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#MediaFreedomReport2025



Liberties

Media Freedom Report

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Executive summary

About this report

The Media Freedom Report 2025 is the fourth annual report on media freedom in the European Union (EU) produced by the Civil Liberties Union for Europe (Liberties). It is based on input from organisations in the Liberties network and complements our annual Rule of Law Report.

The data and information provided herein comes from our own research and from our member and partner organisations through their rule of law country reports – in-depth reports on the current state of the rule of law, as seen by experts working on the ground in Member States. These reports follow a common approach and structure developed by taking account of the priority areas and indicators identified by Liberties. Because of their invaluable contributions, the information we have is sufficiently representative to give an accurate indication of the current state and trajectory for media freedom and pluralism in the EU.

The Media Freedom Report discusses relevant legislative and regulatory action at EU and national level during 2024 and maps the main trends and developments in media freedom in 21 EU Member States, namely: Belgium, Bulgaria, Croatia, Czech Republic, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, the Netherlands, Poland, Romania, Slovakia, Slovenia, Spain and Sweden. This report also sets forth a

list of recommendations to the EU institutions to improve the media landscape in Europe and better protect media freedom and pluralism across the Union.

As in previous editions, this report covers three primary areas: media freedom and pluralism, safety and protection of journalists, and freedom of expression and information. Additionally, this year's report features a chapter dedicated to discussion on legislative and policy-related events that occurred (or began) in 2024 and triggered still-evolving changes in European media markets, such as the entry into force of the European Media Freedom Act, the adoption of the EU Anti-SLAPP Directive and negotiations around the EU's next Multiannual Financial Framework (MFF), covering 2028-2034.

A free and pluralistic media ecosystem is necessary for strong and stable democracy, and efforts by governments to weaken the rule of law and democratic institutions almost always start by seeking to control their country's media landscape. This report serves as a monitoring exercise to lay bare ongoing threats across the bloc and help prevent further violations of media freedom and pluralism, and the rights to freedom of expression and access to information. The findings of this report should put EU officials on high alert: media freedom and pluralism are under attack across the EU, and in some cases they are in an existential battle against overtly undemocratic governments.

Moreover, developments in 2024 indicate that in these darkest corners, EU legislation to bolster media freedom is being greeted with hostility, making enforcement efforts in 2025 and beyond decisive in protecting the free and plural media that European democracy depends on.

Context

Last year brought multiple developments that have the potential to significantly reshape media freedom and pluralism across Europe. At EU level, two critical legislative efforts passed into law in 2024, namely the European Media Freedom Act (EMFA)¹ and the Anti-SLAPP Directive.² The EMFA aims to improve and better protect media freedom and pluralism by addressing several long-standing threats, including protection of journalists, lack of transparency over media ownership and state advertising, and the crumbling independence of public service media and national media regulatory bodies. The EMFA establishes a new body, the European Board of Media Services (the Board), which will ensure consistency in applying media laws and provide stronger oversight of national enforcement, including the level of protection afforded to journalists and media workers. The

Anti-SLAPP Directive also addresses this last issue by providing some relief for victims of SLAPP cases – lawsuits that the wealthy and powerful use as weapons to silence independent journalists and media outlets.

The results of recent elections also impact Europe’s media landscape. 2024 marked the first full year of new governments in Slovakia and Poland, pulling their respective media ecosystems in opposite directions. Elections to the European Parliament, held from 6 to 9 June 2024, resulted in a decided shift to the political right, which may have implications for future legislative efforts and, more immediately, negotiations on the Multiannual Financial Framework (MFF), the EU’s long-term budget. Negotiations begin in earnest in 2025 to decide the bloc’s 2028-2034 budget. The funding decisions made during these negotiations will have significant implications for media freedom, as discussed in this report.

Ongoing armed conflicts at the EU’s borders are also indirectly impacting media freedom and pluralism within the bloc. Civil society organisations in several Member States reported threats and harassment against dissident Russian journalists reporting from their countries. The use of spyware against EU-based Russian and Belarusian journalists

1 Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act), <https://eur-lex.europa.eu/eli/reg/2024/1083/oj/eng>.

2 Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (‘Strategic lawsuits against public participation’), <https://eur-lex.europa.eu/eli/dir/2024/1069/oj/eng>.

was also evident throughout last year. These events raise concerns not only over journalists' safety, but also over the possible chilling effect it could have on their work, in particular because reliable, fact-based reporting in the Russian language is an important source of information for many people living in Latvia, Lithuania and other countries along Russia's border. In multiple Member States, incidents of violence against journalists covering protests related to the Israel-Palestinian conflict were also reported in 2024.

Key findings

The European Union's media landscape remains pockmarked with Member States whose governments attack media freedom and weaken the independence of media outlets and market regulatory bodies. Overall, the EU's media markets feature high media ownership concentration, with these owners remaining obscured behind inadequate ownership transparency obligations, the continued erosion of public service media's independence, ongoing threats and intimidation against journalists, and restrictions on freedom of expression and access to information.

These findings are consistent with last year's report³ and are particularly troubling in light of the European Media Freedom Act, almost all of which comes fully into force in August 2025. While some Member States had made

efforts to prepare for this binding legislation by the close of 2024, many others had not – and, in the worst cases, appeared to flout it. This legislation is designed to address many of the critical threats to media freedom covered in this report, such as the inadequate protection of journalists and their sources, the lack of independence of national regulatory bodies (the law creates an EU-level oversight body to strengthen enforcement), and the lack of transparency over both media ownership and state advertising allocation to public service media. Unfortunately, as of the end of last year, many Member States seem unready – if not unwilling – to fully and faithfully enforce the EMFA. While there were multiple positive developments noted last year, the trends observed in this report do not markedly diverge from previous years' findings, confirming the continuation of long-standing trends and, hopefully, putting the EU on high alert as it prepares to monitor enforcement of the EMFA.

Media freedom and pluralism

Media ownership concentration is high in **Croatia, France, Hungary, Malta, the Netherlands, Slovenia, Spain** and **Sweden**. In most cases, large segments of the media sector are controlled by wealthy individuals or families, often through other companies. In Malta, political parties control a network of media outlets. Significant ownership concentration limits the diversity of media voices

3 Jonathan Day, Franzika Otto and Eva Simon, *Media Freedom Report 2024*, Civil Liberties Union for Europe, <https://www.liberties.eu/f/flccsm>

and increases the risk that reporting will not be unbiased.

Media ownership transparency continues to face challenges in **Croatia**, the **Czech Republic**, **Hungary**, **Italy**, **Malta** and the **Netherlands**. In many cases, like the Netherlands, much of the existing media regulations align with and support the EMFA but do not include a publicly accessible, regularly updated database of beneficial media owners, as required by the law.

The use of state advertising funds remains problematic – often either because of a lack of transparency over its allocation or the clear use of these funds to support only government-friendly media – in **Bulgaria**, **Croatia**, **Greece**, **Hungary**, **Malta**, **Slovenia** and **Spain**. Both the **Czech Republic** and the **Netherlands** made steps in 2024 to improve shortcomings in this area.

Challenges to the independence or functioning of the public service media (PSM) sectors exist in **Bulgaria**, **Croatia**, **France**, **Greece**, **Italy**, **Malta**, **Romania**, **Slovakia**, and **Spain**. In **Hungary**, PSM remained a fully captured propaganda system for the government in 2024. In the **Czech Republic** and **Ireland**, continued uncertainty about PSM's future funding weighs heavily on journalists' work. Last year, efforts began in **Germany** to reshape PSM, which may have the ultimate effect of reducing the overall number of outlets available to the public, in particular at local and regional levels. A positive trend is emerging in **Slovenia**, where the de-politicisation of the governing model of RTV Slovenia, introduced in 2022 by

the current government, now allows the public broadcaster's governing body to function free from influence.

Many countries feature independent media regulatory bodies, but there are conspicuous threats to these bodies in **Bulgaria**, **Croatia**, **Greece**, **Hungary**, and **Malta**. In **Slovakia**, 2024 saw little evidence that the Fico government had brought the national regulatory authority under its control, but there is every reason to believe this will happen in 2025. In **Poland**, a plan to reform the National Broadcasting Council appears insufficient to address all the challenges that restrict the body's independence and operations. In **Germany**, developments in 2024 have given rise to concerns that the national regulator of telecommunications will soon face severe resource challenges.

Levels of public trust in the media remain low, in particular in **Bulgaria**, **Croatia**, the **Czech Republic**, **Greece**, **Hungary**, **Malta**, **Slovakia** and **Spain**. Interestingly, a 2024 survey found dropping trust levels in the media in **Hungary** even among voters who support the ruling Fidesz party. Levels of trust in the media are comparatively high in **Estonia**, **France**, and **Germany**.

Safety and protection of journalists

Journalists must work in an environment where they are safe and free from the influence of politicians, businesspeople or anyone else who could compromise the impartiality and factuality of their reporting. Only in such an environment is the right to freedom

of expression, including freedom of the media, truly protected, and people are able to access accurate, important information on issues that affect their lives. This report, however, finds the continuation of grave threats to journalists across Europe — intimidation, lawsuits, surveillance, attacks and detention are all everyday threats.

In 2024, verbal attacks against journalists were recorded in **Croatia**, the **Czech Republic**, **Greece**, **Ireland**, **Italy**, **Malta**, **Romania**, **Slovakia**, **Slovenia** and **Sweden**. These attacks often occurred online or during protests, and often-times came from politicians or their supporters.

Acts of physical violence, often at protests and other public demonstrations, were observed last year in **Croatia**, **Germany**, **Greece**, **Italy**, **Slovakia**, and **Slovenia**. In **France**, **Germany**, **Greece**, **Hungary** and **Spain**, instances of violence against journalists were caused by the police.

Multiple countries continue to do too little to provide legal protections for journalists, and some even weaken the protections that do exist. Experts in **Bulgaria** note the country's continued lack of a system to report violence against journalists, while in **Spain** the police lack training and resources to deal with such threats. The government of **Slovakia**, where investigative journalist Jan Kuciak was murdered in 2018, last year significantly reduced penalties and the statute of limitations for serious crimes and abolished the Special Prosecutor's Office.

Strategic lawsuits against public participation, or SLAPPs, remain a problem in Member States across the EU, including **Belgium**,

Bulgaria, **Croatia**, **France**, **Germany**, **Greece**, **Hungary**, **Italy**, **Lithuania**, the **Netherlands**, **Slovakia** and **Slovenia**. In Slovakia, the Prime Minister himself was an instigator of one SLAPP case against a journalist.

A disproportionate share of harassment and threats against women journalists in 2024 were observed in **Bulgaria**, **Italy**, **Slovakia** and **Sweden**.

Freedom of expression and information

Freedom of expression and access to information are not fully guaranteed to journalists in all Member States. This is especially true of independent journalists and those from outlets that are critical of the government. The torrent of hate speech that has targeted journalists in recent years continues, in particular on social media.

Hate speech against journalists remains a serious issue in **Croatia**, **Germany**, and **Slovenia**, while **Slovenia** took steps to sanction media outlets that themselves work to spread hate speech and other similar offenses.

Journalists in **Bulgaria**, **Germany**, **Greece**, **Malta**, the **Netherlands** and **Spain** reported resistance or refusal when making freedom of information requests to public officials.

In **Bulgaria**, the **Czech Republic**, **Hungary**, **Romania**, **Slovakia** and **Spain**, efforts to combat disinformation are falling short, especially in the digital space.

Recommendations to the institutions of the European Union

The European Union is reaching the enforcement stage for key media-related laws. It is now essential that the EU and its advisory bodies for these laws work diligently and in coordination, both with each other and with civil society organisations and other stakeholders, to urgently address threats to media freedom and pluralism. National legislators and authorities play a crucial role in ensuring media freedom and pluralism through their regulations and enforcement. This includes safeguarding the financial and political independence of regulatory authorities and the public service media, fair and transparent state aid and state advertising rules, enforcing the ban on using spyware on media workers and their sources or the implementation and further protection against SLAPPs.

Media freedom and pluralism

- Closely monitor the transposition and enforcement of the EMFA and the Anti-SLAPP Directive and ensure they are properly enforced in the Member States, and incentivise Member States to extend SLAPP protections to cover purely domestic cases. This should be backed by the initiation of infringement procedures against Member States that violate European media laws following their entry into force, particularly with respect to the EMFA from 8 August 2025.
- The European Board for Media Services (the Board) should create a standardised consultation process and regularly consult with journalists' associations and civil society organisations together with other stakeholders, including Very Large Online Platforms, to address the systemic challenges faced by media markets within the EU.
- The Board should collaborate with the European Board for Digital Services in accordance with Article 18 of the EMFA. These two boards should align their strategies on the role of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) in relation to media consumption and journalism, the European media market, the safety of journalists and the internal advertising market, and explore sustainable financing solutions for journalists and European media outlets, including public service media.
- Media ownership concentration, including media plurality and diversity online, is unique in different EU member states. To address this issue at the national level, the Commission, in collaboration with the Board, should provide guidance on standardised measurement methodologies and facilitate the sharing of best practices. Part of this is supporting an EU-wide database

on media beneficial ownership that integrates and builds on national databases.

Safety and protection of journalists

- Ensure effective protection against surveillance systems, such as spyware, used against media workers and their sources.
- Monitor and report on the implementation of the EU Recommendation on the Safety of Journalists and related EU legislation, the Whistleblowing Directive, in consultation with civil society and media representatives.

Freedom of expression and censorship

- Align the efforts of Digital Services Act enforcement to ensure that access to information and freedom of the media prevail on Very Large Online Platforms and Very Large Online Search Engines.
- Move forward with a more extensive protection against hate speech in line with the Communication of the European Commission,⁴ extending the current list of ‘EU crimes’ in Article 83(1) TFEU to hate crimes and hate speech. Ensure a balance with freedom of expressing during the process.

Multiannual Financial Framework (2028-2034)

- The EU should fund, directly and independently from Member States, media and other civil society organisations that are essential for media freedom and pluralism, freedom of expression and in the functioning of democracy. Such funding should be available for independent media outlets, civil society organisations, watchdogs, human rights litigators and awareness-raising projects.
- Secure sustainable media by redistributing economic power between news outlets and the VLOPs—this should include compensation for journalistic content and address the imbalance in the advertising market.
- Fund and provide ongoing support for digital literacy training.
- Properly fund initiatives, such as the Citizens, Equality, Rights and Values Programme (CERV), with a special focus on protecting and promoting freedom of expression, access to information, media freedom and pluralism. Fund the European Digital Media Observatory (EDMO) to counter disinformation, the European Fact-Checking Standards Network (EFCSN), the Media Freedom Rapid

4 COM(2021) 777 final, Communication from the Commission to the European Parliament and the Council, a more inclusive and protective Europe: extending the list of EU crimes to hate speech and hate crime, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0777>

Response (MFRR),⁵ a Europe-wide mechanism that tracks, monitors and reacts to press and media freedom violations in EU Member States and candidate countries.

- Support the enforcement of the Commission's Recommendation of the Safety of Journalists across Member States.

5 Media Freedoms Rapid Response, *Supporting and protecting journalists and media works in EU Member States and candidate countries*, MFRR, <https://www.mfrr.eu/>

Media freedom and pluralism

Key findings

- Media ownership is heavily concentrated in many EU Member States and largely unchanged from findings of previous reports. This is true even in countries with traditionally free media markets, restricting pluralism and a diversity of views in media markets across the bloc.
- Media ownership transparency is still grossly inadequate, and databases of beneficial media owners are either non-existent or suffer from irregular updates or gaps in information. The EMFA addresses this issue, but strong enforcement will be necessary, and the Commission should go further by developing an EU-wide database building on the mandatory national databases.
- Public service media struggle for independence and financial stability. Governments still influence leadership appointments, financing frameworks and, in some cases, editorial decisions.
- Many governments continue to influence the leadership and oversight boards of national media regulatory bodies, despite the fact that these bodies must remain independent in order to impartially enforce media regulations.

- In another continuing trend, public trust in the media remains low across the EU.

Media ownership concentration

Europe's national media markets remain highly concentrated, a trend observed in each of the three preceding editions of this report. A large number of media outlets are controlled by a few ultra-wealthy individuals or families, or even by public officials. This ownership concentration results in a media environment that is less diverse, restricting the rich tapestry of information, sources and opinions the public is able to access.

In **Croatia**, the Croatian Chamber of Economy (HGK) is responsible for monitoring media ownership concentration and tracking ownership structures for print and print distribution companies; the Council for Electronic Media (VEM) monitors electronic media. If there is cross-media concentration, companies must also report to the Agency for Market Competition Protection (AZTN). Despite this shared and layered approach, serious threats to media pluralism persist. The Media Pluralism Monitor puts the country's media pluralism in its 'high risk' category due to unclear rules regulating electronic media concentration and the existing heavy concentration of media ownership. According to the latest available

data presented in the Monitor (2022), the four largest audio-visual media owners in the country accounted for 97% of the market (with a viewership concentration of 82%), while the market share of the four largest owners of radio media was 69% (with a listenership concentration of 35%).⁶

One development that occurred last year in the **Czech Republic** significantly weakened the government's attempt to improve media plurality. In 2023, the government took legislative action against media ownership concentration by passing the 'Lex Babiš II' amendment to existing legislation on conflicts of interest. The amendment, which took its nickname from former Prime Minister Andrej Babiš, who owned an extensive media empire, prevented politicians from owning media outlets. In December 2024, the Constitutional Court ruled that significant parts of the amendment were unconstitutional. The Court determined that the law included provisions introduced as an unconstitutional rider, meaning they were added during the legislative process without proper discussion or relevance to the original law. Consequently, the Court annulled these provisions, weakening the amendment's scope and impact on media ownership regulations.

The ruling reignited debates about legislative practices and media independence in the Czech Republic.⁷

The media market in **France** also faces significant challenges to media pluralism. At the end of 2023, billionaire Vincent Bolloré acquired the Hachette group, which includes the major publishing houses Armand Colin, Fayard, Grasset and Stock, as well as school and children's publishing.⁸ In 2024, Bolloré reshuffled the group's staff, installing media personalities who shared his conservative political views at the head of several publishing houses. Following the takeover of Hachette, Bolloré had to sell Editis, which is now owned by billionaire Daniel Kretinsky. Editis is considered France's second-largest publishing group, just behind Hachette.

Last year, a parliamentary investigatory committee composed of 30 deputies examined the allocation, content and control of authorisations for national television services on digital terrestrial television (TNT). The committee examined the means of control implemented by Arcom, the country's media regulatory authority, to ensure pluralism and concluded that "...the regulator does not appear to be in a

6 Paško Bilić; Antonija Petričušić, *Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European member states and in candidate countries in 2023. Country report: Croatia*, Centre for Media Pluralism and Media Freedom (CMPF), 2024, <https://cadmus.eui.eu/handle/1814/76996>

7 Czech Radio, *The Constitutional Court Overturned Significant Parts of Lex Babiš II as an Unconstitutional Add-On (Ústavní soud zrušil podstatné části Lex Babiš II jako neústavní přílepek)*, iRozhlas.cz, 10 December 2024, https://www.irozhlas.cz/zpravy-domov/lex-babis-ii-zakon-verdikt-rozhodnuti-ustavni-soud_2412100914_hof

8 Nieman Reports, *The Fox News of France*, 20 January 2024, <https://niemanreports.org/the-fox-news-of-france-bolloré-cnews/>

position either to enforce the obligations applicable to channels, or to guarantee the pluralism of expression of all the currents of thought and opinion in French society, necessary for the proper conduct of democratic debate.”⁹

Concerns over media pluralism are rising in **Germany**, where the local newspaper landscape is being squeezed by increasing digitalisation and dropping readership. This is causing a decline in diversity, particularly in rural areas, posing a growing threat to press freedom.¹⁰ For example, the Funke media group stopped delivering the *Ostthüringer Zeitung* to 300 subscribers in the Greiz district of Thuringia, citing the fact that high costs, including rising wages, made distribution unprofitable. Such developments will likely continue and affect more and more rural areas across Germany.

Many local editorial offices are being closed or merged due to rising costs and declining sales and advertising revenue. A 2022 study commissioned by the government revealed that

nearly half of newspaper publishers reduced their editorial staff between 2017 and 2022, and 62% expected further reductions.¹¹ The study also found an increase in cross-publisher cooperation and article reuse, which diminishes content diversity, especially at local and regional levels. The study warns of the slow but steady decay of local journalism, which leads to less democratic participation in local politics.

The number of media outlets in **Greece** is large, so much so that the overall landscape appears fairly diverse. Despite this appearance, however, it remains the case that the ownership of the country’s major media groups is concentrated among a handful of influential business owners with interests also in other sectors of the economy. Indeed, private media ownership is characterised by a small number of wealthy and politically connected families with extensive cross-ownership interests in key sectors, often reliant on public contracts from the government. The dominant force of media ownership in Greece is now composed

9 Commission of Inquiry into the Allocation, Content and Control of Authorisations for National Television Services on Digital Terrestrial Television (France) (Commission d’enquête sur l’attribution, le contenu et le contrôle des autorisations de services de télévision à caractère national sur la télévision numérique terrestre), *Report on the allocation, content and control of authorizations for national television services on digital terrestrial television* (Rapport sur l’attribution, le contenu et le contrôle des autorisations de services de télévision à caractère national sur la télévision numérique terrestre), No. 2610, 7 May 2024, https://www.assemblee-nationale.fr/dyn/16/rapports/cetnt/116b2610_rapport-enquete

10 Reporters Without Borders (Germany), *Close-Up 2024 Germany (Nahaufnahme 2024 Deutschland)*, 25 March 2024, https://www.reporter-ohne-grenzen.de/fileadmin/Redaktion/Downloads/RSF_Nahaufnahme_Deutschland_2024.pdf

11 DIW ECON, *The situation of the local press in Germany and its challenges in the age of digitalisation* (Die Situation der lokalen Presse in Deutschland und ihre Herausforderungen im Zeitalter der Digitalisierung), 8 September 2022, <https://kulturstaatsministerin.de/gutachten-zur-situation-der-lokalpresse>

of shipowners and major investors in the industry.¹² Independent media group Solomon recently published its investigation ‘Who Owns the Media’.¹³ It reveals the intricate ownership structures behind Greek media, linking 762 companies to 12 major owners, many of whom are involved in other sectors of the economy, like shipping, finance, and energy, and maintain ties to tax havens. These owners wield media as a tool of influence.¹⁴

Media ownership remains highly concentrated in **Hungary**, which is all the more troubling because media owners are almost uniformly allied with the government. When Prime Minister Viktor Orbán returned to power in 2010, oligarchs close to him began buying up the country’s largest media outlets, while the government revised tax laws and other regulations to pressure the country’s remaining independent outlets. Then, in 2018, these oligarchs ‘donated’ their holdings to a single entity, the Central European Press and Media Foundation (KESMA), with one independent investigation finding KESMA came into control of some 500 media companies almost overnight.¹⁵ Since 2018, KESMA has functioned as a

centralised, pro-government media conglomerate that relies heavily on state advertisements for its funding.

