 	
Audiovisual media, online platforms and elections	The indicator “audiovisual media, online platforms and elections” has been renamed to “integrity of political information during elections”. It now counts 13 variables, against the 17 variables of the previous MPM.	The indicator is now focused on the electoral period only.
	Three variables from the sub-indicator “PSM bias” related to the non-electoral period have been moved to the indicator “independence of public service media”. As such, the sub-indicator has been renamed to “PSM bias in the electoral period”.	The indicator is now focused on the electoral period only.
	The sub-indicator “commercial audiovisual media bias” has been renamed to “private audiovisual media in the electoral period”.	This terminological adjustment was made in order to best reflect the scope of the sub-indicator, which was already focused on the electoral period only.
	The sub-indicator “rules on political advertising in audiovisual media” has been renamed to “rules on political advertising in the media”.	This was because the legal assessment on political advertising on online media (v.136) was included in the sub-indicator in question. As such, the scope of the sub indicator is no longer only related to audiovisual media, but now embeds the distribution of political advertising in the media in general, including the online dimension.
	The variable “is there a regulation that aims to ensure equal opportunities and transparency of political advertising in online media during electoral campaign?” has been removed.	Same as above, the assessment has been integrated in the sub-indicator “rules on political advertising in the media”.

	The sub-indicator “rules on political advertising online” has been renamed to “rules on political advertising on online platforms”.	Following the removal of the variable on political advertising in online media, the sub-indicator now investigates the reality behind political advertising in online platforms only.
	The following variable has been added to the indicator “rules on political advertising in the media”: “have the providers of political advertising services respected the ban on the provision of advertising services to third country sponsors three months before an election or referendum?”	This was based on some of the requirements of the recently adopted EMFA regulation on the targeting and transparency of political advertising (art. 5 (2)).
	Two new socio-political variables were added to the sub-indicator “distribution of state advertising”: “Is state advertising distributed to online platforms in a fair and transparent manner?”; and “do the competent National Regulatory Authority take account, monitor, and report annually on the allocation of state advertising expenditure to media service providers and to providers of online platforms, and are the reports made publicly available?”	This was based on the requirements of Art. 25 EMFA.
Independence of public service media	The methodological descriptions of some variables under this indicator have been adjusted.	This was to detail in the variables’ methodology the requirements provided by EMFA Art.5.
	A new sub-indicator, “plurality of PSM coverage”, was added. This is made up of the three PSM variables on the non-electoral period that have been moved from the former indicator “audiovisual media, online platforms and elections”.	This change concentrates most of the PSM-related variables under the dedicated indicator. It also entailed the creation of an ad-hoc sub-indicator to investigate proportional and unbiased representation of political actors and viewpoints in the non-electoral period in PSM.
	The variable in the sub-indicator “PSM governance”, asking about the	This was to better capture the extent of political control all

	independence of the PSM editorial line, has been modified.	the way up to the level of editors-in-chief.
	Two variables from the sub-indicator “PSM funding” have been removed.	Their assessment has been integrated into the remaining legal question.

- **Social Inclusiveness**

The **Social Inclusiveness** area for the MPM 2025 includes a new indicator on *universal and inclusive access to media*. This indicator focuses on infrastructures to guarantee inclusive access to media throughout national territories and for people with disabilities. The indicator on *protection against disinformation* has, however, been transferred to the **Fundamental Protection** area. The indicator on *representation of minorities in the media* has been fully reorganised.

Indicator	Changes	Rationale
Universal and inclusive access to media	The indicator on “universal access to the media” that was previously part of the Fundamental Protection area has been transferred to the Social Inclusiveness area and has been transformed to include a focus on geographical inclusivity and media accessibility	As an essential component of geographic inclusivity, universal access is part of the Social Inclusiveness area.
	A variable on the appropriate prominence of the content of public interest produced by PSM has been added.	This is in line with Article 7a of the revised Audiovisual Media Service Directive (AVMSD) 2018/1808/EU.
	Two variables assessing the regional homogeneity of download speed of fixed-broadband and of mobile-	This variable aims to understand geographical inclusivity in terms of broadband coverage as a key to social inclusiveness.

	broadband through the national territory were added.	
	The sub-indicator “media accessibility for people with disabilities” has been transferred to this indicator.	The sub-indicator on “media accessibility for people with disabilities” has been included in this indicator as media accessibility is essential to guarantee a universal and inclusive access to the media.
Representation of minorities in the media	Reorganisation of the indicator into three sub-indicators: “representation of legally-recognized minorities in media content”, “representation of marginalised communities in media content”, “protection against hate speech”.	Instead of focusing on internal and external pluralism, the sub-indicators focus on types of minorities and the specific problems they may face. The sub-indicator on “protection against hate speech” has been included in this indicator following the disappearance of the indicator on “protection against disinformation and hate speech”.
	The notion of “non-legally recognised minority” has been replaced by the notion of “marginalised community”.	The notion of marginalised community is larger and also allow us to take into account communities such as the LGBT community. It also made more sense to speak about marginalised communities in line with the notion of hate speech as not only minorities are victims of hate speech.
	Inclusion of a variable on VLOPs’ actions to fight against hate speech.	This is in line with the disposition contained in Art. 34 of the DSA.
Local, regional and community media	Inclusion of a variable on the sustainability and viability of local media, previously in the Market Plurality area (var. 176).	The sub-indicator now provides a more complete overview of local and regional media.
	Creation of a new sub-indicator to measure PSM and local coverage, including a new variable on the recording of local	It allows us to distinguish the local media offer from private media companies and from PSM.

	programmes by PSM (var. 178).	
	Reshaping of the indicator on “community media” with four variables. These focus on: 1. the legal recognition of community media (var. 179); 2. legal provisions to guarantee their access to frequencies (var. 180); 3. subsidies (var. 181); and 4. the offer of community media in practice (var. 182).	This redistribution provides a more complete overview of community media.
Gender equality in the media	Creation of a new sub-indicator named “editors-in-chief and gender equality” composed of two variables. This sub-indicator is composed of two variables which assess the gender equality among editors-in-chief in leading news media (existing variable) (Var. 198) and in local media (new variable) (Var. 199).	The issue of gender equality in local media is often overlooked in academic research.
Media literacy	Redistribution of the variables into four sub-indicators: “media literacy governance framework”, “media literacy in the compulsory curriculum”, “lifelong media literacy activities”, and “media literacy skills”.	This change creates a better balance between sub-indicators. It also distinguishes between - media literacy activities included in the compulsory curriculum and lifelong activities.
	Addition of a variable regarding resources allocated to media literacy programmes in the sub-indicator “media literacy governance framework” (see var. 193).	Based on the new media literacy toolbox developed by the European institutions, resources are essential to media literacy policies.

	<p>Addition of a variable linked to the action of VSPs and AVMS in terms of media literacy included in the sub-indicator “lifelong media literacy activities” (see var. 198).</p>	<p>This variable is in line with article 28b of the audiovisual media services directive.</p>
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