Because Hungarian media regulations do not impose restrictions on media company ownership, large media conglomerates can emerge – outside of KESMA, but nevertheless just as friendly to the government. From a competition law perspective, the Hungarian Competition Authority (HCA) maintains the authority to approve or prohibit mergers, including those involving media companies. However, the HCA must obtain – and is then bound by – a position statement from the Media Council. Since the Media Council approves mergers without thoroughly reviewing their potential impact on media plurality, the HCA’s ability to supervise media-related mergers is essentially non-existent, resulting in an “unparalleled consolidation of media ownership”.¹⁶

Most recently, in a September 2024 speech, Prime Minister Orbán expressed dissatisfaction with pro-government media and influencers. Shortly after the speech, news reports began appearing about a plan for restructuring

12 International Press Institute, *Media Capture in Greece: Entanglement of the fourth estate*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report.pdf>

13 Solomon, *Who Owns the Media Project*, <https://whoownsthemedia.gr/>

14 International Press Institute, *Who owns Greece’s media? Inside Solomon’s investigation*, 15 October 2024, <https://ipi.media/greece-media-ownership-solomon-investigation/>

15 Bátorfy Attila, *Infographic: This is what the ownership structure of pro-government media looks like from today (Infografika: mától így néz ki a kormánypárti média tulajdonosi szerkezete)*, *Atlatszo*, 28 November 2018, <https://atlatszo.hu/adat/2018/11/28/infografika-matol-igy-nez-ki-a-kormanyparti-media-tulajdonosi-szerkezete/>

16 International Press Institute, *Media Capture Monitoring Report: Hungary*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Hungary-Media-Capture-Monitoring-Report-Final-1.pdf>

Mediaworks, Hungary's largest publisher under KESMA, by decentralising it for better manageability, thus executing ownership changes – although spun-off parts of the company appear intended to be placed under the authority of government-linked individuals. These changes further highlight the government's influence over major media publishers and the decline of media pluralism.¹⁷

Recent developments in **Italy** have raised questions about the pluralism of the country's media market. In September 2023, rumours began about the potential acquisition of Agenzia Giornalistica Italia (AGI), one of Italy's largest news agencies, by the Angelucci Group, headed by Antonio Angelucci – a Lega MP and media mogul who already owns several large newspapers, including *Il Giornale*, *Libero*, and *Il Tempo*. This sparked immediate concerns over media concentration, political influence, and conflicts of interest.¹⁸

AGI's editorial staff warned that it would undermine the outlet's independence and impartiality. They staged multiple protests throughout 2024, including a two-day strike in

March. Tensions escalated in May 2024, when the editorial board passed a no-confidence vote in director Rita Lofano over fears of conflicts of interest due to Lofano's close working relationship with former director Mario Sechi, who is now editor-in-chief of *Libero* (one of Angelucci's newspapers) and the former spokesman for Prime Minister Giorgia Meloni. Opposition parties, including the Partito Democratico and Movimento 5 Stelle, also came out against the sale. The Partito Democratico warned that it may violate the EMFA and brought the issue to the attention of EU institutions, sending a formal letter to European Commission Vice President Věra Jourová.¹⁹

There is also concern about political influence distorting media pluralism in **Malta**. The broadcasting ecosystem is dominated by the two main political parties, which directly own many media outlets, restricting pluralism and fairness in the country. Moreover, stations owned by political parties are still not subject to the Broadcasting Act's provisions on impartiality. Local newsroom Lovin Malta filed suit to make the Broadcasting Act cover party-owned stations, and to determine whether

17 Lits Benedek, *Mediaworks may be broken up, Mandiner may come under Balázs Orbán (Feldarabolhatják a Mediaworksöt, Orbán Balázs alá kerülhet a Mandiner)*, Forbes, 24 October 2024, <https://forbes.hu/uzlet/orban-balazs-mandin-er-mediaworks-kormany-sajto/>

18 Media Freedom Rapid Response, *Silencing the fourth estate: Italy's democratic drift - mission report*, July 2024, <https://www.mfrr.eu/mission-report-silencing-the-fourth-estate-italys-democratic-drift/>

19 Massimiliano Smeriglio, Parliamentary question - E-000890/2024, European Parliament, 21 March 2024, https://www.europarl.europa.eu/doceo/document/E-9-2024-000890_EN.html; Simone De La Feld, *Agì, PD to EU Commissioner Jourová: "Takeover a risk to journalists' independence"*, Eunews, 2 April 2024, <https://www.eunews.it/en/2024/04/02/agi-pd-to-eu-commissioner-jourova-takeover-a-risk-to-journalists-independence/>

propaganda on TV stations run by political parties is unconstitutional.²⁰ The Constitution obliges the Broadcasting Authority (BA) to ensure that TV stations preserve impartiality in matters of political or economic controversy and to ensure that broadcasting facilities and time are fairly apportioned between people belonging to different political parties. However, the Broadcasting Act of 1991 includes a loophole that allows the BA to circumvent this requirement when regulating political party media.

Since 2023, and as reported in last year's Liberties Media Freedom Report, there has been increasing concern about the state of media pluralism in the **Netherlands**. The Dutch Media Authority publishes its Media Monitor annually, and in 2023 it signalled that ownership concentration is worsening, a trend which continued into 2024. Between them, RTL Nederland and Talpa Network hold over three-quarters of the television market,²¹ while online news media are highly concentrated among websites owned by DPG Media,

Mediahuis and RTL Nederland.²² At the end of 2023, DPG Media announced its intention to acquire RTL Group. RTL Nederland is still the largest private broadcasting company, with a market share of 25.1%.²³ The proposed acquisition immediately raised concerns that it would lead to even further media concentration. The Dutch Authority for Consumers and Markets announced on 17 May 2024 that it would investigate the acquisition of RTL Nederland by DPG Media, indicating that, based on market research, the size, quality and pluriformity of media outlets available to consumers could be negatively affected. The Dutch Journalist Association has repeated its concerns, particularly for journalists' job security and bargaining power.²⁴

In May 2024, the coalition government announced that it planned to increase the VAT from 9% to 21% for print and online media. Independent research into the effect of this measure showed that it would have serious consequences for access to independent media, as turnover from subscriptions and single-copy

20 Julian Bonnici, *Lovin Malta Files Historic Case To Declare Propaganda By Political Party Stations Unconstitutional*, Lovin Malta, 1 February 2021, <https://lovinmalta.com/news/lovin-malta-files-historic-case-to-declare-propaganda-by-political-party-stations-unconstitutional/>

21 Dutch Media Authority (Commissariaat Voor de Media), *The Media Monitor 2024 (Mediamonitor 2024)*, 25 November 2024, <https://www.cvdm.nl/nieuws/mediamonitor-2024-verschuiving-in-mediagebruik-naar-internationale-plattformen-vormt-risico-voor-geinformeerdheid-van-burgers/>

22 Ibid

23 Ibid

24 Nederlandse Vereniging van Journalisten (NVJ), *NVJ Warns About Media Concentration Consequences in RTL Takeover by DPG Media (NVJ waarschuwt voor gevolgen mediaconcentratie bij overname RTL Nederland door DPG Media)*, NVJ, 17 May 2024, <https://nvj.nl/actueel/nvj-waarschuwt-gevolgen-mediaconcentratie-overname-rtl-nederland-dpg-media>

sales would shrink by 10%, as some 270,000 households would end their news subscriptions. This would in turn impact employment at these outlets; collectively, it is estimated that these news organisations would need to shrink by approximately 377 full-time employees.²⁵

In December 2024, **Polish** Prime Minister Donald Tusk announced that his government will add private broadcasters *TVN* and *Polsat* to its list of strategic companies, following reports that *TVN* could be bought by a company linked to Hungarian Prime Minister Viktor Orbán. By being listed as strategic companies, the two are now protected from hostile takeovers, and their sale must be approved by the government.²⁶

The situation in **Slovenia** also appears largely unchanged from previous years. A significant level of media concentration persists under the dominance of the Media24 group,²⁷ which is owned by the Odlazek family.²⁸ This group is particularly significant in the print and radio

market: according to recent research based on the 2022 data, Media24 consists of a network of 20 interconnected companies that are horizontally and vertically concentrated. These 20 companies operate a total of 121 print or broadcast media outlets (34 print editions – dailies, weeklies and lifestyle magazines), 73 radio stations, 12 online portals, and two television stations). Based on data from several research projects,²⁹ the media outlets taken over by this beneficiary owner routinely experience downsizing both in terms of finance and staffing. Even though the current Mass Media Act stipulates that the publisher of a daily newspaper cannot simultaneously be the publisher or co-founder of a radio or television programme,³⁰ such practices continue largely due to the ease of circumventing media law, stemming from inadequate regulation and oversight.

Another strain on media plurality comes directly from a single political party. Dozens of media outlets, owned by or affiliated with the right-wing Slovenian Democratic Party

25 Coalition Agreement ‘Hope, Courage and Pride’, 15 May 2024, <https://www.kabinetsformatie2023.nl/documenten/publicaties/2024/05/16/hoofdlijnenakkoord-tussen-de-fracties-van-pvv-vvd-nsc-en-bbb>; budgetary appendix <https://www.kabinetsformatie2023.nl/documenten/publicaties/2024/05/16/budgettaire-bijlage-hoofdlijnenakkoord>

26 Aleksandra Krzysztozek, *Donald Tusk Orbán-proofs Polish private media*, Euractiv 12 December 2024, <https://www.euractiv.com/section/politics/news/donald-tusk-orban-proofs-polish-private-media/>

27 For more information see Media24 group website at <https://media24.si>

28 Lenart J. Kučić, *Martin Odlazek’s Media (Part 1): An Obscure Network of Radio, Print, and Television (Mediji Martina Odlazka (1. del): nepregledna mreža radijev, tiskovin, televizije)*, Pod črto, 19 November 2020, <https://podcrto.si/mediji-martina-odlazka-1-del-nepregledna-mreza-radijev-tiskovin-televizije/>

29 For more information see websites of the following research projects: POPBACK at <https://www.popback.org>, AFEMED at <https://www.mirovni-institut.si/en/affective-media/> and MeDeMAP at <https://www.medemap.eu>

30 National Assembly of Slovenia, Mass Media Act (Zakon o medijih), 25 April 2001, and subsequent modifications.

(SDS), the largest opposition party, operate at both national and local levels, including a seemingly unconnected network of regional online media.³¹ These outlets predominantly function as propaganda tools rather than genuine media entities. In most cases, identical content is disseminated through these media outlets and platforms.

Spain's media landscape is characterised by a high concentration of ownership among a small number of conglomerates, which negatively affects information plurality and editorial independence. Although there is a wide and seemingly diverse media offering, it is controlled by a limited number of economic actors who dominate both traditional print media, digital platforms, and television and radio. This situation exists despite the fact that the country has rules to prevent excessive media concentration, as their application has been inconsistent. The National Commission for Markets and Competition has intervened in a few cases where mergers or acquisitions

threatened to reduce competition,³² but these decisions are usually taken behind closed doors with little public scrutiny.

The awarding of audiovisual licences is another avenue through which market plurality is under threat. Often perceived as a mechanism of political reward or punishment, this process raises concerns about fairness and transparency.³³ It is essential to ensure that licensing procedures are based on clear and objective criteria, with mechanisms that allow for a greater plurality of actors, public oversight and accountability by regulatory bodies.³⁴

A significant portion of **Sweden's** media outlets are owned by a few large corporations, such as the Bonnier Group and Schibsted. Bonnier owns roughly 43% of all subscription-based multi-day newspapers in Sweden, making them the largest player on the market. Schibsted is also a major player, directly owning 13 newspapers, including *Aftonbladet* and *Svenska Dagbladet*. Additionally, Schibsted

31 Lenart J. Kučić, *Infographic: SDS online media (Infografika: internetni mediji SDS)*, Pod črto, 10 December 2019, <https://podcrto.si/infografika-internetni-mediji-sds/>

32 Cinco Días, *The CNMC Opens Another Disciplinary Proceeding Against Telefónica for Breaching Commitments in the Purchase of Sogecable (La CNMC abre otro expediente sancionador a Telefónica por incumplir compromisos en la compra de Sogecable)*, Cinco Días, 18 November 2024, <https://cincodias.elpais.com/companias/2024-11-18/la-cnmc-abre-otro-expediente-sancionador-a-telefonica-por-incumplir-compromisos-en-la-compra-de-sogecable.html>

33 National Institute of Public Administration (Spain), *The Legal Regime of Prior Communication and Licenses in the New Law 13/2022, of 7 July, General Audiovisual Communication Law (El régimen jurídico de la comunicación previa y las licencias en la nueva Ley 13/2022, de 7 de julio, General de Comunicación Audiovisual)*, 20 October 2023, <https://laadministracionaldia.inap.es/noticia.asp?id=1514427>

34 María Pilar Cousido González, *Transparency in the audiovisual sector: comments on Spanish and European regulations (La transparencia en el sector audiovisual: comentarios a la normativa española y comunitaria)*, Bosch, 2008, https://books.google.es/books/about/La_transparencia_en_el_sector_audiovisua.html?id=OK5dQwAACAAJ

has indirect influence over other newspapers through its 29% ownership in Polaris Media, which in turn owns parts of Stampen Media.³⁵ This concentration of ownership can lead to a homogenisation of news content and perspectives, potentially limiting the diversity of viewpoints available to the public. Smaller, local newspapers and media outlets often struggle financially and may be bought out or forced to close, thereby reducing local news coverage and diminishing pluralism at the regional level.

Transparency of media ownership

Transparency of media ownership allows the public to understand who is behind the information they take in and use to form their personal opinions and choices – including at the ballot box. Ownership transparency also helps prevent political or corporate interference with editorial lines as well as conflicts of interest, and it helps ensure media accountability. The EU recognises its importance, and Article 6 (1) (2) of the European Media Freedom Act requires Member States to set up publicly accessible databases of the beneficial owners of all media outlets operating in their respective countries. Although this requirement enters into force in August 2025, the findings of this report should serve as a warning: many Member States still have not set up such databases; where they do exist, they are often lacking in

information, are not easily accessible, or face other issues that fall short of what is called for under the EMFA.

Also, it is important to note that ownership transparency laws vary widely across Europe. There are diverse requirements and databases, making it difficult to achieve a unified solution. In many countries, the ultimate owners remain hidden. The situation is even worse in countries that lack effective sanctions for non-compliance. The requirements set out in EMFA can lead to lack of integrated coordination and disjointed databases even within Member States, where different authorities and bodies are responsible for the enforcement of EMFA depending on the media type.

There is still a lack of transparency of media ownership in **Croatia**, despite multiple efforts to address the issue. The fact-checking platform Faktograf identified 11 separate records, including five databases in the Agency for Electronic Media (AEM), three types of announcements in the Official Gazette, the Register of Beneficial Owners, and two records in the Croatian Chamber of Commerce. Despite these, a complete picture of media ownership remains elusive due to hidden ownership structures or outdated declarations by publishers. Faktograf's analysis revealed that media ownership databases maintained by AEM are incomplete and partially inconsistent with guidelines issued by the Electronic Media

35 Schibsted, *Interim Report Q4 2020*, <https://static.schibsted.com/wp-content/uploads/2021/02/12062901/Interim-Report-Q4-2020.pdf>

Council (VEM), which oversees the agency.³⁶ Other records related to media ownership are also incomplete or inaccessible to the public.

Under the National Recovery and Resilience Plan 2021–2026, the Ministry of Culture and Media and AEM are working together to develop a fact-checking system and a public platform for media ownership and funding transparency, with €600,000 allocated to create a new platform that monitors real-time ownership changes. In September 2024, a software developer was contracted to build the system within 12 months.³⁷ In October 2024, the Minister of Culture and Media announced that a platform would be presented by the end of the year that would provide insight into the ownership structure of all media outlets and their sources of financing.³⁸ At the close of 2024, this platform had yet to be presented.

In the **Czech Republic**, the rules for disclosing media owners are no different than they are for the owners of any other business. However, access to the register of ultimate beneficial owners is limited. In October 2024, a

roundtable discussion was held in the Senate of the Czech Republic to address the implementation of the EMFA. The discussion focused on transparency in media ownership, rules for allocating public advertising, and the role of media regulators, and participants agreed with the proposal to create a database of the ultimate beneficial media owners that would be fully accessible.³⁹

Although parts of Articles 6 (1) and (2) and 22 of the EMFA are covered by **Greek** law, they are often ignored. Under the Greek Constitution, all TV channels and radio stations are required to disclose their ownership status to the National Council for Radio and Television (NCRTV), but the register is poorly maintained and irregularly updated. According to a new report by the International Press Institute and the Media and Journalism Research Center, one such example is that of Alpha TV, where a company based in Luxembourg exercises 50% control over the TV channel, and the owner is a lawyer and an administration services company. Consequently, there is no information available regarding the beneficial

36 Veronika Rešković, *As many as 11 records, and media ownership is still non-transparent (Čak 11 evidencija, a vlasništvo medija i dalje netransparentno)*, Faktograf, 28 December 2023, <https://faktograf.hr/2023/12/28/cak-11-evidencija-a-vlasnistvo-medija-i-dalje-netransparentno/>

37 Ibid

38 Croatian Journalists' Association, *Obuljen Koržinec: A platform with insight into the ownership structure of all media will be presented by the end of the year (Obuljen Koržinec: Do kraja godine bit će predstavljena platforma s uvidom u vlasničku strukturu svih medija)*, 18 October 2024, <https://www.hnd.hr/obuljen-korzinek-do-kraja-godine-bit-ce-predstavljena-platforma-s-uvidom-u-vlasnicku-strukturu-svih-medija>

39 ČTK, Live: Round Table “Media Freedom Act in Czechia” (Živě: Kulatý stůl „Media Freedom Act v ČR“), České Noviny, 8 October 2024, <https://www.ceskenoviny.cz/pr/zpravy/zive-kulaty-stul-media-freedom-act-v-cr/2579621>

owner.⁴⁰ Additionally, the NCRTV has a specific department that reports on all ownership changes in TV channels, but the data it releases to the public are not considered reliable due to the significant delays in publication. As a result, it remains the case that changes in media ownership will become apparent to the public either through journalists specialising in media reporting or only after a significant delay – potentially years – from the NCRTV.

Regulations in **Hungary** require that people have access to details of media ownership through the company register, at least in theory. The National Media and Infocommunications Authority (NMHH) operates a register of the country’s media outlets,⁴¹ and Hungarian law requires media service providers to make some key information publicly available, including the legal name or corporate name, address or registered office, postal address and other means of contact, of each media entity. However, this still does not include key information such as beneficial ownership chains or the amount of public funds used for state advertising.⁴²

A growing challenge to media ownership transparency is the rise of new media-like platforms and actors that fall outside the scope of existing media regulations. One example is Szent Korona Rádió (Holy Crown Radio), which claims to convey “the sound of tradition” and operates as a government-friendly blog that publishes articles that could be fairly labeled smear campaigns. Although it resembles official media websites, it is not listed as a press product by the NMHH, meaning its founders and ownership details are not accessible. Because it is not registered, no rectification or procedures based on the infringement of moral rights can be initiated against its content, leaving it outside the law with no regulations to limit its activities. To date, the NMHH has not taken any action to regulate the blog. Another example is Megafon, founded by the director of the Centre for Fundamental Rights, with the aim of “amplifying national voices” against what it describes as “left-liberal content” flooding social media.⁴³ The company funds influencers who promote government propaganda, and although the financial background is not transparent, it is

40 Incubator for Media Education and Development, *Media Capture in Greece: A new report by IPI & MJRC*, 19 November 2024, <https://www.imedd.org/media-capture-in-greece-a-new-report-by-ipi-mjrc/>

41 National Media and Infocommunications Authority (Hungary), database of press products, https://sajtopub.nmhh.hu/sajto_kozzetetel/app/index.jsp?lang=1

42 International Press Institute, *Hungary Media Capture Monitoring Report*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Hungary-Media-Capture-Monitoring-Report-Final-1.pdf>

43 Megafon Digital Incubator Nonprofit Ltd, <https://megafon.hu/>; K-Monitor Database, *Megafon Digitális Inkubátor Központ Nonprofit Kft.*, <https://adatbazis.k-monitor.hu/adatbazis/cimkek/megafon-digitalis-inkubator-kozpont-nonprofit-kft>

indirectly funded by the government, according to investigative journalists.⁴⁴

Italy's media market is dominated by outlets whose true beneficial owners remain hidden within a complex chain of ownership, often a pyramid-like structure where a holding company controls several companies and their related outlets. This can make it difficult to trace back to the ultimate media owner, further increasing the risk of media concentration and potential ties to political or other vested interests.⁴⁵ The government has yet to introduce reforms to ensure full disclosure of ownership and potential conflicts of interest in the media sector. Such efforts are also needed in **Malta**, where there are no specific legal obligations for media companies to publish their ownership structures on their website or in documents that are easily accessible to the public. However, all companies in Malta are obliged to submit a Memorandum of Association with the Registrar of Companies, which will display

the details of the company shareholders on the Malta Business Registry website.⁴⁶

Most of the objectives in the EMFA have been identified as already compatible with existing media law in the **Netherlands**, but this is not the case for the establishment of a database on ownership in the media sector. In March of 2024 the state secretary of education, culture and science identified this among other areas requiring further implementation in order to bring the country in line with the EMFA, although there has been no information since on the development of this database.⁴⁷

Financing framework, including allocation of state advertising

State advertising expenditures are a vital financial resource for many media outlets, in

44 Sarkadi Nagy Márton, *The Cabinet Office is pouring money into the Center for Fundamental Rights through a foundation (Egy alapítványon keresztül önti a pénzt a kabinetiroda az Alapjogokért Központba)*, Átlátszó, 4 March 2021, <https://atlatszo.hu/kozpenz/2021/03/04/egy-alapitvanyon-keresztul-onti-a-penzet-a-kabinetiroda-az-alapjogokert-kozpontba/>

45 Media Freedom Rapid Response, *Silencing the fourth estate: Italy's democratic drift - mission report*, July 2024, <https://www.mfrr.eu/mission-report-silencing-the-fourth-estate-italys-democratic-drift/>

46 Euromedia Ownership Monitor, *Malta: News media outlets and owners*, September 2023, <https://media-ownership.eu/findings/countries/malta/>

47 Senate of the Netherlands, Proposal for a Regulation of the European Parliament and of the Council establishing a common framework for media services in the internal market ("Media Freedom Regulation") and amending Directive 2010/13/EU (Voorstel voor een Verordening van het Europees parlement en de Raad tot vaststelling van een gemeenschappelijk kader voor mediadiensten op de interne markt («verordening mediavrijheid») en tot wijziging van Richtlijn 2010/13/EU), 36249 nr. K, 19 March 2024, <https://zoek.officielebekendmakingen.nl/kst-36249-K.html>

particular those that are financially unstable like smaller, independent publications. This revenue source is especially important as media outlets suffer from increasing drops in advertising revenue and subscription income. A country's advertising expenditure should be dispersed in a non-discriminatory and transparent way – which will be required under the EMFA beginning in August 2025. It is therefore troubling that many EU governments continue to wield state advertising money as a weapon – giving it to certain media outlets to keep them docile, or withholding it from critical media as a form of punishment.

According to the latest available data from 2017–2021, a total of €5 million from EU funds was distributed towards media in **Bulgaria**, meaning state advertising accounts for less than 5% of the overall advertising market in the country and comes primarily from EU-funded communication campaigns.⁴⁸ Although state advertising funds are distributed through formal public procurement procedures and include transparency requirements, they nevertheless remain a potential tool to influence editorial decision making.

This potential threat also persists in **Croatia**. The Electronic Media Act stipulates that state

bodies and legal entities owned by the state must allocate 15% of their annual budget to promote their services or activities through advertising, but this process remains poorly regulated, and the distribution of funds is not transparent and opens the door to influence peddling. In December 2023, such a case was reported by the European Federation of Journalists and the Croatian Journalists' Association, where an advisor to the former Minister of Economy used his position to promise Mreža TV €90,000 in funding from the Environmental Protection and Energy Efficiency Fund for an advertising campaign. The advisor reportedly requested that his contact at Mreža TV arrange for part of the funds to be redirected to him, and then influenced the Fund to hire that outlet to air the campaign. Despite the scandal, no adequate system of oversight for public spending on media, based on professional and public-interest criteria, has since been introduced.⁴⁹

In 2024, the **Czech** government approved the National Public Procurement Strategy for 2024–2028, the first comprehensive policy document in the field of public procurement in the Czech Republic. Its primary goal is to shift the focus from formal processes to a strategic approach that emphasises value for money,

48 Bulgarian Association of Communications Agencies, *Медийният пазар се възстановява след пандемията. Телевизията и дигиталните медии са най-предпочитаните от рекламодателите медийни канали*, https://www.baca.bg/wp-content/uploads/2023/01/2022_Media-Market_bg_update.pdf

49 Piše Hina, *The Mreža affair is an example of state capture of the media: "He did it because he could, there are no regulations"* (*Afera Mreža primjer je državnog zarobljavanja medija: "To je radio zato što može, nema regulative"*), Dnevnik, 13 December 2023, <https://dnevnik.hr/vijesti/hrvatska/efj-i-hnd-afera-mreza-primjer-je-drzavnog-zarobljavanja-medija---817635.html> and <https://www.hnd.hr/efj-i-hnd-afera-mreza-primjer-je-drzavnog-zarobljavanja-medija>

thereby promoting transparency and efficiency in public spending, including state advertising expenditures.⁵⁰

The allocation of state advertising in **Greece** continues to face criticism for its lack of transparency and potential bias. State advertising has for some time been distributed in ways that appear to favour media outlets with government-aligned editorial lines, raising concerns about indirect influence over media content. There was no discernible change in 2024.⁵¹ The European Parliament, in its 2024 resolution,⁵² stressed that Greece must ensure fair and transparent allocation of state resources to media outlets to prevent undue influence.

There are no regulations in place that limit the scope or set the rules for the transparency of state advertising in **Hungary**. It is widely

recognised that state advertising money is funnelled to pro-government outlets and withheld from independent ones, preventing fair competition and distorting the market.⁵³ The scale of state advertising expenditures is disproportionately large, benefiting only pro-government companies,⁵⁴ that loyally promote government propaganda. The state advertising spending is built on public procurement. There are also no rules limiting government advertisements. Between 31 December 2023 and 15 June 2024, a total of HUF 4.151 billion (€10,185,665) was spent on political ads on Facebook and Google in Hungary. On Facebook alone, the governing Fidesz party and government-aligned organisations Megafon and CÖF spent HUF 2.136 billion (€5,241,100) – four times the amount spent by all opposition parties combined. A significant portion of this came from public funds.⁵⁵

50 Ministry of Regional Development (Czech Republic), National Strategy for Public Procurement in Czechia for the Period 2024–2028 (Národní strategie veřejného zadávání v ČR pro období 2024–2028), January 2024, <https://mmr.gov.cz/cs/ministerstvo/verejne-zakazky-a-elektronizace/narodni-strategie-verejneho-zadavani-v-cr>

51 International Press Institute, *Media Capture Monitoring Report: Greece measuring compliance with the European Media Freedom Act*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>

52 European Parliament, Resolution on the rule of law and media freedom in Greece, 7 February 2024, https://www.europarl.europa.eu/doceo/document/TA-9-2024-0069_EN.html

53 Transparency International (Hungary), *Contributions of Hungarian CSOs to the European Commission's Rule of Law Report*, 9 January 2024, https://transparency.hu/wp-content/uploads/2024/01/HUN_CS0_contribution_EC_RoL_Report_2024-1.pdf

54 Mérték Media Monitor, *Government Advertising Database (Állami hirdetések adatbázisa)*, Atlatszo, <https://mertek.atlatszo.hu/allamihirdetesek/>

55 Világi Máté, *The government side spent record amounts on online advertising during the election campaign, even at European level (Európai szinten is rekordsokat költött netes reklámokra a kormányoldal a választási kampány során)*, Telex, 21 June 2024, <https://telex.hu/belfold/2024/06/21/internet-kampany-koltes-fidesz-valasztas-political-capital>

As of the close of 2024, **Malta's** government still has made no attempt to create a more fair and transparent system for the allocation of state advertising. Proposals that were presented by the Commissioner of Standards in Public Life back in 2021 continue to be ignored.⁵⁶ Information about the allocation of state advertising for media outlets is not publicly available and there is no legislation that regulates the process, and the information that is known is patchy. For example, while it is known that during October and November 2022, the government budgeted and spent €115,000 in advertisement over a period of three weeks, it is not known how the money was spent or which newsrooms it was allocated to, despite requests from journalists.⁵⁷ The lack of transparency and an established process according to pre-set criteria means that the government can allocate public advertising funds preferentially to

favoured media outlets, including media that are owned by the governing party.

The **Netherlands** must also make strides to improve transparency around state advertising expenditures. In March of 2024, the state secretary of education, culture and science included this issue on a list of areas the government must address in order to bring the country in line with the European Media Freedom Act.⁵⁸ This is already the case in **Slovenia**, where the draft Mass Media Act⁵⁹ adheres to the principles of the EMFA with regard to greater transparency of state advertising. According to the Article 21 of the draft law, state institutions shall be required to regularly report on all media expenditures, including advertising, campaigns, and other media leases.⁶⁰ The data shall include the amount of funds or other contributions allocated to media activities in the

56 Commissioner for Standards in Public Life, *Guidelines on Government Advertising and Promotional Material*, 2 August 2021, <https://standardscommissioner.mt/wp-content/uploads/guidelines-government-advertising-promotional-material.pdf>

57 Sarah Carabott, *Government spent at least €115,000 in 3 weeks to promote budget measures*, Times of Malta, 1 December 2022, <https://timesofmalta.com/article/government-spent-least-115000-promote-budget-measures.998361>

58 Senate of the Netherlands, Proposal for a Regulation of the European Parliament and of the Council establishing a common framework for media services in the internal market ("Media Freedom Regulation") and amending Directive 2010/13/EU (Voorstel voor een Verordening van het Europees parlement en de Raad tot vaststelling van een gemeenschappelijk kader voor mediadiensten op de interne markt («verordening mediavrijheid») en tot wijziging van Richtlijn 2010/13/EU), 36249 nr. K, 19 March 2024, <https://zoek.officielebekendmakingen.nl/kst-36249-K.html>

59 For more information see the draft Mass Media Act at <https://imss.dz-rs.si/IMiS/ImisAdmin.nsf/ImisnetAgent?OpenAgent&2&DZ-MSS-01/d6fd1153855435e83b8d6104ed013942ae66d2dd26a9901a2db0b-4308cb6123a>.

60 For more information see the draft Mass Media Act at <https://imss.dz-rs.si/IMiS/ImisAdmin.nsf/ImisnetAgent?OpenAgent&2&DZ-MSS-01/d6fd1153855435e83b8d6104ed013942ae66d2dd26a9901a2db0b-4308cb6123a>.

preceding year, including those for advertising, sponsorship, product placement in media, payments for commissioned content, and donations to publishers. Furthermore, they must report the final recipients (publishers) of these funds or contributions. The ministry is responsible for publicly disclosing this data on its official website. Media outlets are also mandated to report these data in the new Media Register, as detailed in the subsequent section.

Although **Spain** has regulations aimed at preventing the misuse of state advertising budgets, in practice the allocation lacks transparency and is influenced by politics. Contracts and amounts awarded are rarely subject to public scrutiny, fuelling perceptions of favouritism. As of January 2025, Spain has announced plans to reform its institutional advertising law with the aim of improving transparency, proportionality and non-discrimination in the allocation of state advertising. However, these measures are still in the planning stage.

Public service media

Public service media (PSM) serve the public by delivering reliable, fact-based, public-interest information and entertainment, helping to bring important matters to people's attention and providing them a place to turn to for impartial reporting. In many EU countries, however, PSM serve the government's communications needs, or at least must operate in a way that

doesn't portray the government or its policies in a negative light. With so many people still relying on PSM as trusted sources of information, it is essential that the EMFA's provisions to address threats to it are fully enforced by every Member State and the national media regulators, with the support and monitoring of the EU and the Board.

The public service media system in **Bulgaria** is split into three separate entities – Bulgarian National Television, Bulgarian National Radio, and the Bulgarian Telegraph Agency – which operate with overlapping functions that beget inefficient resource use and duplicated administrative costs. This fragmented system struggles to compete in the digital media ecosystem. Content quality continues to be an issue, including a lack of in-depth investigative journalism, strong editorial positions, and quality public-affairs programming. Complicating these problems is the reliance on a short-term state funding regime that is open to political influence. This funding remains insufficient for PSM to produce quality content, attract and retain talent, or invest in new technologies, and the absence of long-term financial planning further limits their ability to adapt and innovate.

In **Croatia**, the independence of public broadcaster Croatian Radiotelevision (HRT) has yet again been called into question following the politicised election of the Programming Council and the Supervisory Board.⁶¹ In September

61 Reporters Without Borders, *Croatia*, 2024, <https://rsf.org/en/country/croatia>

2024, Media Freedom Rapid Response also warned of the lack of independence of HRT,⁶² and the Media Pluralism Monitor assessed medium risk (50%) to the independence of public media services precisely because of the high risk of politicisation of the management and editorial staff.⁶³ The independence of the editorial policy at HRT was further called into question during the run-up to the presidential elections, which were held from December 2024 to January 2025. The non-governmental organisation Gong warned the Program Council of HRT that the presidential candidate of the ruling party, Dragan Primorac, was being heavily promoted in HRT's programming and prioritised over other candidates.⁶⁴ Gong demanded that HRT adopt new rules for reporting on candidates as soon as possible, and, in an encouraging turn, the HRT Programming Council acknowledged the existence of the problem.⁶⁵

In November 2024, more than 60 **Czech** institutions, including cultural and humanitarian organisations, called on the government to ensure the independence and financial stability of public service media. They emphasised the crucial role of independent public service media in a democratic society and urged for the swift adoption of the proposed amendments.⁶⁶ The public plea came as politicians were debating a rise in radio and television licence fees, a funding source that is potentially stable and able to ensure independence from political power. Failure to approve a new licence fee regime could force PSM to change their funding to rely on the state budget, which could threaten their independence. By the close of the year, the Czech Parliament had taken no action; in February 2025, legislators again failed to approve new fees.⁶⁷

62 European Federation of Journalists, *Croatia: Major challenges ahead to improve media freedom*, 25 September 2024, <https://europeanjournalists.org/blog/2024/09/25/croatia-major-challenges-ahead-to-improve-media-freedom/>

63 Paško Bilić; Antonija Petričušić, *Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European member states and in candidate countries in 2023. Country report : Croatia*, Centre for Media Pluralism and Media Freedom, 2024, <https://cadmus.eui.eu/handle/1814/76996>

64 Gong, *Gong to HRT: Primorac is a candidate both when diving and when traveling to India (Gong HRT-u: Primorac je kandidat i kad roni i kad putuje u Indiju)*, 17 September 2024, <https://gong.hr/2024/09/17/gong-hrt-u-primorac-je-kandidat-i-kad-roni-i-kad-putuje-u-indiju/>

65 Gong, *The program council of HRT agreed with Gong, and warned the editors to monitor the elections more responsibly (Programsko vijeće HRT-a se složilo s Gongom, upozorilo uredništvo na odgovornije praćenje izbora)*, 5 October 2024, <https://gong.hr/2024/10/05/programsko-vijece-hrt-a-se-slozilo-s-gongom-upozorilo-urednistvo-na-odgovornije-pracenje-izbora/>

66 Brno Daily, *Over 60 Institutions Call on Government to Support Public Media*, November 2024, <https://brnodaily.com/2024/11/19/news/politics/over-60-institutions-call-on-government-to-support-public-media>

67 Reporters Without Borders, *Czechia: RSF urges MPs to approve media license fee increase*, 19 February 2025, <https://rsf.org/en/czechia-rsf-urges-mps-approve-media-license-fee-increase>

In **France**, the government's proposal to reform the public broadcasting sector by merging the various public service media outlets was scheduled to go before the National Assembly on 23 May 2024. Prior to this date, however, it was withdrawn from the agenda due to its unpopularity and against a backdrop of public service strikes leading up to the 2024 European Parliament elections 2024. However, with the support of the Minister of Culture, Rachida Dati, the reform was reinstated in late 2024 during Michel Barnier's government, prompting a joint article by all the journalists' associations denouncing the reform and warning that it would lead to "an impoverishment of the information on offer" and the risk of "being more susceptible to pressure, particularly political pressure, once united under a single management."⁶⁸

A plan to reform public service media in **Germany** progressed during the second half of 2024. Under plans proposed by the Prime Minister of the federal states, public service

media will be restructured, with revised contracts for the services of national PSM stations ARD and ZDF and fewer stations, especially local radio and special-interest offerings.⁶⁹ The Broadcasting Commission of the federal states may not interfere with the editorial decisions of PSM, and the changes will be limited to structural and operational issues with the aim of making PSM more efficient and less costly, especially through increased digitisation.⁷⁰ The reform closed a public consultation period in October, and the changes could become law by the summer of 2025.

The independence and effectiveness of **Greece's** public service media continue to cause concern. In 2024, the International Press Institute and the Media and Journalism Research Center released a report⁷¹ highlighting significant issues with the independence of Greece's PSM. The report underscores that the Hellenic Broadcasting Corporation is susceptible to political and economic pressures, with the frequent replacement of executives with each

68 Le Monde, *Draft reform on public broadcasting: No, public broadcasting media will not be stronger together (Projet de réforme de l'audiovisuel public : « Non, les médias audiovisuels publics ne seront pas plus forts ensemble »)*, 22 May 2024, https://www.lemonde.fr/idees/article/2024/05/22/projet-de-reforme-de-l-audiovisuel-public-non-les-medias-audiovisuels-publics-ne-seront-pas-plus-forts-ensemble_6234864_3232.html

69 ZDFheute, *States present reform plans for ARD and ZDF (Länder legen Reformpläne für ARD und ZDF vor)*, 27 September 2024, <https://www.zdf.de/nachrichten/politik/deutschland/medienpolitik-reformstaatsvertrag-entwurf-zdf-ard-oeffentlich-rechtliche-sender-100.html>

70 Zeit Online, *States Present Reform Plan for Public Broadcasts (Länder legen Reformplan für Öffentlich-Rechtliche vor)*, 27 September 2024, <https://www.zeit.de/kultur/film/2024-09/oeffentlich-rechtlicher-rundfunk-reform-laender-entwurf>

71 International Press Institute, *Media Capture Monitoring Report: Greece*, 19 November 2024, <https://ipi.media/publications/media-capture-monitoring-report-greece/>

change of government undermining the public broadcaster's stability and independence.⁷²

Public service media in **Hungary** are centralized under the Public Service Public Foundation and function as an extension of the government's communications arm. State media broadcasts government propaganda without allowing space for criticism or questioning. According to the 2025 budget, PSM will have more than HUF 165 billion (€409,259,235) to spend, 25 billion more than the amount foreseen for this year.⁷³ While the situation of PSM in Hungary is not new, there is alarm that it could be getting even worse.

Overall, the organisation and funding structure of public service media remain unchanged in their overly complex and non-transparent nature. The ruling Fidesz party's lack of desire to improve PSM and bring a modicum of independence is evident in their reaction to the European Media Freedom Act, which the

government shows open hostility to. A Fidesz delegate described the EMFA as a "censorship law" and another attempt to undermine Member States' sovereignty, arguing that it seeks to establish total control over the media.⁷⁴

Two developments in 2024 raised concerns about the independence of **Ireland's** public service media. First, the National Union of Journalists (NUJ), which represents workers across Irish media, from newspapers and broadcasting to magazines and websites, indicated that it will write to the main opposition party, Sinn Féin, to express concerns regarding the party's call for a review of public service broadcaster RTÉ's coverage of Gaza for "bias".⁷⁵ Second, the failure to provide adequate funding and to reform the licence collection system has had an impact on RTÉ.⁷⁶ As of January 2024, the government has not provided information on long-term proposals for the funding of public service broadcasting beyond the three-year agreement, as outlined previously. The NUJ

72 International Press Institute, *Media Capture Monitoring Report: Greece Measuring Compliance with the European Media Freedom Act*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>

73 Kovács Pál, *452 million forints a day to be spent on public media next year (Jövőre napi 452 millió forintot költhetnek a közmédiák működésére)*, Telex, 21 October 2024, <https://telex.hu/gazdasag/2024/10/21/160-milliard-forint-koltsegetes-2025-kozmedia-mtva>

74 Márton Balázs, *The European Parliament voted on a law declaring the independence of public media, and Fidesz fears censorship. (A közmédiák függetlenségét kimondó jogszabályt szavazott meg az EP, a Fidesz cenzúrától tart)*, Telex, 13 March 2024, <https://telex.hu/kulfold/2024/03/13/eu-europai-parlament-media-kozmedia-szabadsag-fuggetlenseg>

75 Diarmuid Pepper, *Taoiseach says Sinn Féin pledge to review RTÉ's Gaza coverage is a 'dog whistle to conspiracy theorists'* The Journal, 20 November 2024. <https://www.thejournal.ie/taoiseach-says-sinn-fein-pledge-a-dog-whistle-to-conspiracy-theorists-6547589-Nov2024/>

76 Jane Moore, *TV licence fee in place for RTÉ 'utterly broken', Dee Forbes tells committee*, The Journal, 20 January 2022, <https://www.thejournal.ie/licence-fee-rte-utterly-broken-dee-forbes-oireachtas-committee-5659707-Jan2022/>

views this action as an impediment to securing the future viability of public service broadcasting as it fails to address long-term funding concerns.⁷⁷

Italy's PSM has long faced political influence, and developments over the last year are particularly relevant to the country's enforcement of the European Media Freedom Act. Key concerns stem from public broadcaster RAI's governance and funding structures, which currently leave it vulnerable to political interference. RAI's governance remains regulated by Law No. 220/2015,⁷⁸ better known as the Renzi Bill. Under this law, of the seven members of RAI's board of directors, two are elected by the government, two by the Chamber of Deputies, two by the Senate and one by RAI employees. Such a provision allows for significant influence by the ruling majority, exposing the public broadcaster to the risk of undue political interference. The Renzi Bill also grants enhanced powers to the RAI's CEO, who is selected by the government and can enjoy considerable expenditure freedom.

These provisions directly contravene the European Media Freedom Act (EMFA), which is to be enforced by August 2025. In light of this, in May 2024 two lawsuits were filed with the Regional Administrative Court of Lazio to halt the procedure for the renewal of RAI board of directors based on the EMFA violations.⁷⁹ One argued that the current procedure does not comply with transparency and non-discrimination requirements in the EMFA, while the second appeal raised concerns about the candidate's independence from the executive powers and requested a referral to the EU Court of Justice to assess any violations of the EMFA in this regard.⁸⁰ Despite these legal actions, RAI's new board of directors was installed on 1 October.

Journalists at RAI face unprecedented pressure and self-censorship because of political pressure. For example, the cancellation of Italian intellectual Antonio Scurati's antifascist monologue in April 2024,⁸¹ and the subsequent disciplinary case initiated against journalist Serena Bortone, host of the show on which

77 National Union of Journalists, *Funding plan fails to address core issue, says NUJ*, 24 July 2024, <https://www.nuj.org.uk/resource/broadcasting-funding-plan-fails-to-address-core-issue-says-nuj.html>

78 Legge N. 220/2015, *Gazzetta Ufficiale della Repubblica Italiana*, 15 January 2016, <https://www.gazzettaufficiale.it/eli/gu/2016/01/15/11/sg/pdf>

79 These legal actions were supported by several civil society organisations and unions, such as Articolo 21, Slc-Cgil, Usigrai, Rete No Bavaglio, Infocivica, and TvMediaWeb.

80 Media Freedom Rapid Response, *Silencing the fourth estate: Italy's democratic drift – mission report*, July 2024, <https://www.mfrr.eu/mission-report-silencing-the-fourth-estate-italys-democratic-drift/>

81 European Centre for Press and Media Freedom, *Rai's editorial independence questioned after censorship allegations*, Mapping Media Freedom, 20 April 2024, <https://www.mapmf.org/alert/31460>

the speech was to be performed.⁸² In response to the increasing pressure, RAI's journalists' union, Usigrai, organised a 24-hour strike on 6 May 2024, and a large majority of Usigrai members (75%) joined the strike to denounce attempts to turn RAI into a government mouthpiece.⁸³

At the beginning of November 2024, in a possible sign of the country's commitment to reforming RAI and aligning with the EMFA, the RAI Parliamentary Oversight Committee organised the '*Stati Generali del Servizio Pubblico*' event to discuss the challenges and future development of public RAI.⁸⁴ The event brought together political, institutional, and media representatives, including RAI executives and representatives from journalistic and media unions, communication experts and European media regulation stakeholders.

In early April 2024, the merger of **Latvian** Radio and Latvian Television was completed,

with the two state-owned companies merging to form LSM (Latvijas Sabiedriskais Medijs; Latvian Public Service Media), which would then start operations on 1 January 2025. On 13 November, the Public Electronic Mass Media Council approved the five-year term of office of the Board of the merged LSM, which will start its work at the beginning of January 2025.⁸⁵ At the beginning of 2025, the Latvian Public Service Media had 865 staff and an assigned operating budget of €51.339 million.⁸⁶

The editorial line of **Malta's** Public Broadcast Service (PBS) is not free of political interference, with much of the reporting peppered with bias towards the party in government. The reporting frequently lacks depth, with some articles no more than a sentence or two in length, and important news stories are sometimes pushed to the bottom of the news website so that headlines do not put the government in a bad light. At the time of writing, the government

82 Ordine dei Giornalisti, *RAI: disciplinary proceedings against Serena Bortone. Solidarity from the cpo and GiULiA journalists (RAI: procedimento disciplinare per Serena Bortone. La solidarietà delle cpo e di GiULiA giornaliste)*, ODG, 9 May 2024, <https://www.odg.it/procedimento-disciplinare-per-serena-bortone-la-solidarieta-delle-cpo-e-di-giulia-giornaliste/56779>

83 FNSI, *Rai, Usigrai proclaims journalists' strike on May 6 (Rai, Usigrai proclama sciopero dei giornalisti il 6 maggio)*, FNSI, 25 April 2024, <https://www.fnsi.it/rai-usigrai-proclama-sciopero-dei-giornalisti-il-6-maggio>

84 FNSI, *General States of Public Service, Costante: «Yes to a law for Rai, but the sector needs reform» (Stati generali del servizio pubblico, Costante: «Sì a una legge per Rai, ma serve la riforma del settore»)*, FNSI, 6 November 2024, <https://www.fnsi.it/stati-general-del-servizio-pubblico-costante-si-a-una-legge-per-rai-ma-serve-la-riforma-del-settore>

85 Latvian Public Media, *New Latvian Public Media Board Confirmed*, LSM.LV, 13 November 2024, <https://eng.lsm.lv/article/features/media/13.11.2024-new-latvian-public-media-board-confirmed.a576262/>

86 TVNET, *865 employees will work in the unified public media (Vienotajā Latvijas Sabiedriskajā Medijā nākamā gada sākumā strādās 865 darbinieki)*, 28 December 2024. <https://www.tvnet.lv/8162255/vienotaja-latvijas-sabiedriskaja-medija-nakama-gada-sakuma-stradas-865-darbinieki>

has not yet implemented the provisions of the European Media Freedom Act.

At the very end of December 2023, the Minister of Culture and National Heritage of **Poland** declared public broadcasting companies – including both television and radio channels – insolvent and initiated legal bankruptcy proceedings against them. This allowed the minister to appoint receivers to temporarily manage the companies, although this action does little to safeguard the companies' independence. Receivers may be dismissed at any time and for any reason by the majority shareholder – the Polish state, represented by the minister himself. Although this measure was reportedly intended to mitigate legal controversies surrounding the changes in public media, in practice it has placed these institutions in a legal framework with even fewer formal guarantees of independence than before. This situation continued for the entirety of 2024, with public service media continuing to operate under this state of uncertainty.⁸⁷

Last year brought no progress towards enhancing the independent governance and

editorial independence of public service media in **Romania**. A bill from June 2021 to reform the law on public broadcasting and radio companies is still under discussion in Parliament and no further mechanisms to ensure the independence of PSM have been adopted.⁸⁸

Public service media in **Slovakia** went through an alarming transformation in 2024. As of 1 July 2024, the previous public television and radio, Radio and Television of Slovakia (RTVS), ceased to exist following parliamentary approval of the government's proposal to abolish RTVS and replace it with a new institution, Slovak Television and Radio (STVR). Under the new Law on Public Television and Radio, the Director General of the new STVR will be elected by the Board of STVR, and the members of STVR's Board will be elected by the Parliament and the Minister of Culture, meaning the entire leadership of the new public broadcaster is under the influence of the current governing coalition. There are now no safeguards to prevent public television from becoming a propaganda instrument of the government.⁸⁹ The consequences of this law will be closely watched in 2025. At present, there appears to be less criticism of the government

87 International Press Institute, *MFRR in focus: The state of Poland's public service media*, 31 October 2024, <https://ipi.media/ipimedia/mfrr-in-focus-the-state-of-polands-public-service-media/>

88 Legislative proposal to amend Law no. 41/1994 of 17 June 1994, on the organisation and functioning of the Romanian Broadcasting Company and the Romanian Television Company, Pl-x. nr. 262/2021, https://www.cdep.ro/pls/proiecte/upl_pck2015.proiect?idp=19380

89 The European Broadcasting Union, *Slovak government proposals threaten media independence*, 13 March 2024, <https://www.ebu.ch/news/2024/03/slovak-government-proposals-threaten-media-independence>

in the public service media,⁹⁰ but overall it maintains the required level of objectivity and independence. The impact of the abolition of the previous RTVS and the creation of the new STVR under the current government will have to be assessed in time.

This move by the ruling coalition has sparked mass protests and opposition,⁹¹ strikes and staff walkouts,⁹² and public concern about the independence and objectivity of public television and radio.⁹³ Furthermore, the abolition of RTVS led to a motion to the Constitutional Court in July 2024 to assess the

constitutionality of the law that abolished and replaced the public broadcaster. The applicants challenged not only the unconstitutionality of the law, but also the legislative process through which it was adopted. The Constitutional Court has not yet ruled on the motion.⁹⁴

Recent events in **Slovenia**, however, are on the whole encouraging. The de-politicised governing model of RTV Slovenia, introduced in 2022 by the current government,⁹⁵ has successfully allowed RTV Slovenia's governing body to function free from government influence or the influence of other political actors.

90 Jaroslav Barborák, *There is pressure to balance criticism of the government in STVR, independent public affairs has no place here, says former foreign affairs chief Soňa Weisssová (V STVR je tlak na vyvažovanie kritiky vlády, nezávislá verejnoprávnosť tu nemá miesto, tvrdí bývalá šéfká zahraničia Soňa Weisssová)*, Aktuality.sk, 22 October 2024, <https://www.aktuality.sk/clanok/ZKKWzWR/v-stvr-je-tlak-na-vy vazovanie-kritiky-vlady-nezavisla-verejnopravnost-tu-nema-miesto-tvr-di-byvala-sefka-zahranicia-sona-weissova-podcast/>

91 RTVS, *People took to the streets to express their opposition to the bill on the abolition of RTVS (Živá reťaz okolo rozhlasu: Ľudia vyšli do ulíc vyjadriť nesúhlas s návrhom zákona o zrušení RTVS)*, Spravy, 27 March 2024, <https://spravy.rtvsk.sk/2024/03/ziva-retaz-okolo-rozhlasu-ludia-vysli-do-ulic-vyjadrit-nesuhlas-s-navrhom-zakona-o-zruseni-rtvs/>

92 RTVS, *RTVS employees protested against the STVR law: at the moment it may be the last thing we can do (Zamestnanci RTVS protestovali proti zákonu o STVR: V tejto chvíli je to možno to posledné, čo môžeme urobiť)*, Spravy, 20 June 2024, <https://spravy.rtvsk.sk/2024/06/zamestnanci-rtvs-protestovali-proti-zakonu-o-stvr-v-tejto-chvili-je-to-mozno-to-posledne-co-mozeme-urobit/>

93 NGOs, including VIA IURIS, also reacted to the move by sending a letter to the EC and EP MPs expressing their concerns about the restriction of freedom of the press and the risk of political control of the new public broadcaster. The letter was accompanied by a public appeal, which reached up to 80 thousand signatures of citizens. See more at: <https://www.mojapeticia.sk/campaign/zastavme-unos-rtvs/1122f862-62d8-461b-b368-f1a5c4c3d026>

94 Constitutional Court (Slovak Republic), Resolution of 9 October 2024, No. PL. ÚS 10/2024

95 This governing model has been established by amendments to the Act on RTV Slovenia, and were implemented after the Constitutional Court had lifted, in May 2023, the temporary suspension of the amendments. The amendments to the Act on RTV Slovenija were adopted by the current government coalition in 2022 and were endorsed by majority of voters at a related referendum. Aiming at de-politicising the public service broadcaster's governing and management, the amendments mandated various independent institutions and organisations to appoint the governing body of RTV Slovenia.

A 17-member governing council composed of representatives of civil society and RTV Slovenia employees appoints the top management and oversees the public broadcaster's programming and finances. A new president of the management board, Natalija Gorščak was appointed in September 2024, with large support from the RTV Slovenia governing body.⁹⁶

That said, RTV Slovenia's management was in crisis mode in 2024 over the public broadcaster's financial situation. The 2025 annual programming and production plan drafted by the RTV Slovenia management in December 2024 has not yet reached the governing body for approval due to difficulties reconciling the programming and production plan with the financial plan, as required by the regulation.⁹⁷ RTV Slovenia is thus subject to temporary funding in proportion to last year's expenditures, until the financial deficit is addressed and the annual programming and production plan is approved by the governing body. The situation exists in part because the depoliticised governing model of RTV Slovenia wasn't

complemented by a sustainable and depoliticised funding model, with the amount of the monthly licence fee still up to the government – and thus a possible lever for political pressure.

The independence of public media in **Spain**, in particular Radiotelevisión Española, has been a recurring topic of debate that continued last year. Although some reforms to ensure its independence have been implemented, including a change in the process of electing the board of directors, concerns remain about the influence of political parties in its management. There has been a clear, decades-long pattern within Spain's two-party dynamic of the opposition demanding PSM's independence only to use it in a partisan way when they come to power.⁹⁸

The situation in **Sweden** is more encouraging, although challenges exist. PSM continue to uphold professional standards and enjoy a high degree of credibility. Recent studies show more than 70% of the population expressing trust in Sveriges Television and Sveriges Radio, compared to markedly lower levels of trust in

96 T. K. B., T. L. Š., B. R., *The new president of the RTV Slovenia board is Natalija Gorščak (Nova predsednica Uprave RTV Slovenija je Natalija Gorščak)*, rtvlo.si, 4 September 2024, <https://www.rtvlo.si/slovenija/nova-predsednica-uprave-rtv-slovenija-je-natalija-gorscak/719963>

97 Barbara Eržen, *RTV Slovenia enters the new year with temporary funding (RTV Slovenija v novo leto z začasnim financiranjem)*, delo.si, 28 December 2024, <https://www.delo.si/novice/slovenija/rtv-slovenija-v-novo-leto-z-zacasnim-financiranjem>

98 Cortes Generales (Spain), Royal Decree-Law 5/2024, of October 22, amending Law 17/2006, of June 5, on state-owned radio and television, to adopt urgent measures regarding the legal regime applicable to the RTVE Corporation (Real Decreto-ley 5/2024, de 22 de octubre, por el que se modifica la Ley 17/2006, de 5 de junio, de la radio y la televisión de titularidad estatal, para adoptar medidas urgentes relativas al régimen jurídico aplicable a la Corporación RTVE), Boletín Oficial del Estado núm. 256, 23 October 2024, https://www.boe.es/diario_boe/txt.php?id=BOE-A-2024-21699

private media outlets – generally ranging from 20% to 60%.⁹⁹ A key pillar of the country's PSM is their commitment to delivering pluralistic information.

Despite public service media's strong position in the eyes of the public and its continued professionalism, they face challenges. PSM are increasingly tasked with countering disinformation while struggling with rising operational costs. This comes against the backdrop of political discussions about its role between 2026 and 2033. The current parliamentary proposal calls for a modest budget increase: 3% for 2026, followed by a 2% increase each year from 2027 to 2030, and 1% annually from 2031 to 2033. However, PSM outlets have assessed that a greater increase is needed to maintain their current standards (3.5%, 3%, and 2.8%, respectively). Without this, public service may need to cut back on both journalists and programming, potentially weakening their ability to fulfill their mission in the future.

Independent media and telecommunications authorities and bodies

Media telecommunications authorities must remain impartial and consistent in their application of regulations and supervision of national media markets. To do so, they must

operate without influence from the government or other political actors, and they must be properly staffed and resourced. In multiple Member States, however, political influence pervades these bodies, often during the process of appointing the leadership of these bodies or their boards. In an especially disturbing development, 2024 saw a death threat made against the directors of one national media authority.

Media and telecommunications authorities in **Bulgaria** continue to struggle to protect media pluralism. The Council for Electronic Media (CEM) exemplifies this institutional fragility. Members of the CEM maintain political affiliations that negatively affect the body's impartiality and, ultimately, the editorial independence of public service media.¹⁰⁰ CEM members are directly appointed by Parliament and the President, compromising the council's independence. As of the close of 2024, ongoing political instability had halted legislative reforms needed to bring Bulgarian law into line with the European Media Freedom Act. Legislative updates are urgently needed to strengthen CEM's independence, modernise the regulatory framework, and improve the enforcement capabilities of oversight bodies.

The media regulator in **Croatia** is the Agency for Electronic Media (AEM). The current procedure for appointing members of the AEM is open to political influence as candidates are chosen by the government and approved by

99 Jesper Strömbäck, *Three major threats to Swedish public broadcasting – increasingly politically contested*, 2022, <https://osf.io/preprints/socarxiv/y9bva/download>

100 Reporters Without Borders, *Press Freedom Index: Bulgaria*, 2024, <https://rsf.org/en/country/bulgaria>

simple parliamentary majority.¹⁰¹ Calls by the Croatian Journalists' Association to reform the process have been ignored, with no action taken in 2024. Further criticism of the AEM focuses on its narrow interpretation of its powers, refusing jurisdiction in cases of hate speech in the media and ignoring numerous complaints in this area.¹⁰²

In August 2024, the directors of **France's** Regulatory Authority for Audiovisual and Digital Communication (ARCOM) received death threats. No reason was given, however, the newspaper *Libération* reported that “the threats could be linked to the decision not to renew the DTT frequency of the C8 channel announced a week before receiving this letter”.¹⁰³ The C8 channel, which belongs to the Canal+ group owned by Vincent Bolloré, has repeatedly come under fire for the often sexist and homophobic behaviour of a personality on its flagship programme *Touche Pas à Mon Poste*. ARCOM noted that the channel has been fined some €7.6 million over the past eight years.¹⁰⁴

In **Germany**, recent developments have led to concerns that the national regulator of

telecommunications will soon face severe resource challenges. The German Federal Network Agency (*Bundesnetzagentur*, BNetzA) has been designated as the German Digital Services Coordinator (DSC) under the Digital Services Act (DSA). However, the funding for this new role is still lacking, and only a third of the staff could be hired. In addition, the new department is still headed by the president of the BNetzA itself. While the president has some guarantees of independence, there are certain situations in which they can be relieved of office (Section 4, subsection 5 of the relevant law, the *Gesetz über die Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen*). This situation may worsen as the BNetzA will likely also become the main authority overseeing the coming Artificial Intelligence Act, thus stretching the agency's resources even thinner.

The National Council for Radio and Television (NCRTV) and the Hellenic Authority for Communication Security and Privacy (ADAΕ) serve as regulatory authorities for **Greece's** media landscape, and the independence of both have been questioned due to political influence over the appointment of their

101 European Federation of Journalists, *Croatia: Major challenges ahead to improve media freedom*, 25 September 2024, <https://europeanjournalists.org/blog/2024/09/25/croatia-major-challenges-ahead-to-improve-media-freedom/>

102 Paško Bilić; Antonija Petričušić, *Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European member states and in candidate countries in 2023. Country report : Croatia*, Centre for Media Pluralism and Media Freedom (CMPF), 2024, <https://cadmus.eui.eu/handle/1814/76996>

103 *Libération*, *Arcom directors faced with death threats (Les dirigeants de l'Arcom visés par des menaces de mort)*, 7 August 2024, https://www.liberation.fr/economie/medias/les-dirigeants-de-larcom-vises-par-des-menaces-de-mort-20240807_OPLZBNRJXJCM3MY2EXMSW76CUA/

104 Ibid.

members. NCRTV's members are selected by a parliamentary committee of which the ruling party holds a majority. Both the NCRTV and ADAE also reportedly face resource constraints, hindering the effectiveness of their oversight and enforcement of media regulations.¹⁰⁵ In this area and others, the EMFA has prompted discussions on reforming national media laws to align with EU standards. However, tangible changes in the regulatory framework have not been made, and improvements in media freedom remain elusive.¹⁰⁶

Although **Hungary's** National Media and Infocommunications Authority (NMHH) is formally regulated as an independent body, government influence is significant. The decisions of the authority often align with the views of the governing party, and the lack of meaningful audits regarding pro-government media further demonstrates their loyalty. The Media Council, the NMHH's oversight body, is also captured by the government. There was no significant improvement in 2024, and the passage into law of the European Media

Freedom Act did not induce new legislation; instead, Hungary was the only country to veto the regulation. The International Press Institute released a report on Hungary's adherence to the European Media Freedom Act, and while the existing legal framework guarantees the independence of public service media in theory, in practice, government interference is overt and unrelenting.¹⁰⁷

The independence and impartiality of **Malta's** national media regulator have been criticized in the past, and 2024 saw yet another example of this. In May 2024, the Civil Court, in its constitutional jurisdiction, ordered the Broadcasting Authority and PBS to pay compensation of €2,000 each after it found them guilty of violating the fundamental rights of the Nationalist Party.¹⁰⁸

On 21 June 2024, **Poland's** Ministry of Culture and National Heritage published for public consultation the draft outline of a bill to reform the country's PSM and implement changes to bring national law in line with the

105 Freedom House, *Country Overview – Greece, 2024*, <https://freedomhouse.org/country/greece/freedom-world/2024>

106 International Press Institute, *Media Capture Monitoring Report: Greece Measuring Compliance with the European Media Freedom Act*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>

107 International Press Institute, *Hungary Media Capture Monitoring Report*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Hungary-Media-Capture-Monitoring-Report-Final-1.pdf>

108 Matthew Agius, *Court says PBS, Broadcasting Authority breached PN's human rights after not airing Sofia inquiry parliament vote*, MaltaToday, 8 May 2024, https://www.maltatoday.com.mt/news/court_and_police/129072/court_says_pbs_broadcasting_authority_breached_pns_human_rights_after_not_airing_sofia_inquiry_parliament_vote

European Media Freedom Act.¹⁰⁹ The draft outline proposes several major changes, including restructuring the National Broadcasting Council – the national media market regulator – and revising the management of public television and radio channels, introducing competition rules for media market mergers through a media pluralism test, regulating the advertising practices of state-owned entities, enhancing transparency in media ownership structures, proscribing publishing by local authorities, and strengthening the protection of journalistic sources.

While the bill appears broad and includes a number of important reforms, feedback during the public consultation indicated concern that the bill would be unable to address some of the most severe threats to Poland's media regulatory framework. In recent years, these challenges have stemmed from the lack of political independence of the National Broadcasting Council. The draft outline proposes only modest changes, for example to the terms of its members and their eligibility criteria, and numerous NGOs and public institutions, including the country's Commissioner for Human Rights, have called for a more comprehensive overhaul of the appointment procedure, advocating for stronger guarantees of political pluralism and gender balance.¹¹⁰ Despite these concerns, the ministry has made no effort to reform the draft and does not appear intent on

doing so, considering the existing bill sufficient to prevent potential censorship through fines.

The public media authority in **Slovakia** is in a state of flux. Despite the government's overhaul of public service media, the country's supervisory body, the Council for Media Services, appears to have conducted itself in an impartial manner in 2024. In 2025, however, the government will be able to replace three members of the Council's board and appoint three more, out of a total of nine members. Even more concerning is the government's proposal to change the structure of the Council from collective decision making by the board to one where decision making is concentrated in the hands of the board's chair. The purview of the full board would then be limited to reviewing appeals against Council decisions. Such a restructuring will enable the government to directly influence the Council through one person – the chair – whom the government chooses, significantly compromising the remaining levels of independence.

The national supervisory body for the electronic communications market in **Slovenia**, the Agency for Communication Networks and Services (AKOS), is intended to function independent of the government. However, the appointment of the agency's director, the highest decision-making power, remains under direct control of the government. This

109 Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act)

110 See e.g. Apel organizacji społecznych do koncepcji wdrożenia EMFA, <https://siecobywatelska.pl/emfa-apel/>

constitutes one of the main threats to the independence of AKOS, along with the fact that the agency's council, the body supervising its work, is also appointed by the government. The council approves the agency's annual plans and reports and can propose the dismissal of the director.

Another issue that continued in 2024 is AKOS's lack of adequate resources, such that it is unable to fully enforce media regulation. The size of the agency's staff tasked with enforcing media regulations remains disproportionately small compared to the resources of similar media authorities in the EU. Moreover, despite the approval in 2024 of additional positions within the department that oversees media and information literacy, the size of the department, with 12 employees, remains insufficient.

Online media

Bulgaria lacks a robust regulatory framework for its online media ecosystem, leading to significant gaps in oversight, accountability, and sustainability. Current media laws do not address the unique challenges of online media, with online content regulation particularly insufficient. There are no national regulations in place to govern online media content, liability for digital platforms, or content aggregators. Mechanisms for moderating and removing

harmful content are weak, and self-regulation efforts have failed due to the lack of industry-wide participation and accountability, and the country remains extremely vulnerable to malicious disinformation attacks to sow division or influence election outcomes. By the close of 2024, Bulgaria had yet to appoint a designated Digital Services Coordinator, as required by the European Digital Services Act (DSA). Existing supervisory bodies lack the technical expertise, resources, and enforcement powers to effectively oversee digital services.

In 2024, the **Czech Republic** committed to digital transformation and proper regulation of the online media ecosystem by publishing the Czech Priorities for European Digital Policy 2024–2029.¹¹¹ This document includes strategies to safeguard internet freedom, promote transparency, and foster innovation in the digital space, while at the same time emphasising sustainable digital transformation aligned with human rights and democratic values. However, the Czech Republic still has no legal definition of online media or comprehensive legal framework in force for online media.

In 2024, the **Czech** Ministry of Industry and Trade approved a draft law on the digital economy to align with the EU Digital Services Act. The law includes content moderation rules designed to protect users from illegal content while safeguarding freedom of expression, and mechanisms for appeals and resolving

111 Digital Czechia (Digitální Česko), *Czech Priorities for European Digital Policy 2024–2029 (Priority České republiky pro evropskou digitální politiku 2024–2029)*, January 2024, https://digitalnicesko.gov.cz/media/files/FIN_Priorities-of-the-Czech-Republic-for-European-Digital-Policy_2page.pdf

out-of-court disputes fairly and transparently. The law is not in effect yet.¹¹² In November 2024, the Council for Radio and Television Broadcasting announced that internet content creators, such as YouTubers and influencers who publish videos for profit, must register with the council. This measure aims to align the country with the European Audiovisual Media Services Directive, focusing in particular on the protection of minors and the regulation of commercial communications.¹¹³

As of 2024, social media remains the number one news source for **Greeks** (61%), although the preferred platforms they use are changing. As a news source, Facebook is currently only used by 44% of Greeks who are online, down from 68% in 2016; Instagram and TikTok are the preferred platforms of 20% and 14% of Greeks, respectively, their highest levels.¹¹⁴

In February 2024, **Greece** enacted Law No. 5099/2024 to align with the EU Digital Services Act (DSA), introducing obligations for online platforms to manage content responsibly.¹¹⁵ While these measures aim to curb illegal content and misinformation, concerns have been raised about the potential for overreach and censorship, with critics arguing that vague criteria for content moderation could lead to arbitrary takedowns, stifling legitimate speech.¹¹⁶

In December 2024, **Greece** announced a national strategy to protect minors from internet addiction and social media misuse.¹¹⁷ While it was widely welcomed, there are concerns that it falls short of addressing the most pressing systemic issues. The strategy, which includes a dedicated website for parental control guidance, primarily focuses on individual user behavior and parental responsibility instead of

112 Ministry of Industry and Trade (Czech Republic), *Safer Online Environment: Government Approves the Draft Law on the Digital Economy (Bezpečnější online prostředí: Vláda schvaluje návrh zákona o digitální ekonomice)*, MPO, June 2024, <https://www.mpo.gov.cz/en/guidepost/for-the-media/press-releases/a-safer-online-environment--government-approves-the-draft-law-on-the-digital-economy---282797>

113 Mediaguru.cz, *YouTubers and Influencers Must Register with RRTV, Baxa Opposes (Youtuberi a influenceri se musí registrovat u RRTV, Baxa je proti)*, November 2024, <https://www.mediaguru.cz/clanky/2024/11/youtuberi-a-influenceri-se-musi-registrovat-u-rrtv-baxa-je-proti/>

114 Dr Antonis Kalogeropoulos, *Country Profile – Greece*, Reuters Institute, 17 June 2024, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/greece>

115 Lambadarios Law Firm, *Digital Services Act in Greece*, 26 April 2024, <https://www.lambadarioslaw.gr/2024/04/digital-services-act-in-greece/>

116 The Institute of International and European Affairs, *The Digital Services Act: Censorship Risks for Europe*, 18 December 2024, <https://www.iiea.com/publications/the-digital-services-act-censorship-risks-for-europe>

117 Ministry of Digital Governance, *Presentation of the National Strategy for the Protection of Minors from Internet Addiction (Παρουσίαση της Εθνικής Στρατηγικής Προστασίας των Ανηλίκων από τον Εθισμό στο Διαδίκτυο)*, 30 December 2024, <https://mindigital.gr/archives/7076>

root causes, such as exploitative algorithms and the lack of platform accountability.¹¹⁸

In **Hungary**, there are no major regulatory restrictions or safeguards for the online media ecosystem. Both independent media and government propaganda thrive, and influencers promoting messages that align with the ruling Fidesz party's narrative enjoy large followings.¹¹⁹ Megafon, the government-aligned company that manages most of these influencers, was founded to counter the so-called left-liberal content flooding social media, according to its founder. These influencers have a massive reach and their ads are supported by significant funding. In the first half of 2024, political ad spending in Hungary totaled HUF 4.151 billion (€10,368,000) on Facebook and Google, with government-aligned

spending on Facebook accounting for roughly half of this sum.¹²⁰

2024 was the first full year following the amendment of the Criminal Code decriminalising the conduct of journalists reporting on public-interest matters. According to the new legislation, communications related to public affairs cannot lead to criminal liability for defamation or libel if they are made in the media and are not intended to “manifestly and seriously harm the dignity of the victim”. The change was surprising, as the Fidesz party has deliberately worked to systematically block channels of free public debate since coming to power in 2010.¹²¹ However, a new draft law criminalising hateful comments was put forth in 2024.¹²² As it is written, especially with regard to its apparently broad application, there is great concern that it can potentially

118 Nomiki Vivliothiki, *Presentation of the National Strategy for the Protection of Minors from Internet Addiction*, 30 December 2024, <https://daily.nb.org/nomika-nea/i-ethniki-stratigiki-gia-tin-prostasia-ton-anilikon-apo-ton-ethismo-sto-diadiktyo/>

119 Civil Liberties Union for Europe: *Elections Monitoring Report 2024, Hungary*, November 2024, [liberties.eu, https://www.liberties.eu/f/wyxo01](https://www.liberties.eu/f/wyxo01)

120 Világi Máté, *At the European level, the government side spent record amounts on online advertisements during the election campaign (Európai szinten is rekordsokat költött netes reklámokra a kormányoldal a választási kampány során)*, Telex, 21 June 2024, <https://telex.hu/belfold/2024/06/21/internet-kampany-koltes-fidesz-valasztas-political-capital>

121 Hungarian Civil Liberties Union (TASZ): *TASZ welcomes the decriminalization of the free discussion of public affairs and calls attention to the government's further actions needed (A TASZ üdvözli a közügyek szabad megvitatásának dekriminalizációját és felhívja a figyelmet a kormány további teendőire)*, 26 April 2023, [https://tasz.hu/cikkek/a-tasz-udvozli-a-kozugyek-szabad-megvitasanak-kozelgo-dekriminalizaciojat-es-felhivja-a-figyelmet-a-kormany-tovabbi-teendoire/](https://tasz.hu/cikkek/a-tasz-udvozli-a-kozugyek-szabad-megvitasanak-dekriminalizaciojat-es-felhivja-a-figyelmet-a-kormany-tovabbi-teendoire/)

122 Dévai László, *This is truly about the possibility of ending up at the police station because of a harsh comment (Itt tényleg arról van szó, hogy egy durva komment miatt a rendőrségen köthetsz ki)*, Telex, 18 December 2024, <https://telex.hu/belfold/2024/12/18/online-agresszio-visszaszoritas-magyar-kormany-fidesz-torveny-komment-borton>

undermine freedom of expression. The intent seems to be not to punish actions or even the preparation of actions, but merely the expression of intentions or wishes.¹²³

Following the establishment of the Coimisiún na Meán,¹²⁴ the body began developing **Ireland's** binding Online Safety Code for content regulation. The Online Safety Code for video-sharing platforms was published in October 2024.¹²⁵

Regulation of the online ecosystem in **Malta** is insufficient and was largely unaddressed in 2024. Online newsrooms were the victims of multiple attacks. For instance, in June 2024, *MaltaToday* and *The Malta Independent* reported that they were victims of a scam website imitating them in an attempt to deceive individuals with a get-rich-quick scheme.¹²⁶ On 6 February 2024, the website of the Times of Malta was targeted with a Distributed

Denial-of-Service (DDoS) attack, which made the website temporarily inaccessible to readers. According to the newspaper, the motive of the attack was unclear, and no ransom request, data breach or other threats were reported. Although the newspaper's website has been targeted in the past, this was the largest attack it had experienced so far, and the outlet filed a formal complaint with the police.¹²⁷

The 2024 presidential elections in **Romania** exposed the significant threat of certain online media content, particularly on TikTok, with which politicians and their supporters were able to exploit the lack of initiative on the part of platforms to enforce rules on political content, account verification, political advertisements and the dissemination of information through manipulative means.¹²⁸ Civil society organisations have asked all responsible authorities to investigate any possible misuse of the platform and take actions to prevent such abuses

123 Joóó Sándor, *A new draft law proposes a one-year prison sentence for aggressive commenting (Egy év börtönnel büntetné az agresszív kommentelést egy új törvényjavaslat)*, Telex, 19 November 2024, <https://telex.hu/belfold/2024/11/19/internet-kommenteles-szabalyzat-nmhh-torvenyjavaslat-agresszio-halal>.

124 Leigh Mc Gowran, *Irish regulator seeks public feedback for Online Safety Code*, Silicon Republic, 11 July 2023 <https://www.siliconrepublic.com/business/online-safety-code-ireland-comisiun-na-mean-cnam>

125 Coimisiún na Meán (Ireland), *Coimisiún na Meán adopts final Online Safety Code*, 21 October 2024 <https://www.cnam.ie/coimisiun-na-mean-adopts-final-online-safety-code/>

126 Karl Azzopardi, *Scam websites posing as MaltaToday*, MaltaToday, 26 June 2024, https://www.maltatoday.com.mt/announcements/announcements/129932/scam_websites_posing_as_maltatoday. The Malta Independent, *TMI website spoofed*, The Malta Independent, 26 June 2024, <https://www.independent.com.mt/articles/2024-06-26/local-news/TMI-website-spoofed-6736262256>

127 Times of Malta, *Times of Malta targeted in major DDoS cyberattack*, Times of Malta, 6 February 2024, <https://timesofmalta.com/article/times-malta-targeted-major-ddos-cyberattack.1082274>

128 Expert Forum, *Tik Tok in Times of crisis*, Analysis Report 1 December 2024, <https://expertforum.ro/tiktok-in-timp-de-criza-episodul-ii/>

from occurring¹²⁹ but argued against blocking TikTok in Romania, as several politicians have suggested.¹³⁰ The European Commission declared it opened formal proceedings against TikTok on election risks under the Digital Services Act.¹³¹

Romania adopted a law implementing the Digital Services Act in March 2024, and the National Authority for Communications Administration and Regulation (ANCOM) was designated as the country's digital services coordinator.¹³² Civil society organisations have argued that several of ANCOM's draft decisions, in its capacity as digital services coordinator, maintained an overly technical approach that lacked a human rights impact assessment,

as well as adequate consultation with CSOs to ensure the proper protection of human rights. Such a practice will invariably lead to decisions that limit fundamental rights, in particular freedom of expression.¹³³

Although existing laws and practices continue to facilitate a generally healthy, well-functioning online media ecosystem, **Sweden** has experienced a sharp increase in polarisation. Threats and harassment against journalists continue to rise, with one recent study revealing that nearly 30% of Sweden's journalists faced threats, and around 70% received disparaging comments.¹³⁴ This is especially true of women journalists, with two out of three having been subjected to hateful comments.¹³⁵

129 ApTI, *The TikTok network - a catalyst for extremist views and electoral malpractice. Do we have a democratic process through the DSA?*, press-release signed by 20 NGOs, 26 November 2024, <https://www.apti.ro/content/re%C8%9Beaua-tiktok-catalizator-al-opiniilor-extremiste-%C8%99i-al-nerespect%C4%83rii-regulilor-electorale>

130 ApTI, *ANCOM does not and cannot block TikTok!*, press-release signed by 20 NGOs, 28 November 2024, <https://www.apti.ro/content/ancom-nu-blocheaza-si-nu-poate-bloca-tiktok>

131 Press release of the European Commission, *Commission opens formal proceedings against TikTok on election risks under the Digital Services Act*, 17 December 2024, https://ec.europa.eu/commission/presscorner/detail/en/ip_24_6487

132 Romania, Law No. 50 of 18 March 2024 on establishing measures for the application of Regulation (EU) 2022/2.065 of the European Parliament and of the Council of 19 October 2022 on a single market for digital services and amending Directive 2000/31/EC (Digital Services Regulation), as well as amending and supplementing Law No. 365/2002 on electronic commerce (*Lege nr. 50 din 18 martie 2024 privind stabilirea unor măsuri pentru aplicarea Regulamentului (UE) 2022/2.065 al Parlamentului European și al Consiliului din 19 octombrie 2022 privind o piață unică pentru serviciile digitale și de modificare a Directivei 2000/31/CE (Regulamentul privind serviciile digitale), precum și pentru modificarea și completarea Legii nr. 365/2002 privind comerțul electronic*)

133 ApTI, *What ANCOM is doing with the DSA: Internet police or a safe and reliable online environment by respecting fundamental rights?*, press-release, 3 April 2024, <https://www.apti.ro/ce-face-ancomul-cu-dsaul-politia-internetului-sau-un-mediu-online-sigur-si-fiabil>

134 Journalistförbundet, *Hot och hat mot journalister*, 22 March 2024, <https://www.sjf.se/yrkesfragor/yttrandefrihet/hot-och-hat-mot-journalister>;

135 Ibid.

A survey by the Swedish Union of Journalists found that a remarkable 39% of journalists reported practicing some form of self-censorship to avoid online hate and threats, and 48% stated that they had adjusted their reporting for the same reasons.¹³⁶ In May 2024, the private TV channel TV4 revealed that one of the country's largest parties, the Sweden Democrats – who support the government – ran a troll farm to anonymously smear members of the opposition, as well as the government parties they work with.¹³⁷ Following the revelation, party leader Jimmie Åkesson claimed it was “a major influence operation from the left-liberal establishment.”¹³⁸ He also accused his political opponents of trying to sabotage the Sweden Democrats ahead of the EU election.

Public trust in media

Public trust in **Bulgarian** media has continued to deteriorate in recent years. According to the 2024 Reuters Institute Digital News Report, only 28% of Bulgarians trust journalists, a significant drop from 35% in the previous

study.¹³⁹ This places the country 41st out of 46 countries in the survey. With 64% of citizens saying they are deeply skeptical of journalists, Bulgaria shares – with Slovakia – the highest media distrust rating in Eastern Europe.

A decline is also observed in **Croatia**, where public trust in media went down by 2% in 2024 (to 32%, from 34% in 2023). Croatians trust private television stations with a national frequency the most (Nova TV – 65% and RTL – 61%), while the national public television broadcaster is trusted by 52% of citizens. Citizens generally trust television stations more than print and online media, with print media being the least turned-to medium for information (20%).¹⁴⁰

This trend continued in the **Czech Republic**, although 2024 saw a slight uptick in public trust: according to the Digital News Report 2024 by the Reuters Institute, 31% of Czechs expressed trust in the news, up from 30% in 2023. This places the Czech Republic below the global average in media trust, a position the report attributes to factors such as perceived

136 Annika Hirvonen (MP) Interpellation, *Hot och trakasserier mot journalister och forskare*, 2024, https://www.riksdagen.se/sv/dokument-och-lagar/dokument/interpellation/hot-och-trakasserier-mot-journalister-och-forskare_hc10130/

137 Kalla fakta, *Undercover i trollfabriken*, 7 May 2024, <https://www.tv4.se/artikel/2VCWExxK0L1Xmai2Y60Z2/kalla-fakta-avsloelar-sd-driver-en-trollfabrik>

138 Miranda Olsson, *Åkesson om Kalla faktas avslöjande: “Påverkansoperation”*, Altinget, 14 May 2024, <https://www.altinget.se/artikel/kalla-fakta-sd-konton-haanar-partiledare-i-tidosamarbetet>

139 Reuters Institute & University of Oxford, *Digital News Report for 2024: Bulgaria*, 2024, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/bulgaria>

140 Zrinjka Peruško, *Croatia*, Reuters Institute Digital News Report 2024, Reuters Institute for the Study of Journalism, 17 June 2024, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/croatia>

political bias and sensationalism, particularly among commercial media outlets.¹⁴¹ A survey by the Czech Academy of Sciences' Center for Public Opinion Research found that trust in public service media in the summer of 2024 was higher than trust in commercial outlets.¹⁴²

The situation appears much better in **Estonia**. According to the government's latest public opinion survey, Estonians trust native-language television and radio channels the most, with 80% expressing trust, followed by national Estonian-language newspapers and news portals, trusted by 75%. Trust in Western media is significantly higher among Estonians than among residents of other ethnic backgrounds, at 47% and 26%, respectively.¹⁴³

There is also a promising trend observed in **France**, both in terms of media literacy and interest in the news. According to the La Croix-Kantar barometer¹⁴⁴ on people's confidence in the media, 62% of French citizens

agree "that we should be cautious of what the media says about major current affairs" – a 5% increase since 2022. Encouragingly, 74% of citizens aged 18 to 24 show a great interest in news, compared to just 61% in November 2023, a remarkable year-on-year increase of 14 points.

There are also comparatively high levels of trust in media observed in **Germany**, especially for public service media: 64% of respondents to the 2023 Mainz Longitudinal Study on Media Trust said they find public service television very or somewhat trustworthy.¹⁴⁵ However, whereas 49% of respondents expressed confidence in the media on important issues in 2022, this number fell to 44% in 2023 – while the proportion of those who distrust the media increased from 20% to 25%. The same study also highlighted the concerning trends of ever-increasing levels of media cynicism since 2020. Notably, 23% of respondents agreed to some extent with the statement that

141 Reuters Institute, *Digital News Report 2024: Czech Republic*, June 2024, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/czech-republic>.

142 Centrum pro výzkum veřejného mínění (CVVM), *Trust in Selected Institutions of Public Life and Interpersonal Trust – Summer 2024* (Důvěra k vybraným institucím veřejného života a mezilidská důvěra – léto 2024), September 2024, <https://cvvm.soc.cas.cz/cz/tiskove-zpravy/politicke/politicke-ostatni/5870-duvera-k-vybranim-institucim-verejneho-zivota-a-mezilidska-duvera---leto-2024>.

143 Government Office (Riigikantselei), *Avaliku arvamus seireuring*, June 2024, https://www.riigikantselei.ee/uuringud?view_instance=0¤t_page=1

144 Maude Guilbeault, (*Media Barometer 2025: misinformation, fatigue, confidence... Our survey in 8 key figures*), *Baromètre des médias 2025 : désinformation, fatigue, confiance... Notre sondage en 8 chiffres clés*, La Croix, 14 January 2025, <https://www.la-croix.com/culture/barometre-des-medias-2025-desinformation-fatigue-confiance-notre-sondage-en-8-chiffres-cles-20250114>

145 Kai Remen, Michaela Waldow, *Wie sich das Vertrauen in Medien verändert*, ZDF, 17 April 2024, <https://www.zdf.de/nachrichten/panorama/medien-vertrauen-studie-universitaet-mainz-100.html>

“established media and politics work hand in hand to manipulate public opinion”.¹⁴⁶

Public trust in the media in **Greece** remains low across print, radio and television platforms, for both public service and commercial media. The 2024 Digital News Report by the Reuters Institute found that a mere 23% of Greeks express trust in news overall, positioning Greece at the bottom of the 47 surveyed markets. High levels of distrust were observed across all demographic groups, but it is particularly pronounced among younger people and those who identify as politically left-leaning. Local and regional news outlets tend to garner more trust than the country’s national media outlets.¹⁴⁷

A survey conducted by the Committee for Editorial Independence, published earlier this year, found that of the Visegrad Four countries, **Hungarians** have the lowest levels of trust in their media, with an increasing number of

Fidesz voters (33%) expressing concern about the state of public service media.¹⁴⁸ Conversely, according to the latest representative survey, performed in October 2024,¹⁴⁹ public service media in **Lithuania**, such as Lithuanian National Radio and Television (LRT), enjoy relatively high levels of trust (29% of citizens express trust in them) compared to commercial outlets, while trust in influencers is particularly low, with only 3-8% of citizens expressing confidence in these platforms, largely due to concerns about biased or promotional content. Trust in the media is hindered by concerns over political bias, sensationalism, and the growing influence of unregulated digital content. Strengthening editorial independence and promoting media literacy could help address these challenges and improve public confidence in the media ecosystem.

Public trust in media in **Latvia** was comparatively high in 2024 and showed slight improvement from 2023, according to a survey¹⁵⁰ on

146 Oliver Quiring et al., *Mainzer Langzeitstudie Medienvertrauen 2023*, September 2024, https://medienvertrauen.uni-mainz.de/files/2024/04/Mainzer_Langzeitstudie_Medienvertrauen_2023.pdf

147 Reuters Institute, *Country Profile – Greece, 2024*, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/greece>.

148 Buggyinszki György, *Visegrad Survey on Media Freedom and Trust in Public Media (Visegrádi felmérés a médiaszabadságról és a közmédiára iránti bizalomról)*, Media1, 26 April 2024, <https://media1.hu/2024/04/26/visegradi-felmeres-mediaszabadsag-kozmedia-bizalom/>

149 *Trust in information sources: Lithuanians trust “Google” and national media the most, meanwhile influencers are trust the least (Pasitikėjimas informacijos šaltiniais: lietuviai labiausiai pasitiki „Google“ ir nacionaline žiniasklaida, mažiausiai – nuomonės formuotojais)*, Delfi, 24 October 2024, <https://www.delfi.lt/m360/naujausi-straipsniai/pasitikejimas-informacijos-saltiniais-lietuviai-labiausiai-pasitiki-google-ir-nacionaline-ziniasklaida-maziausiai-nuomones-formuotojais-120059686>

150 Quantitative features: 1559 respondents over 15, personal interviews and qualitative survey 70 respondents, 9 and older

Media Literacy of the Latvian Population¹⁵¹ commissioned by the National Electronic Mass Media Council. It revealed that 31.7% of the respondents find the news media fully or predominantly credible, 47.8% believe it to be partially credible, and 20.5% believe public media to be predominantly not credible or not credible at all. However, trust in public media is low among respondents from a minority background, with 14.1% believing public service media to be fully or predominantly credible, 47.9% saying it is only partially credible, and 36.4% finding it predominantly not credible or not credible at all.

According to the most recent Eurobarometer study, trust in **Malta's** written press remains the lowest in Europe, 20 percentage points lower than the EU average.¹⁵² The number of people who trust the written press has risen by 12 percentage points since the spring, to 40%. Trust in radio and TV fare better, at 46% and 50%, respectively, while trust in websites is low, at 38%, compared to the European average of 43%. Trust in social networks is lower still, at 21%, against a European average of 31%.

According to research conducted by Closer News,¹⁵³ **Dutch** citizens strongly believe in the importance of independent journalism, with 76% of people considering it vital. The same research found that 36% believe news media are generally influenced or controlled by foreign actors. Overall, 48% say they have a lot of confidence in the media in general, while 17% do not have any confidence in regular news sources. The research also found that 40% of people say their trust in the media has decreased. Research by the Dutch Media Authority shows a similar trend: although trust in media is fairly high, with 54% of Dutch people trusting the news they receive via television, social media, newspapers or radio, this trust is dropping: since 2018, the share of people who do not trust the news has increased from 11% to 19%.¹⁵⁴

A survey from March 2024 shows that 43% of **Romanians** consider social media the most likely source of information to contain disinformation, while 37.9% say it is TV stations, 5.2% newspapers and magazines, and 1.2% believe radio stations contain the most disinformation. When asked to what extent they believe they

151 Civitta, *Pētījums par Latvijas iedzīvotāju medijpratību*, 2024, <https://www.neplp.lv/lv/media/8772/download?attachment>

152 Neville Borg, *Most people don't trust political parties or the government: Eurobarometer*, Times of Malta, 30 November 2024, <https://timesofmalta.com/article/most-people-don-t-trust-political-parties-government-eurobarometer.1101777>

153 Dichterbij Nieuws, *News Literacy Research Report (Nieuwswijsheid Onderzoeksrapportage)*, April 2024, <https://netwerkmediawijsheid.nl/wp-content/uploads/2024/04/DBN-onderzoeksrapport-4.pdf>

154 Commissariaat voor de Media (Netherlands), *Young People, News and Social Media: A Glimpse into the Future of News (Jongeren, nieuws en sociale media: Een blik op de toekomst van het nieuws)*, 1 October 2024, <https://www.cvdm.nl/nieuws/onderzoeksrapport-jongeren-nieuws-en-sociale-media-een-blik-op-de-toekomst-van-het-nieuws/>

have been exposed to disinformation on any channel in recent months, 17.4% of respondents say they have to a very large extent, 28.3% to a large extent, 28.6% to a small extent, and 22.7% to a very small extent or not at all.

Perhaps in part because of the current government's overt attacks on the media, public trust in the media is alarmingly low in **Slovakia**. According to the Reuters Institute Digital News Report 2024,¹⁵⁵ the overall trust in the media in Slovakia is only 25% – the lowest level ever observed in the eight years of the survey. The situation is markedly different in **Slovenia**, where public opinion research conducted by Valicon in October 2024 once again revealed positive trends regarding trust in the public service broadcaster RTV Slovenija. The last opinion poll shows that trust increased by 3 points compared to the October 2023 poll, and by 6 points compared to the March 2024 poll.¹⁵⁶

According to the Reuters Institute's Digital News Report 2024, trust in news in **Spain** remains low, with only 33% of respondents regularly trusting it, while 39% express distrust. In addition, the report indicates that 44% feel overwhelmed by the amount of news, significantly more than the 26% observed in 2019.

155 Nic Newman et al., *Reuters Institute Digital News Report 2024*, pg. 102-103, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2024-06/RISJ_DNR_2024_Digital_v10%20lr.pdf

156 For more information see Valicon website with poll results at <https://www.valicon.net/sl/2024/11/valicon-ogledalo-slovenije-jesen-2024/>.

Safety and protection of journalists

Key findings

- Harassment, threats and physical attacks against journalists were common across Europe in 2024. Protests and other public demonstrations are often the site of abuse and attacks, with inadequate police protection of journalists.
- Instances of violence against journalists at the hands of the police were observed in multiple Member States last year, and it remains the case that some police forces are not trained to properly protect journalists, especially during public functions, and lack the resources to do so anyway.
- Abusive lawsuits known as SLAPPs remain a pervasive and potentially existential threat to journalists. Only one Member State has transposed the EU Anti-SLAPP Directive, which does not address purely domestic SLAPP cases.
- Women journalists continue to be disproportionately targeted with abuse.

Attacks against journalists, including online harassment

Attacks on journalists, both physically and in the form of harassment, continue to be a significant problem across EU Member States. The Media Freedom Rapid Response counted 156 physical attacks against journalists in EU member states in 2024, out of which 64 resulted in physical injuries. Additionally, it counted 391 cases of verbal attacks against media professionals.¹⁵⁷ These kinds of attacks have real consequences for the way journalists conduct their work, e.g. journalists from German local newspapers are reporting self-censorship and not touching certain topics due to fears of attacks.¹⁵⁸ And while the majority of attacks might come from ‘ordinary’ individuals, media professionals often fall victim to attacks and smear campaigns from government or public officials.

In light of the super-election year 2024, verbal abuse and harassment against journalists intensified in **Croatia**. The goal often was to put political pressure on news outlets. In the first half of 2024, five out of the seven

157 Media Freedom Rapid Response, *Mapping Media freedom Monitoring Report 2024*, 2025, <https://www.ecpmf.eu/wp-content/uploads/2025/02/Monitoring-Report-2024.pdf>

158 Patrick Peltz, *Blind Spots: How self-censorships impacts local journalism in Germany*, 9 July 2024, <https://www.ecpmf.eu/blind-spots-how-self-censorship-impacts-local-journalism-in-germany/>

incidents reported by the Media Freedom Rapid Response Monitor were committed by a member of the government or a public official.¹⁵⁹ Croatian Prime Minister Andrej Plenković in particular attacked journalists and media. When journalists reported about the new State Attorney General's and the Minister of Culture and Media's scandals, Plenković accused them of sharing classified information and being corrupt.¹⁶⁰

Attacks against Croatian journalists also became physical. Melita Vrsaljko, a journalist for Faktograf and Klimatski portal, was attacked twice in one day in July 2024 while working in the village of Nadin. An elderly man attacked her on public property when she was passing an emerging illegal dump. Later the same day, she was attacked at her own home in Nadin by the daughter of the initial attacker. After opening the door, the woman started hitting Vrsaljko and attempted to take her mobile phone. The attackers are the sister and the father of the powerful local politician Darion Vrsaljko.¹⁶¹

Threats against journalists in exile are a problem in the **Czech Republic**, where incidents of online harassment and threats against Russian journalists were reported. They faced intimidation, raising concerns about their safety.¹⁶² On 20 March 2024, the Safety of Journalists Platform published a letter for Czech and European authorities voicing their concerns over the safety of Alesya Marokhovskaya and Irina Dolinia of IStories, who were being threatened by probable Russian state agents.¹⁶³ Both journalists moved to Prague to continue their work of reporting on the Russian-Ukrainian war and operations of the Russian state. They have been victimised by death threats from suspected Russian agents who know where they live, stalk them and were able to track their flight bookings. While the Prague Police did open an investigation, the case was closed for a lack of evidence.

Due to a decline in demonstrations against Covid-19 measures and right-wing extremist demonstrations, the number of physical attacks against journalists in **Germany** declined,

159 Media Freedom Rapid Response, *Mapping Media Freedom Monitoring Report January - June 2024*, 2024, <https://www.mappingmediafreedom.org/analysis/>.

160 Croatian Journalists' Association, *CJA calls on Prime Minister Plenković to stop attacking journalists (HND poziva premijera Plenkovića da prestane napadati novinare)*, 28 February 2024, <https://www.hnd.hr/hnd-poziva-premijera-plenkovica-da-prestane-napadati-novinare>.

161 Metamorphosis Foundation, *Fact-Checkers condemn physical attack against journalist of Croatian fact-checking service Faktograf*, 24 July 2024, <https://globalvoices.org/2024/07/24/fact-checkers-condemn-physical-attack-against-journalist-of-croatian-fact-checking-service-faktograf/>

162 Association of European Journalists (AEJ), *AEJ Warns of Threats to Exiled Russian Journalists in the Czech Republic*, March 2024, <https://aej-uk.org/2024/03/21/aej-warns-of-threat-to-exiled-russian-journalists-in-czech-republic>

163 International Press Institute, *Appeal: protect exiled Russian journalists in the Czech Republic*, 20 March 2024, <https://ipi.media/appeal-protect-exiled-russian-journalists-in-the-czech-republic/>

dropping from 103 in 2023 to 41 recorded attacks in 2024. However, while this might give room for hope, the number is still almost three times higher than in 2019.¹⁶⁴ A day after an extremist attack on the Christmas market in Magdeburg in December 2024, journalists were attacked by extreme right-wing protestors. The case also showed a complete failure of the police to protect the media professionals. Journalists had approached the police to explicitly ask for protection against bodily harm, which the police told them they would provide. For that, journalists were supposed to stay close to them. Just 15 minutes later, however, the policeman told the journalists to leave and return to an assigned space at another point of the square. While there were many right-wing extremists present, so were some police, who left a few minutes later, leaving the journalists alone among the extreme-right protestors. The police did not intervene when a journalist had his phone slapped from his hands and neo-Nazis were playing football with the device.¹⁶⁵

In **Greece**, journalists faced several incidents of verbal and physical attacks. While reporting on a fire in a suburb of Athens, Frixos Drakontidis, the editor-in-chief of Alpha TV in Athens, was first approached and then asked to leave the spot by an unidentified man. The interaction led to a physical confrontation, during which Drakontidis was punched multiple times and pushed to the ground.¹⁶⁶

At the same time, journalists in **Ireland** who cover violent protests at sites of planned accommodation for people seeking international protection have been subject to threats,¹⁶⁷ as have journalists covering legal cases related to these protests.¹⁶⁸ RTÉ journalist Barry O’Kelly was prevented from doing his job at two different demonstrations. In April 2024, he was trying to film a far-right protest outside a building in the town of Tallaght, which the protestors claimed would be used to house asylum seekers. When O’Kelly arrived at the scene, a group of far-right demonstrators began assaulting him, resulting in O’Kelly ultimately having to stop

164 Reporters Without Borders, *Nahaufnahme Deutschland*, 2024, https://www.reporter-ohne-grenzen.de/fileadmin/Redaktion/Downloads/RSF_Nahaufnahme_Deutschland_2024.pdf

165 Sebastian Leber, *Allein gelassen mit Neonazis: Wie die Polizei in Magdeburg Journalisten grob gefährdete*, 01 January 2025, <https://www.tagesspiegel.de/gesellschaft/allein-gelassen-mit-neonazis-wie-die-polizei-in-magdeburg-journalisten-grob-gefahrdete-12940342.html>

166 Committee to Protect Journalists, *Greek journalist beaten on air while reporting from Athens fire*, 10 July 2024, <https://cpj.org/2024/07/greek-journalist-beaten-on-air-while-reporting-from-athens-fire/>.

167 Riona Maguire, *‘Horrificed’ Gardai probe threats made to journalist covering Coolock disturbances as attempts made to find home address & car*, The Irish Sun, 19 July 2024, <https://www.thesun.ie/news/13442543/gardai-probe-threats-made-journalist-coolock/> Mapping Media Freedom, *RTÉ journalist Barry O’Kelly constantly prevented from filming protest against asylum seekers’ plans*, 31 May 2024, <https://www.mapmf.org/alert/31602>

168 National Union of Journalists, *NUJ condemns vile abuse of reporter*, 19 July 2024, <https://www.nuj.org.uk/resource/nuj-condemns-vile-abuse-of-reporter.html>

recording.¹⁶⁹ Almost two months later, O’Kelly found himself in a similar situation while covering the demonstration ‘Newtown says no’ in the town of Newtown Mount Kennedy. While covering a protest against the government’s plans to house asylum seekers, two protestors approached the journalist before waving the Irish flag in front of his camera to prevent him from filming.¹⁷⁰

In **Italy**, more than 130 attacks on journalists were reported on the Mapping Media Freedom Platform in 2024.¹⁷¹ One of them was Andrea Joly, who, on 20 July 2024, was attacked by neo-fascists in Turin. Joly was passing a party hosted by the neo-fascist group CasaPound when he saw smoke bombs and fireworks going off and decided to record the scene on his phone. Shortly after, he was approached by two men from the party, who asked him who he was and demanded that Joly hands over his phone. When the journalist tried to leave, the men started kicking him, causing injuries

which later had to be treated in hospital. The President of the Italian Senate, Ignazio La Russa, condemned the attack but also said the journalist should have identified himself, and questioned whether Joly’s presence at the scene was really a coincidence.¹⁷²

The governing party in **Malta** continues to foster a hostile environment against journalists, with the Prime Minister and other public officials attacking journalists for simply doing their job. In May, Prime Minister Abela accused journalists and their outlets of working for the so-called “establishment”. The Institute of Maltese Journalists had to issue two statements, as Abela was “clearly implying that they are enemies of the state and the people.”¹⁷³ Journalists covering protests against the war in Gaza found themselves in situations threatening their safety in the Netherlands. During protests at the University of Amsterdam in May, several journalists were threatened, attacked and intimidated.¹⁷⁴

169 Mapping Media Freedom, *RTÉ investigative reporter prevented from filming far-right demonstration*, 4 April 2024, <https://www.mapmf.org/alert/31385>

170 Mapping Media Freedom, *RTÉ journalist Barry O’Kelly constantly prevented from filming protest against asylum seekers’ plans*, 31 May 2024, <https://www.mapmf.org/alert/31602>

171 European Centre for Press and Media Freedom, *Mapping Media Freedom, 2024*, <https://www.mapmf.org/explorer?f.from=2024-01-01&f.to=2024-11-18&f.country=Italy>

172 Elena Giordano, *“I was afraid of being strangled”: Italian journalist speaks out after attack by neofascists*, 22 July 2024, <https://www.politico.eu/article/italy-journalist-attacked-neofascist-group-casapound/>

173 The Malta Independent, *IGM condemns PM’s comments implying journalists ‘are enemies of the State and of the people’*, The Malta Independent, 7 May 2024, <https://www.independent.com.mt/articles/2024-05-07/local-news/IGM-condemns-PM-s-comments-implying-journalists-are-enemies-of-the-State-and-of-the-people-6736260868>

174 Nederlandse Vereniging van Journalisten (NVJ), *Protestors Must Leave Journalists Alone, UvA Demonstration (Demonstranten UvA blijf van journalisten af)*, 8 May 2024, <https://www.nvj.nl/nieuws/nvj-%E2%80%98demonstranten-uva-blijf-journalisten-af%E2%80%99>

There have also been developments since last year's report in another case that has been ongoing in **Malta** for years. The trial of two men charged with supplying the bomb that was used to kill Daphne Caruana on 16 October 2017, opened in Valletta, Malta, on 24 April 2025. One hitman pleaded guilty in 2021 and is a state witness. Two other hitmen pleaded guilty in 2022, while the middleman was granted a presidential pardon in 2019 and is a state witness. The alleged mastermind of the assassination was granted bail in January 2025. The 2021 report of the public inquiry into Daphne's assassination cited impunity as one of the factors enabling Daphne's killing. Four years later, most of the report's recommendations have yet to be implemented.

After the annulled 2024 elections in **Romania**, where a far-right candidate received a surprisingly high number of votes, supporters of

the candidate started smear campaigns against journalists reporting about possible Russian election interference. They claimed to have a database containing the journalists' personal information and that their activities were being monitored. The threat was made that journalists should "stop while they still have the chance". The threats are being investigated by the police.¹⁷⁵ A TV host received death threats made against his children,¹⁷⁶ while an online influencer made insulting comments about the wife of another TV presenter.¹⁷⁷

The number of attacks and threats against journalists in **Slovakia** increased, often coming from government politicians. Threats are often linked to investigative reports about corruption or organised crime. The Prime Minister frequently calls mainstream journalists liars at press conferences.¹⁷⁸

175 ActiveWatch, *Supporters of candidate Călin Georgescu, mafia threats against SNOOP journalists*, press-release, 4 December 2024, <https://activewatch.ro/articole/sus%C8%9Bin%C4%83tori-ai-candidatului-c%C4%83lin-georgescu-amenin%C8%9B%C4%83ri-mafiotela-adresa-jurnali%C8%99tilor-snoop/>

176 Dragos Patraru, *Dragoș Pătraru threatened with death*, Starea Natiei YouTube channel, 3 December 2024, https://www.youtube.com/watch?v=0ojvauds3TQ&ab_channel=StareaNatieiOficial

177 Otilia Cristea, *Attacks on journalists are on the rise. Makaveli, the influencer who supported Georgescu, suburban language against Mihai Gâdea's wife*, Hotnews, 16 December 2024, <https://hotnews.ro/se-inmultesc-atacurile-la-adresa-jurnalistilor-makaveli-influencerul-care-l-a-sustinut-pe-georgescu-limbaj-suburban-la-adresa-sotiei-lui-mihai-gadea-1862529>

178 For example, at the press conference of the ruling coalition parties held on 3 December 2024, the prime minister Fico accused the mainstream journalists of lying and called on the public to stop believing the media. See e.g. Peter Dlhopolec, *Primitive premier blows up at media*, The Slovak Spectator, 3 December 2024, <https://spectator.sme.sk/politics-and-society/c/robert-fico-meltdown-media-slovakia>. Another example, in October 2024, Fico called reporters "bloodthirsty bastards" and said they are "possessed by the devil". The Committee to Protect Journalists, *Slovak PM Fico attacks journalists as "possessed by the devil"*, 11 October 2024, <https://cpj.org/2024/10/slovak-pm-fico-attacks-journalists-as-possessed-by-the-devil/>

In **Slovenia**, the online platform Report Attack, coordinated by the Slovenian Association of Journalists, showed a decline in attacks against journalists. While 15 such attacks were recorded in 2023, the number dropped to 10 in 2024.¹⁷⁹ When attacks occurred, they often did so at the site of protests. Gašper Lešnik, a photographer for the magazine *Mladina*, was attacked in December 2024 by supporters of the Pensioner's Voice Party at one of their protests against the current government. A participant of the protests grabbed Lešnik's camera strap and urged him to delete photos, refusing to let him go until police intervened.¹⁸⁰

In **Sweden**, according to a 2024 study by the Swedish Union of Journalists (Journalistförbundet), 30% of asked journalists reported facing threats while around 70% received disparaging comments.¹⁸¹ As a result, a worrying 39% of journalists said in the study that they self-censor in order to avoid hatred and threats.¹⁸² The issue affects domestic, as well as exiled journalists working in Sweden. Ahmet Dönmez, a Turkish journalist who had reported on corruption in Turkey, moved to

the United States in the fall of 2024 as a result of feeling unsafe.¹⁸³

Law enforcement capacity to investigate attacks on journalists

Bulgaria does not offer sufficient protection of the safety and independence of journalists, leaving them vulnerable to threats, harassment and restricted access to information. There is no centralised system for reporting violence against media professionals, and institutional response to attacks is lacking.

In 2024, the case of the **Greek** crime journalist Giorgos Karaivaz, who was fatally shot in 2021, went to trial. In July, however, the two brothers accused of the murder were acquitted due to insufficient evidence. The court's decision has drawn widespread criticism by international press freedom organisations. Reporters without Borders expressed deep concerns over the result of the case, emphasizing the need for thorough investigations to bring

179 For more information see the 'Report attack' website at <https://novinar.com/prijavi-napad/>.

180 Luka Volk, *Napad na fotoreporterja Mladine*, mladina.si, 27 December 2024, <https://www.mladina.si/237544/napad-na-fotoreporterja-mladine/>.

181 Journalistförbundet, *Hot och hat mot journalister*, 22 March 2024, <https://www.sjf.se/yrkesfragor/yttrandefrihet/hot-och-hat-mot-journalister>;

182 Ibid.

183 Kurdo Baksi, *Förföljd journalisten har flyttats till USA – "Jag känner mig inte trygg i Sverige"*, Journalisten, 28 August 2024, <https://www.journalisten.se/nyheter/forfoljd-reporter-har-flyttat-till-usa-jag-kanner-mig-inte-trygg-i-sverige/>.

the perpetrators and the people who ordered the crime to justice.¹⁸⁴ The acquittal has also intensified calls for better protection of journalists and for Greek authorities to ensure that attacks against media professionals are met with accountability.

In February, the government in **Slovakia** passed a new and controversial reform of the Criminal Code. The reform not only significantly reduced penalties and the statute of limitations for serious crimes, it also abolished the Special Prosecutor's Office.¹⁸⁵ Amongst others, the Special Prosecutor's Office was responsible for dealing with the killings of Slovak journalist Ján Kuciak and his fiancée Martina Kušnírová in 2018, who were shot at their home. The move raises serious concerns for the future of the prosecution and convictions of those responsible for the assassinations.

Despite the closure of the Prosecutor's Office, a Slovak prosecutor decided to reopen the case of the deepfake audio of journalist Monika Tódová, which was circulated in September shortly before the parliamentary elections, allegedly revealing the journalist and the leader of the Slovak Progressive Party preparing electoral fraud. Due to the decision to reopen the investigation, Tódová was able to testify in March. The police had initially refused to open an investigation, claiming the Slovak public would not be misled by this kind of deepfake audio.¹⁸⁶

In **Spain**, security forces lack specific training and sufficient resources to deal with threats against journalists. On the contrary, police operations under the protection of the Citizen Security Law¹⁸⁷ often constitute an obstacle to

184 Reporters Without Borders, *Acquittal in the trial over the killing of Greek journalist Giorgos Karaivaz: RSF is saddened by a "week of impunity"*, 31 July 2024, <https://rsf.org/en/acquittal-trial-over-killing-greek-journalist-giorgos-karaivaz-rsf-saddened-week-impunity>

185 Natália Silenská: *Slovakia's Special Prosecutor's Office disbands amid controversial Criminal Code reform*, 20 March 2024, <https://www.euractiv.com/section/politics/news/slovakias-special-prosecutors-office-disbands-amid-controversial-criminal-code-reform/>

186 Reporters Without Borders, *As the investigation into a Slovak journalist Monika Tódová's "deepfake" is reopened, RSF is calling for this type of attack to be criminalised*, 6 March 2024, <https://rsf.org/en/investigation-slovak-journalist-monika-t%C3%B3dov%C3%A1-s-deepfake-reopened-rsf-calling-type-attack-be>

187 CPPA, *What You Should Know About the 'Gag Law' and Other Articles of the Penal Code If You Are a Journalist (Lo que debes saber de la 'Ley Mordaza' y otros artículos del Código Penal si eres periodista)*, *Periodistas de Andalucía*, 19 July 2021, <https://periodistasandalucia.es/lo-que-debes-saber-de-la-ley-mordaza-y-otros-articulos-del-codigo-penal-si-eres-periodista/>

journalism, limiting freedom of information and expression.^{188,189}

Violence from law enforcement officers

Violence from law enforcement officers continues to be a problem in a number of EU member states, especially in the context of demonstrations. Multiple media professionals have been injured in the last year while covering protests. Often, these attacks happen even after journalists have identified themselves as members of the press.

While covering pro-Palestinian protests in Paris, **France** in May 2024, a group of journalists were physically attacked by police. Nicola Mayart, editor-in-chief for Le Media TV, said a policeman was intimidating him and pressed his forehead against his. The policeman had

punched a protester in the face and realised that he was being filmed, then began to threaten Mayart. According to the journalist, several other media professionals were pushed, insulted and punched by police even though they had identified themselves as press.¹⁹⁰

In **Germany**, Mexican video journalist and contributor for *Berliner Zeitung*, Ignacio Rosaslanda, was injured by police when covering a pro-Palestine protest. Pro-Palestine students had occupied the Department of Social Sciences at Humboldt-University Berlin, and in the streets people were protesting against the police action. Rosasland was inside the building when the police started to clear it, trying to report on the situation.¹⁹¹ Police forces breached a barricaded door, and Rosalandas was hit in the back. According to him, a policeman repeatedly hit him in the face and immobilised him with handcuffs and a knee on the back. Rosalandas pressed charges

188 Reporteros Sin Fronteras, *Spain: RSF Welcomes Compliance with European Media Freedom Standards, Urges Prompt Reform of the 'Gag Law' and Will Closely Monitor the Implementation of Government Measures* (España: RSF celebra el cumplimiento de la normativa europea de libertad de medios, pide que la reforma de la Ley Mordaza se concrete cuanto antes, y vigilará de cerca cómo se materializan las medidas anunciadas por el Gobierno), 17 July 2024, <https://www.rsf-es.org/espana-rsf-celebra-el-cumplimiento-de-la-normativa-europea-de-libertad-de-medios-pide-que-la-reforma-de-la-ley-mordaza-se-concrete-cuanto-antes-y-vigilara-de-cerca-como-se-materializan-las-medidas>

189 Amnistía Internacional, *Gag Laws: Analysis of 9 Years of Restrictions and Freedom of Expression in Spain* (Leyes Mordaza: Análisis de 9 años de restricciones y libertad de expresión en España), 1 July 2024, <https://www.es.amnesty.org/en-que-estamos/blog/historia/articulo/ley-mordaza/>

190 Mapping Media Freedom: *Journalists physically assaulted by police officers while covering a pro-Palestinian demonstration*, 30 May 2024, <https://www.mapmf.org/alert/31597>

191 Tomasz Kurianowicz: *Polizeigewalt gegen Journalisten: Chefredaktion der Berliner Zeitung protestiert*, 24 May 2024, https://www.berliner-zeitung.de/mensch-metropole/polizeigewalt-gegen-journalisten-chefredaktion-der-berliner-zeitung-protestiert-li.2218207?utm_medium=Social&utm_source=Twitter#Echobox=1716562205

against the policeman. The police claim the journalist attacked first.¹⁹²

During the coverage of a seasonal firefighter protest in Athens, **Greece**, journalist Giorgos Androutsos of Rizospastis was violently detained by the police. Androutsos identified himself as a media professional but was still thrown down, beaten, and handcuffed by police officers. He was taken to Evangelismo Hospital for treatment and later released. He is facing charges.¹⁹³

While physical attacks on journalists by the police are not common in **Hungary**, two cases made headlines in 2024. More frequent are cases of intimidation, such as investigations by the Sovereignty Protection Office, which result in stigmatization.¹⁹⁴ Police also hinder

the work of media professionals in non-violent ways. For example, the police and the Counter-Terrorism Centre repeatedly asked Telex.hu, one of the few independent online portals, if the camera they were using had been stolen and tried to inspect it.¹⁹⁵

Also while covering protests, this time a pro-Palestinian demonstration on Dam Square in Amerstand, the **Netherlands** in November, a Dutch photographer was arrested by the police. The photographer was making film recordings for her work at the School of Journalism when she was arrested and detained for nine hours, even though she was able to present a press card. The Dutch Association of Journalists (NVJ) announced it would file a complaint with the police.¹⁹⁶

192 Niklas Liebetrau, *Polizeigewalt gegen Reporter der Berliner Zeitung: Mexikanische Botschaft und Medien reagieren*, 27 May 2024, <https://www.berliner-zeitung.de/mensch-metropole/polizeigewalt-gegen-reporter-der-berliner-zeitung-bei-hu-raeumung-mexikanische-botschaft-und-medien-reagieren-li.2219019>

193 South East Europe Media Organization, *Police Violence Against Journalist Sparks Outcry in Athens, Greece*, 8 November 2024, <https://seemo.org/ressources/08-11-2024-police-violence-against-journalist-sparks-outcry-in-athens-greece/>

194 Erdélyi Katalin, Katus Eszter: *The mayor read aloud from the report written by the Sovereignty Protection Office about Átlátszó (Felolvasott a Szuverenitásvédelmi Hivatal Átlátszóról írt jelentéséből a polgármester)*, Átlátszó, 6 December 2024, <https://atlatszo.hu/orszagszerte/2024/12/06/felolvasott-a-szuverenitasvedelmi-hivatal-atlatszorol-irt-jelentesebol-a-polgarmester/>

195 HVG.hu, *“We’re checking the camera’s serial number to see if it’s wanted” – Telex has filed a complaint after police obstructed them from questioning Szijjártó („Kamerának ellenőrizzzük a számát, nem-e körözik” – feljelentést tett a Telex, amiért rendőrök akadályozták, hogy Szijjártót kérdezzék)*, hvg.hu, 25 June 2024, https://hvg.hu/itthon/20240625_tel-ex-szijjarto-tek-rendorseg-feljelentes

196 Jesper Roele: *Journalist Arrested at Dam Demonstration, Police Claims She Was Protesting (Journalist zondag aangehouden bij demonstratie op de Dam, politie zegt dat ze aan het demonstreren was)*, Het Parool, 13 November 2024, <https://www.parool.nl/amsterdam/journalist-zondag-aangehouden-bij-demonstratie-op-de-dam-politie-zegt-dat-ze-aan-het-demonstreren-was~b41f1e3/>

Fermín Grodira, a contributor for *Público*, was injured in a national police charge in Valencia, **Spain**, during protests against Carlos Mazón, the president of the Valencian government. Grodira was following the charge at a distance, but one of the police officers hit him with his baton on his thigh. The incident happened despite Grodira wearing an orange armband with the word PRESS, a helmet with a camera and while he was recording with his phone.¹⁹⁷

State surveillance and abusive lawsuits

While there have not been any big spyware scandals, like the large-scale use of Pegasus spyware against journalists in many European countries in recent years, its use against journalists continues to be a problem. This is especially true for exiled journalists from Russia or Belarus, who continue to report on developments in the countries they had to flee from.

In the 2023 case of a wiretapped telephone of the Last Generation in **Germany**, which was mainly used to talk to the press, two journalists, together with the NGOs Reporters Without

Borders and Gesellschaft für Freiheitsrechte, lodged a constitutional complaint. Last Generation was under observation by the Munich Public Prosecutor's Office, which accused it of forming a criminal association. Part of the constitutional complaint is that the Munich District Court, which issued the surveillance warrant, did not mention freedom of the press at all. This is especially worrisome as it was very likely that journalists would be directly affected by the wiretapping.¹⁹⁸

In May 2024, Access Now revealed¹⁹⁹ seven new cases of Russian and Belarusian journalists and activists in European exile who had been targeted by Pegasus spyware. One of the journalists affected was based in Vilnius, **Lithuania**. Access Now's Digital Security Helpline, with technical confirmation from Citizen Lab, identified an attempt to infect the journalist's device on or around the day prior to his attendance of an event in Riga, Latvia for Russian journalists in exile.²⁰⁰

Nataliina Radzina, a Belarusian journalist and editor-in-chief of independent Belarusian news site Charter97.org, who is based in Warsaw, **Poland** was targeted in the attack. She was

197 *Público*: *El colaborador de "Público" Fermín Grodira, herido en una charla de la Policía en las protestas contra Mazón en València*, 9 November 2024, <https://www.publico.es/sociedad/colaborador-publico-fermin-grodira-herido-carga-policia-protestas-mazon-valencia.html>

198 Reporter ohne Grenzen, *Pressetelefon: RSF erhebt Verfassungsbeschwerde*, 11 September 2024, <https://www.reporter-ohne-grenzen.de/pressemitteilungen/meldung/pressetelefon-rsf-erhebt-verfassungsbeschwerde>

199 Access Now, *Exiled, then spied on: Civil Society in Latvia, Lithuania, and Poland targeted with Pegasus Spyware*, 30 May 2024, <https://www.accessnow.org/publication/civil-society-in-exile-pegasus/>

200 Mapping Media Freedom: Freelance journalist in exile in Lithuania targeted by Pegasus spyware, 30 May 2024, <https://www.mapmf.org/alert/31676>

approached by Access Now in late 2023, after she received security warnings from Apple that “state-sponsored attackers” may have targeted her phone.²⁰¹

Strategic lawsuits against public participation (SLAPPs) continue to be a problem across EU Member States. Their goal is to silence, among others, critical journalists. Often, they involve long court procedures, high costs or demands for damages in hopes that the ‘smaller’ opponent (the media outlet or journalist) is unable to afford such lawsuits. **Belgian** law does not provide for a mechanism to dismiss unmeritorious or SLAPP cases in early procedural stages. In 2024, the former mayor of Andenne brought a case against a journalist following a portrait published in a magazine and against an online media site for a video published a few weeks earlier.²⁰² Mélanie De Grootte, a journalist of the Wilfried magazine, reported

testimonies by women representatives and workers denouncing moral and sexual harassment by the mayor. In mid-January 2025, the Walloon Minister for Local Authority annulled the decision of the Andenne city to take legal action against De Grootte.²⁰³

In **Bulgaria**, both the Association of European Journalists - Bulgaria²⁰⁴ and Reporters without Borders²⁰⁵ note that SLAPPs are increasingly used to silence critical journalism. There are only limited procedural safeguards for victims of SLAPPs and little transparency in law enforcement actions. The country lacks legislative measures to protect media professionals from judicial harassment.²⁰⁶

In 2024, former Bulgarian Prime Minister and now member of the parliament Kalin Stoyanov brought a lawsuit against independent online media outlet BIRD, for its publications on

201 Mapping Media Freedom: *Belarusian journalist Nataliia Radzina in exile in Poland targeted with Pegasus spyware*, 30 May 2024, <https://www.mapmf.org/alert/31667>

202 Belga, “*Une journaliste de Wilfried au tribunal après avoir brossé le portrait de Claude Eerdeken*”, La Libre, 21 October 2024, <https://www.lalibre.be/belgique/elections-belges/elections-communales/2024/10/21/une-journaliste-de-wilfried-au-tribunal-apres-avoir-brosse-le-portrait-de-claude-eerdeken-4ETXMG5BHRDNHLVZ-MGWK4ZYBB4/>

203 Mapping Media Freedom, *Wilfried journalist sued by former mayor Claude Eerdeken over investigative portrait*, 11 October 2024, <https://www.mapmf.org/alert/32240>

204 AEJ – Bulgaria, *Журналистика под стрес. 2024 г. – годишно изследване на свободата на словото в България*, 2024, <https://aej-bulgaria.org/wp-content/uploads/2024/11/Jurnalistika-pod-stres-2024.pdf>

205 Reporters Without Borders, *Press Freedom Index: Bulgaria*, 2024, <https://rsf.org/en/country/bulgaria>

206 *Държавата не бива да сключва рекламни договори с медии, които не са осветили собственика си*, Capital.bg, 9 March 2024, https://www.capital.bg/politika_i_ikonomika/pravo/2024/05/09/4621345_durjavata_ne_biva_da_skljuchva_reklamni_dogovori_s/

Stoyanov's connections to a suspected criminal.²⁰⁷ Stoyanov is demanding BGN 65,000 (€33,000) in damages from BIRD's reporting about the possible connection between him and Martin Bozhanov, the suspected criminal. The former Prime Minister claims the information in the reporting goes beyond the limits of freedom of speech and affects his authority. Bozhanov was investigated in the summer of 2021 by the Anti-Corruption Fund in relation to a corruption scheme.²⁰⁸

In **Croatia**, registering cases as SLAPPs is challenging, as they are still not defined under law. Ahead of the parliamentary elections, the Croatian Journalists Association requested that the new government should introduce a mechanism to reject SLAPPs early on. They also called for a clear definition of SLAPPs.²⁰⁹ An annual survey by the CJA and the Center

for Democracy and Law Miko Tripalo showed that in May 2024, at least 752 lawsuits against journalists and media outlets were pending.²¹⁰

The **French** association La Maison des Lanceurs d'Alerte (House of Whistle-Blowers) has noted a worrying number of lawsuits in France, by companies and by public figures, against whistle-blowers, journalists and NGOs.²¹¹ **Germany** currently has no significant protection of journalists against SLAPPs. As a result, over the last year, far-right actors in particular have sought to suppress critical reporting. When the investigative platform Correctiv published an article about a meeting of far-right extremists in Potsdam,²¹² some of the people present at the meeting targeted the media coverage of the event. Ulrich Vosgerau, participant and lawyer, initiated over 40

207 *Калин Стоянов съди журналисти за 65 хиляди лева. Защо?*, Deutsche Welle Bulgaria, 17 April 2024, <https://www.dw.com/bg/kalin-stoanov-sdi-zurnalisti-za-65-hiladi-leva-zaso/a-68843758>

208 Mapping Media Freedom: *Interior Minister Kalin Stoyanov files criminal defamation lawsuit against BIRD.bg journalists*, 15 April 2024, <https://www.mapmf.org/alert/31448>

209 Croatian Journalists' Association, *CJA's five requests to the new government (HND-ovih pet zahtjeva novoj vlasti)*, 9 April 2024, <https://www.hnd.hr/hnd-ovih-pet-zahtjeva-novoj-vlasti>.

210 Croatian Journalists' Association, *CJA: At least 752 lawsuits worth €4.1 million are active, and in 1333 adjudicated cases - 40% were pure SLAPP (HND: Aktivne najmanje 752 tužbe teške 4,1 milijun eura, a u 1333 presuđena predmeta - 40 posto je bio čisti SLAPP)*, 24 May 2024, <https://www.hnd.hr/hnd-aktivne-najmanje-752-tuzbe-teske-4-1-milijun-eura-a-u-1333-presudena-predmeta-40-posto-je-bio-cisti-slapp>

211 La Maison des Lanceurs d'Alerte, *Total censorship: we will not be silenced by SLAPPs!*, 26 June 2023, <https://mlalerte.org/total-censorship-we-will-not-be-silenced-by-slapps/>

212 Marcus Bensmann et al., *Neue Rechte - Geheimplan gegen Deutschland*, correctiv, 10 January 2024, <https://correctiv.org/aktuelles/neue-rechte/2024/01/10/geheimplan-remigration-vertreibung-afd-rechtsextreme-november-treffen/>

proceedings,²¹³ while also launching a fund-raising campaign to cover his legal costs.²¹⁴

Some good news came from **Greece**, even though journalists have increasingly faced SLAPPs. In the proceedings initiated by Grigoris Dimitriadis, the nephew of the Prime Minister, against the platform Reporters United, the newspaper *Efimerida ton Syntakton* and journalist Thanasis Koukakis, the Athens court dismissed the case. The court ruled that the reporting about Dimitriadis's involvement in the Predator spyware scandal was in the public interest and protected under freedom of expression.²¹⁵ In **Hungary**, the GDPR is increasingly used to file SLAPPs against journalists. The goal is to prevent media companies from reporting on their enrichment

from businesses, which are often backed by public funds.²¹⁶

In **Italy**, public officials were responsible for 17 of 44 legal cases against journalists reported by the Mapping Media Freedom platform.²¹⁷ In the annual report for 2024 from the Coalition Against SLAPPs in Europe (CASE), Italy is mentioned with the highest number of SLAPPs (26) among the investigated countries.²¹⁸ Court proceedings are often used by government and public officials to intimidate critical journalists.²¹⁹ Often, the officials ask for large sums of money in 'damages'. In June 2024, the Italian Minister of Enterprises and Made in Italy Adolfo Urso filed a lawsuit against the papers *Il Foglio* and *Il Riformista*, asking for compensation ranging from

213 Junge Freiheit, *Spendenaufwurf - "Correctiv"-Rebell Vosgrau bittet um Unterstützung*, 17 October 2024, <https://junge-freiheit.de/kultur/medien/2024/correctiv-rebell-vosgrau-bittet-um-unterstuetzung/>

214 See <https://www.gofundme.com/f/Prozesskostenhilfe-nach-dem-Potsdam-Treffen>

215 Eleni Stamatoukou, *Greek Court Dismisses Lawsuit Against Journalists Reporting Surveillance Scandal*, Balkan Insight, 11 October 2024, <https://balkaninsight.com/2024/10/11/greek-court-rejects-slapp-against-journalists-reporting-on-surveillance-scandal/>

216 Hungarian Civil Liberties Union, *'SLAPPed by GDPR' - How the General Data Protection Regulation can restrict press freedom (Adatvédelmi alapú sajtó elleni perek Magyarországon)*, 11 March 2024, <https://tasz.hu/cikkek/adatvedelmi-alapu-sajto-elleni-perek-magyarorszagon-elkeszult-a-tasz-jelentese/>, Zsiborás Gergő: *Hell Seeks Recall of Newly Released Forbes Magazine Issue (A Hell újra visszahívna az éppen megjelent Forbes magazint)*, Forbes, 5 September 2024, <https://forbes.hu/uzlet/a-hell-ujra-visszahivna-az-eppen-megjelent-forbes-magazint/>

217 European Centre for Press and Media Freedom, *Mapping Media Freedom*, 2024, https://www.mapmf.org/explorer?f.from=2024-01-01&f.to=2024-12-04&f.country=Italy&f.type_of_incident=Legal+incident

218 Coalition against SLAPPs in Europe, *A 2024 Report on SLAPPs in Europe: Mapping Trends and Cases*, CASE, 9 December 2024, <https://www.the-case.eu/resources/a-2024-report-on-slapps-in-europe-mapping-trends-and-cases/>

219 OBC Transeuropa, *Press freedom in Italy: those in power are not to be criticised*, 3 May 2024, <https://www.balcanicaucas.org/eng/Areas/Italy/Press-freedom-in-Italy-those-in-power-are-not-to-be-criticised-231217>

€250,000 to €500,000.²²⁰ In March 2024, Daniela Santanchè, Minister of Tourism and member of the Fratelli d'Italia party, sued the magazine *L'Espresso* over an article examining Santanchè's business history. The minister requested €5 million in damages.²²¹

SLAPPs also continue to remain a significant challenge in **Lithuania**, particularly for journalists investigating corruption or exposing sensitive topics. These lawsuits are often used by powerful individuals or entities to intimidate and silence journalists through prolonged and costly legal battles, deterring them from pursuing investigative reporting.

A report published in April 2024 by Free Press Unlimited highlights the effects abusive lawsuits have on journalism in the **Netherlands**.²²² Besides the psychological and financial pressure they put on all, but especially on small media outlets and freelance journalists, they also lead to self-censorship. Journalists stated that they often feel like they are on

their own and experience little solidarity from colleagues.²²³

In a particularly discouraging development, Prime Minister Robert Fico of **Slovakia** initiated a SLAPP case against the editor-in-chief of news outlet Aktuality.sk, as well Ringier Slovak Media, the publisher of the book *Fico-Obsessed with Power*. The Prime Minister's suit alleges that he is dissatisfied with the picture they chose for the cover of the book and seeks €100,000 in damages from each defendant. As the European Centre for Press and Media Freedom noted, the case "has all the hallmarks of a SLAPP" and should be promptly dismissed by the courts.²²⁴

Journalists working for the **Slovenian** investigative portal Necenzurirano were once again hit with a lawsuit by Rok Snežič, a tax expert close to former prime minister Janez Janša. He has been using SLAPPs against the portal for the last four years. In November 2024, after Snežič had filed his 52nd lawsuit, the editorial

220 European Centre for Press and Media Freedom, *Minister Adolfo Urso sues Il Foglio and Il Riformista journalists for defamation*, 7 June 2024, Mapping Media Freedom, 30 September 2024, <https://www.mapmf.org/alert/31863>

221 European Centre for Press and Media Freedom, *Minister Santanchè sues L'Espresso for defamation*, Mapping Media Freedom, 26 March 2024, <https://www.mapmf.org/alert/31870>

222 Free Press Unlimited: *An Underestimated Problem: Legal Pressure on Dutch Journalism (Een onderschat probleem: disproportionele juridische druk op de Nederlandse journalistiek)*, 10 April 2024, <https://www.freepressunlimited.org/sites/default/files/documents/Een%20onderschat%20probleem%2C%20disproportionele%20juridische%20druk%20op%20de%20Nederlandse%20journalistiek.pdf>

223 Uredništvo, *Še 52. tožba Roka Snežiča: od nas zahteva 10 tisoč evrov zaradi duševnih bolečin*, necenzurirano.si, 20 November 2024, <https://necenzurirano.si/clanek/novice/rok-snezic-slapp-andreja-katic-tozbe-1383623>.

224 European Centre for Press and Media Freedom, *Slovakia's Prime Minister launches SLAPP case against leading investigative journalist*, October 2024, <https://www.ecpmf.eu/slovakias-prime-minister-launches-slapp-case-against-leading-investigative-journalist/>

board wrote: “The theatre of the absurd goes on. Rok Snežič continues to file a series of lawsuits, not seeking justice, but wanting to financially drain our media. All the lawsuits he has filed are more or less the same. They are three or four pages long, usually revolving around one sentence from our articles, even though Snežič loses every case. But he does it because he can. He makes a mockery of everyone, both the courts and the state, for which he is officially a social case.”

New measures to improve the protection of journalists

On the EU level, two major pieces of new legislation offer the opportunity to improve the protection of journalists against attacks and harassment. In May 2024, new rules against SLAPPs started to apply. Just a day later, the European Media Freedom Act (EMFA) entered into force.²²⁵

The EMFA is supposed to, among other things, protect editorial independence and journalistic sources. The latter should also include protection against the use of spyware. However, civil society organisations have criticised the provisions in the text as failing to offer effective protection and safeguards against surveillance.²²⁶

In December 2024, the Latvian Association of Journalists announced the creation of a platform for anyone, including journalists themselves, to report hate speech, violence, harassment, and intimidation against journalists and other media workers, either on social media or in real life.²²⁷ The platform features a special “Alert Button”²²⁸ to submit reports of violence, hate speech or harassment. Reporting can also be done anonymously. The platform, for the first time, offers the opportunity to gather evidence for the public, policy makers, law enforcement, international organisations and other relevant positions about attacks against media professionals. Going forward, this offers the opportunity to improve the protection of journalists.

225 European Commission, *Protecting journalists and promoting media freedom: New rules enter into force*, 07 May 2024, https://commission.europa.eu/news/protecting-journalists-and-promoting-media-freedom-new-rules-enter-force-2024-05-07_en

226 Center for Democracy and Technology, *Civil Society Joint Statement in the Use of Surveillance Spyware in the EU and Beyond*, 3 September 2024 <https://cdt.org/insights/civil-society-joint-statement-on-the-use-of-surveillance-spyware-in-the-eu-and-beyond/>

227 Latvian Journalists Association, *Aicina ziņot par naida runu un vajāšanu pret žurnālistiem un mediju darbiniekiem*, 4 December 2024, <https://www.lsm.lv/raksts/zinas/latvija/04.12.2024-aicina-zinot-par-naida-runu-un-vajasanu-pret-zurnalistiem-un-mediju-darbiniekiem.a578975/>

228 Latvian Journalists Association, *Latvijas Žurnālistu asociāciju turpmāk vadīs Tetarenko-Supe*, 29 March 2025, <https://latvijaszurnalisti.lv/latvijas-zurnalistu-asociaciju-turpmak-vadis-tetarenko-supe/>

Gender-based violence

While the possibility of harassment and attacks is a reality for all journalists, women journalists are especially affected. Often harassment against them includes a sexualised component.

In September 2024, **Bulgarian** NOVA TV investigative journalist Marieta Nikolaeva was notified that a manipulated image of her was circulating on tabloid and disinformation websites. The picture was copied from Nikolaeva's Facebook account and her face was then edited to appear on a nude body. NOVA TV, Nikolaeva and her employer have taken legal action.²²⁹

In **Italy**, women journalists are much more likely to become targets of sexist and ageist smear campaigns. In **Slovakia**, a far-right conspiracist named Daniel Bombic targeted women journalists in June 2024 on social media. In a Telegram channel with 25,000 followers, Bombic started a poll asking, "Who do you think is the physically ugliest, most promiscuous, most frigid, and most disgusting woman in the media in Slovakia? Thank you, respectfully".²³⁰

In **Sweden** the risk of attacks is, in general, relatively low. However, online harassment and online threats are especially brutal on women journalists, according to a study from Lunds University. A study of the Swedish Defense Research Agency on hate and harassment on the online forum Flashback, focusing on journalists, politicians and influencers, found that 55% of women faced hate, compared to 41% of men.²³¹ Women journalists were the most targeted. Women were also more likely to experience sexual harassment.

229 Mapping Media Freedom, *Manipulated image of investigative journalist Marieta Nikolaeva circulate online*, 20 September 2024, <https://www.mapmf.org/alert/32155>

230 Mapping Media Freedom, *Far-right conspiracist Daniel Bombic targets women journalists on social media*, 30 June 2024 <https://www.mapmf.org/alert/32758>

231 SVT Nyheter, *FOI:s rapport visar: Två av tre kvinnliga journalister hatas på nätet*, 16 December 2020, <https://www.svt.se/nyheter/inrikes/foi-s-rapport-visar-tva-av-tre-kvinnliga-journalister-hatas-pa-natet>.

Freedom of expression and censorship

Key findings

- Access to information for journalists is inconsistent across the Union, with both national regulations and officials' obstinance significantly hampering efforts to access public information.
- Hate speech against journalists and other media workers did not abate in 2024, nor did the trend of politicians being the source of this hate. National-level efforts to combat it continue to be insufficient.
- The dissemination of disinformation continued almost unfettered in 2024, with governments doing far too little to combat it, especially online and in the context of key events, like national elections.

Hate speech

Hate speech continues to be a problem in **Croatia**, in part because the Council for Electronic Media, the national media regulator, continues to interpret its powers narrowly and does not consider cases of hate speech in the media to fall within its jurisdiction.²³² This clear refusal to regulate the issue means that many cases of hate speech go uninvestigated, if not unreported to begin with.

In **Germany**, attacks against journalists most often occur online, especially when it comes to instances of hate speech.²³³ It is a salient issue in the country, but despite the clear need to urgently address it, key points presented by the Federal Ministry of Justice in 2023 for a law against digital violence still have not led to a draft approved by the cabinet, despite hope for progress in 2024.²³⁴

Social media is a major source of hate speech in **Slovakia**, in part because the Council for Media Services, as the media regulator, currently has no statutory power to supervise

232 Paško Bilić; Antonija Petričušić, *Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European member states and in candidate countries in 2023. Country report : Croatia*, Centre for Media Pluralism and Media Freedom, 2024, <https://cadmus.eui.eu/handle/1814/76996>

233 See for example the attack on a Deutsche Welle Reporter in October 2024, <https://www1.wdr.de/kultur/kulturnachrichten/pressefreiheit-deutsche-welle-al-shami-100.html>

234 Reporters Without Borders, *Nahaufnahme Deutschland*, 2024, https://www.reporter-ohne-grenzen.de/fileadmin/Redaktion/Downloads/RSF_Nahaufnahme_Deutschland_2024.pdf

breaches of the Digital Service Act by online platform providers. Exacerbating the problem is the fact that politicians continue to be one of the main perpetrators of hate speech. The Prime Minister regularly calls journalists liars or other derogatory names at press conferences, and these sentiments are intensified by other politicians and government-aligned sources online.²³⁵

Slovenia's draft Mass Media Act²³⁶ stipulates that media outlets whose responsible editors or similarly positioned employees have been convicted in the last two years of the criminal offense of public incitement to hatred, violence, and intolerance under Article 297 of the Penal Code are also excluded from certain state-aid programs, and this measure complements the existing policy of demonetising hate speech in the media.²³⁷

Fighting disinformation

Mechanisms to combat disinformation are ineffective in **Bulgaria**, and fact-checking and content verification tools are limited. Anonymous channels and unregulated content aggregators amplify the spread of misinformation and disinformation. The implementation of the Digital Services Act remains in its early stages, with no significant impact on the national regulatory framework so far.

According to other experts from the platform *Nezávislá média*, the biggest challenges to existing **Czech** media law include increasingly prolific disinformation, almost always disseminated by sources that practice no journalistic standards or ethics.²³⁸ The government-controlled Central European Press and Media Foundation, or KESMA, is a significant source of disinformation in **Hungary**. KESMA's vast network of media outlets functions as a tool for delivering government-sponsored disinformation and propaganda, and there were no measures to curb this in 2024.

235 For example, at the press conference of the ruling coalition parties held on 3 December 2024, the prime minister Fico accused the mainstream journalists of lying and called on the public to stop believing the media. See e.g. Peter Dlhopolec, *Primitive premier blows up at media*, *The Slovak Spectator*, 3 December 2024, <https://spectator.sme.sk/politics-and-society/c/robert-fico-meltdown-media-slovakia> Another example, in October 2024, Fico called reporters “bloodthirsty bastards” and said they are “possessed by the devil”. The Committee to Protect Journalists, *Slovak PM Fico attacks journalists as “possessed by the devil”*, 11 October 2024, <https://cpj.org/2024/10/slovak-pm-fico-attacks-journalists-as-possessed-by-the-devil/>

236 For more information see the draft Mass Media Act, <https://imss.dz-rs.si/IMiS/ImisAdmin.nsf/ImisnetAgent?OpenAgent&2&DZ-MSS-01/d6fd1153855435e83b8d6104ed013942ae66d2dd26a9901a2db0b-4308cb6123a>

237 National Assembly of Slovenia, Penal code (Kazenski zakonik), 20 May 2008, and subsequent modifications

238 *Nezávislá média*, available in Czech, <https://nezavisla.media/>

In **Romania**, disinformation continues to be a problem, although the national Audiovisual Authority continues to apply sanctions to offending media outlets. In one such case in 2024, it levied two fines against the same TV program, totalling 150,000 RON (approx. €30,000), for spreading disinformation and making derogatory remarks.²³⁹ It came against the backdrop of increased disinformation campaigns, especially through social media, around the presidential campaign.

Efforts to combat disinformation in **Slovakia** remained insufficient by the close of 2024, with longstanding calls to introduce legislation to combat disinformation ignored. In fact, representatives of the current government regularly use social media to propagate disinformation, and the spread of disinformation by alternative media, for free and without paywalls, remains a critical concern.

In **Spain**, although the Digital Services Act introduced transparency obligations for digital platforms,²⁴⁰ these regulations focus on intermediaries, leaving out some of the large producers of disinformation. Experts in the country continue to call for extending

accountability to those who finance or profit from disinformation, including political parties, institutions and corporations.²⁴¹

Freedom of information

Access to information in **Bulgaria** remains restricted under the Freedom of Information Act, with overly broad grounds to refuse requests and the absence of an effective implementing framework, even in cases where access to information has been mandated by a court. Official registers and property declarations are not easily accessible, limiting journalists' ability to conduct effective investigations.

Despite a recommendation from the EU Commission in its 2024 Rule of Law Report, **Germany** has still not progressed on a plan to create a legal basis for the right to information of the press with regard to federal authorities. Some areas are still completely excluded from the right to information by the press; for example, courts deny journalists the right to receive any information about pardon decisions made by the President.²⁴²

239 G4Media, *CNA: Realitatea TV - fines of 150,000 lei. Disinformation and homophobic statements in the program 'Behind the Scenes of the Parallel State'*, 1 December 2024, <https://www.g4media.ro/cna-realitatea-tv-amenzi-de-150-000-de-lei-dezinformare-si-afirmatii-homofobe-in-emisiunea-culisele-statului-paralel.html>

240 European Commission, *EU Digital Services Regulation*, 27 October 2022, https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act_es

241 Xnet, *Digital Services Package (DSA), Xnet's Analysis (Paquete de Servicios Digitales (DSA), el análisis de Xnet)*, Xnet - Internet, Rights and Democracy in the Digital Era, 25 August 2023, <https://xnet-x.net/es/posicion-xnet-dsa-package/>

242 Vivian Kube, Hannah Vos, *Begnadigung von Gefolgsleuten – und keiner merks*, Verfassungsblog, 15 April 2024, <https://verfassungsblog.de/begnadigung-von-gefolgsleuten-und-keiner-merks/>

At the level of the *Länder*, journalists still do not have the right to access documents, and instead only have the right to have their questions answered. To gain access to public documents, they need to base their claims on the individual freedom of information acts of the *Länder*, which vary greatly in their scope, and which still do not exist in two states: Bavaria and Lower-Saxony).²⁴³ Furthermore, exceptions in access to information legislation are interpreted broadly both by the authorities and the courts, severely diminishing the effect of this legislation. That is, for example, the case with regard to confidentiality. Authorities can easily declare documents as “for official use only”, which makes such documents fall under the exception clause. Judicial review regarding the need for such confidentiality is limited.²⁴⁴

A report published in November 2024 took an in-depth look at the state of access to information and public documents in **Greece**, with a focus on the implementation of freedom of information regulations and the challenges that journalists and citizens face in exercising

their right to access public data. The report found that despite the existence of the Freedom of Information Law, significant obstacles in obtaining public documents and information remain, and that requests for information are often met with delays or outright refusals, often accompanied by vague justifications. This continues to make it difficult for the public and the media to hold the government accountable.²⁴⁵

Because **Hungary** did not pass an exemption for journalists when implementing the GDPR, balancing the right to privacy against the freedom of the press is left to the discretion of the authorities. Surprisingly, there have been potentially positive developments in this area recently. Some progressive rulings upholding press freedoms were issued by both the National Authority for Data Protection and Freedom of Information (NAIH) and the Supreme Court, offering some hope for a more balanced approach.²⁴⁶ 2024 was the first full year in force of an amendment to the Penal Code that specifies that journalists’ reporting

243 Ingo Dachwitz, *Neues Transparenzgesetz für Sachsen*, netzpolitik.org, 31 December 2022, <https://netzpolitik.org/2022/neues-transparenzgesetz-fuer-sachsen-wir-hinken-teilweise-weit-hinterher/>

244 Vivian Kube et al., *Missbrauch von „Verschlusssachen“ zur Informationsblockade*, lto, 22 July 2023, <https://www.lto.de/recht/meinung/m/frag-den-staat-verschlussache-nur-fuer-den-dienstgebrauch>

245 VouliWatch, *Policy Paper – Recommendations for the reform of the legal framework of the right of access to public information*, November 2024, <https://vouliwatch.gr/resources/file/2024/10/8/aac847e9-1e89-4a1b-95a6-1e89ea87940d.pdf>

246 Hungarian Civil Liberties Union, *Success in the Bige László Case: Curia Rules Billionaire Cannot Remain Anonymous (TASZ siker: a Bige László ügyben a Kúria is megerősítette, hogy nem rejtozkodhet a milliárdos)*, 6 November 2024, <https://tasz.hu/cikkek/tasz-siker-bige-laszlo-ugyeben-a-kuria-is-megerositette-hogy-nem-rejtozkodhet-a-milliardos/>, HVG, *Curia’s Decision: Bige László Cannot Remain Anonymous (Döntött a Kúria: nem rejtozkodhet Bige László)*, hvg.hu, 6 November 2024, https://hvg.hu/kkv/20241106_Dontott-a-Kuria-nem-rejtozkodhet-Bige-Laszlo

on public affairs cannot lead to criminal liability for defamation or libel, if it is information reported in the media and not intended to “manifestly and seriously harm the dignity of the victim.”²⁴⁷

A review of **Ireland’s** Freedom of Information Act of 2014, commenced by the Department of Public Expenditure and Reform in 2021, remained ongoing as of December 2024. It was noted in the state’s contribution to the European Commission’s rule of law reporting process that the final review report would be presented to the government in 2024,²⁴⁸ but it was unclear whether this had happened by the close of the year.²⁴⁹

The Commission on the Future of Policing in Ireland recommended that there be a review of An Garda Síochána’s current status under the Freedom of Information Act,²⁵⁰ as the law currently only provides access to police records relating to human resources, finances, and procurement.²⁵¹ Freedom of information requests submitted to the Department of Justice and the Department of An Taoiseach by Liberties’ Irish member organisation, the Irish Council for Civil Liberties, have revealed no record of such a review taking place.²⁵²

In 2024, an independent media investigation revealed that **Malta’s** public broadcaster has been abusing millions of public funds, irregularly using state subsidies and misallocating some €1.1 million.²⁵³ This investigation was

247 Hungarian Civil Liberties Union (TASZ), *TASZ welcomes the decriminalization of the free discussion of public affairs and calls attention to the government’s further actions needed (A TASZ üdvözli a közügyek szabad megvitatásának dekriminalizációját és felhívja a figyelmet a kormány további teendőire)*, 26 April 2023, <https://tasz.hu/cikkek/a-tasz-udvozli-a-kozugyek-szabad-megvitatasanak-kozelgo-dekriminalizaciojat-es-felhivja-a-figyelmet-a-kormany-tovabbi-teendoire/>

248 Ireland, Member State Contribution European Commission Annual Rule of Law Report 2024, 2024, https://commission.europa.eu/document/download/0123a8f4-05e6-4021-8240-ac39a5d1fb65_en?filename=76_1_58157_input_mem_ireland_en.pdf

249 Dáil Éireann Debate Monday 9 September 2024: Freedom of Information-Parliamentary question Ged Nash TD, 2024, https://www.oireachtas.ie/en/debates/question/2024-09-09/446/#spk_372

250 The Commission on the Future of Policing in Ireland, *Final Report*, 18 September 2018 <https://policereform.ie/en/polref/pages/pb18000006>

251 Houses of the Oireachtas, No. 30 of 2014, Freedom of Information Act (2014), <https://www.irishstatutebook.ie/eli/2014/act/30/enacted/en/html>

252 Emily Williams, *Human Rights in Irish Policing: Analysing the Implementation of the Recommendations from the Commission on the Future of Policing in Ireland*, ICCL, May 2024 <https://www.iccl.ie/wp-content/uploads/2024/05/CoFPI-report-WEB.pdf>

253 The Shift Team, *PBS using millions of public funds irregularly, two-year FOI battle reveals*, The Shift, 28 April 2024, <https://theshiftnews.com/2024/04/28/pbs-using-millions-of-public-funds-irregularly-two-year-foi-battle-reveals/>

supported by information from freedom of information requests that had, until very recently, been repeatedly refused, and there was no effort in 2024 to improve the country's Freedom of Information Act, which has long been considered deficient. Government entities regularly limit journalists' access to information, often claiming that no such information exists – a claim that in many cases was found to be untrue by the Data Protection Commissioner. More than 40 legal challenges were initiated by government entities against FOI requests by one media outlet, The Shift;²⁵⁴ by the close of 2024, the outlet had won all 40 cases at the Information and Data Protection Commissioner Appeals Tribunal. Nevertheless, government agencies have yet to provide the information.²⁵⁵

Freedom of information is mentioned in the **Dutch** Constitution but is not guaranteed. The Open Government Act, which came into effect in 2022, provides the legal basis for the release of government information. Concerns raised in a 2023 study to evaluate the functioning of The Open Government Act have not yet been adequately addressed. The results highlight some important concerns of journalists. They have indicated that active disclosure has not yet improved and that government cooperation is not satisfactory when it comes to freedom of information requests filed under the Open Government Act. Furthermore, journalists expect intentional, politically motivated delays that prevent meeting the legal deadline to process an Open Government Act request.²⁵⁶

In **Spain**, Ley Mordaza,²⁵⁷ the so-called Gag Law, continues to represent a significant

254 David Lindsay, *Government launches new attempt to cripple The Shift with FOI appeals*, The Shift, 3 August 2022, <https://theshiftnews.com/2022/08/03/government-launches-new-attempt-to-cripple-the-shift-with-foi-appeals/>

255 Elizabeth De Gaetano, *Government still refusing to detail payments to Saviour Balzan despite The Shift winning all cases*, The Shift, 21 January 2024, <https://theshiftnews.com/2024/01/21/goverment-still-refusing-to-detail-payments-to-saviour-balzan-despite-the-shift-winning-all-cases/>

256 Instituut Maatschappelijke Innovatie, Open State Foundation and the University of Amsterdam: *Leaves on the Track – Analysis of the Handling of Woo Requests 2023 (Blaadjes op het Spoor – Analyse afhandeling Woo-verzoeken 2023)*, February 2023, <https://www.imi.nu/userfiles/imi.nu/files/Blaadjes-op-het-spoor-rapport.pdf>

257 Ibid 192

restriction on freedom of expression and freedom of information, significantly complicating the work of journalists.^{258,259} Furthermore, access to public information in Spain continues to be limited by the limitation of the transparency law and by the inadequate transposition of the General Data Protection Regulation (GDPR), as well as by obsolete regulations such as the Official Secrets Law of 1968. Reforming these laws is essential.^{260,261}

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- 258 Reporteros Sin Fronteras, *Spain: RSF Welcomes Compliance with European Media Freedom Standards, Urges Prompt Reform of the ‘Gag Law’ and Will Closely Monitor the Implementation of Government Measures (España: RSF celebra el cumplimiento de la normativa europea de libertad de medios, pide que la reforma de la Ley Mordaza se concrete cuanto antes, y vigilará de cerca cómo se materializan las medidas anunciadas por el Gobierno)*, 17 July 2024, <https://www.rsf-es.org/espana-rsf-celebra-el-cumplimiento-de-la-normativa-europea-de-libertad-de-medios-pide-que-la-reforma-de-la-ley-mordaza-se-concrete-cuanto-antes-y-vigilara-de-cerca-como-se-materializan-las-medidas/>
- 259 Amnistía Internacional, *Gag Laws: Analysis of 9 Years of Restrictions and Freedom of Expression in Spain (Leyes Mordaza: Análisis de 9 años de restricciones y libertad de expresión en España)*, accessed 29 November 2024, <https://www.es.amnesty.org/en-que-estamos/blog/historia/articulo/ley-mordaza/>
- 260 Cortes Generales, *Ley 9/1968, de 5 de abril, sobre secretos oficiales*, *Boletín Oficial del Estado*, núm. 84, 6 April 1968, pp. 5143-5144, <https://www.boe.es/buscar/act.php?id=BOE-A-1968-444>
- 261 Marisol Hernández, *Brussels Urges the Government to Reform the Official Secrets Law to Meet European Standards (Bruselas apremia al Gobierno a reformar la ley de secretos oficiales para cumplir el estándar europeo)*, *elconfidencial.com*, 16 August 2024, https://www.elconfidencial.com/espana/2024-08-16/bruselas-apremia-gobierno-reformar-ley-secretos_3939362/

European legislation related to media freedom and pluralism

Several key pieces of legislation relating to media freedom and pluralism entered into force, fully or partially, in 2024. The European Media Freedom Act (EMFA), the Digital Services Act (DSA), the Digital Markets Act (DMA), the Anti-SLAPP Directive, Regulation on the Targeting and Transparency of Political Advertising (TTPA) and the Artificial Intelligence Act (AIA) created a new legal environment with the potential of strengthening media freedom and pluralism if enforced properly.

Moreover, negotiations around the next Multiannual Financial Framework (MFF) got underway, providing an opportunity for the EU to provide sufficient financial resources to media freedom-related projects, initiatives and groups, as well as to the secretariats of relevant boards that are now tasked with upholding EU media law, namely the Secretariat of the European Board for Media Services (EBMS), the European Board for Digital Service (EBDS) and for the AI Office. These authorities play an important role in EU-level enforcement and further elaboration of delegated acts, as well as in supporting the national regulatory authorities to oversee the regulatory framework and enforcement at the national level.

Last year's edition of this report featured a chapter dedicated to the EMFA, as it is perhaps the most extensive and important piece of media-related legislation in the last decade.

This year's report dedicates discussion towards the MFF, as negotiations over the course of 2025 will be crucial to determining whether the EU's efforts to protect and support media freedom and pluralism will have the funds they need to achieve their goals. This section also provides important country-specific updates on governments' progress towards preparing for the enforcement of the EMFA's key elements, in August 2025, as well as towards transposing the Anti-SLAPP Directive, which must be done by May 2026.

The European Media Freedom Act

The EMFA represents a significant milestone for media freedom and pluralism in the EU. Some articles have already entered into force, while the remaining provisions of the EMFA will become almost fully applicable by August 2025, with the exception of Article 20, which will come into force in 2027. Article 20 grants users the right to modify the configuration of any device or user interface that controls or manages access to content, allowing them to tailor media offerings to their preferences. In 2024, two Commissioners were entrusted with a specific mandate on media policy, fostering cooperation between Directorates-General.

If properly enforced, the media legislation, including the EMFA, along with the AVMSD,

the DSA and the Anti-SLAPPs Directive has the potential to create a more pluralistic and safe media environment at the member state level and across the EU. In the recommendation section we urged the Commission to initiate infringement procedures against member states that systematically undermine media freedom and pluralism.

In several Member States, 2024 ended with little or no tangible progress toward preparing for the full enforcement of the EMFA. Some countries already enforce laws that align with and support the EMFA, but even they may have issues to address before August 2025.

In **Bulgaria**, reforms needed to bring the country in line with the EMFA stalled last year. Legislative action is still needed to strengthen the media regulator's independence, modernise the regulatory framework, improve the enforcement capabilities of oversight bodies, reform funding mechanisms, reduce political influence, and ensure public broadcasters operate independently. The situation is similar in France, where there are no plans to fully transpose the EMFA into French law. A bill²⁶² aimed at strengthening media independence

and enhancing protections for journalists was being debated in the Senate in autumn 2024, and it could incorporate some of the EMFA's specific requirements for protecting the confidentiality of sources and journalists.

In **Greece**, discussions to reform national media laws to align with the EMFA have occurred, but they have not yet led to actual changes to the regulatory framework.²⁶³ While some important elements of the EMFA do appear in Greek law, such as with regard to Articles 6 and 22, other important elements are missing. For example, there is no mandate that media market concentration assessments account for their potential impact on media pluralism.

The European Media Freedom Act has not yet brought about any legislation change in **Hungary**. Instead, the country vetoed the regulation and filed suit at the Court of Justice of the European Union, challenging the legal basis for the law and accusing the EU of censorship.²⁶⁴ According to an extensive report by the International Press Institute, the current legal framework does theoretically guarantee the independence of public service media, but in practice it is subject to regular

262 Sénat, Law proposal on strengthening media independence and better protect journalists (proposition de loi visant à renforcer l'indépendance des médias et mieux protéger les journalistes), 24 July 2024, <https://www.senat.fr/dossier-legislatif/ppl23-741.html>

263 Danai Maragoudaki, *Media Capture Monitoring Report: Greece Measuring Compliance with the European Media Freedom Act* International Press Institute, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Greece-Media-Capture-Monitoring-Report-1.pdf>

264 Márton Balázs: *The European Parliament voted on a law declaring the independence of public media, and Fidesz fears censorship. (A közmédiá függetlenségét kimondó jogszabályt szavazott meg az EP, a Fidesz cenzúrától tart)*, Telex, 13 March 2024, <https://telex.hu/kulfold/2024/03/13/eu-europai-parlament-media-kozmedia-szabadsag-fuggetlenseg>

governmental interference.²⁶⁵ Moreover, the method of funding PSM is too opaque, and there has been no action to address these or other outstanding issues.

Italy took no action in 2024 to introduce legislation needed to bring the country in line with the EMFA. There is no legislation to regulate the use of spyware or prohibit surveillance of journalists without judicial oversight. There are also significant concerns the funding and governance of the public broadcaster, in particular the manner of appointing its directors, is still open to direct political influence, in contravention to the EMFA.

Existing **Dutch** law is seen as largely compatible with the EMFA, and action was taken last year to identify and address gaps. In March of 2024, the State Secretary for Education, Culture and Science identified the following steps that must be taken:²⁶⁶ the establishment of an assessment mechanism for media pluralism and editorial independence in certain media market concentrations, the establishment of a database on ownership in the media sector, the right for users to easily adjust default settings on devices and interfaces according to their interests or preferences, and governmental

transparency on spending on state advertising and the allocation of public contracts to media service providers.

Like Hungary, **Slovakia** has been openly hostile to the European Media Freedom Act, and the Fico government took steps in 2024 that contravene the EMFA. Most significantly, in July 2024 the government abolished the existing public service television and radio station, Radio and Television of Slovakia (RTVS) and replaced it with a new institution, Slovak Television and Radio (STVR), that has the same function and purpose, but without the restrictions on government interference that protected the previous body. Such a move will be unlawful under the full enforcement of the EMFA.

The Anti-SLAPP Directive

The EU Anti-SLAPP Directive seeks to address a grave – and growing – threat to journalists, small and independent media outlets, and media watchdogs: strategic lawsuits against public participation (SLAPPs). These lawsuits are initiated with the sole purpose of silencing the victim by drowning them in

265 International Press Institute (IPI): *Hungary Media Capture Monitoring Report*, November 2024, <https://ipi.media/wp-content/uploads/2024/11/Hungary-Media-Capture-Monitoring-Report-Final-1.pdf>

266 Senate of the Netherlands, Proposal for a Regulation of the European Parliament and of the Council establishing a common framework for media services in the internal market (“Media Freedom Regulation”) and amending Directive 2010/13/EU (Voorstel voor een Verordening van het Europees parlement en de Raad tot vaststelling van een gemeenschappelijk kader voor mediadiensten op de interne markt («verordening mediavrijheid») en tot wijziging van Richtlijn 2010/13/EU), 36249 nr. K, 19 March 2024, <https://zoek.officielebekendmakingen.nl/kst-36249-K.html>

costly, time-consuming litigation until they choose to self-censor – perhaps to stop investigating a story, or to stop reporting on a certain politician or business – or can no longer afford to continue their work. These lawsuits are almost uniformly meritless, and if they were to go to court, the claimants would likely lose. They are, in effect, a weapon – lawfare used by the rich and powerful against those with far fewer resources.

The EU's new Directive²⁶⁷ aims to significantly curb the use of SLAPPs in Europe. Among its key provisions, the directive allows targets of SLAPPs to ask the court to dismiss manifestly unfounded claims at the earliest possible stage, in accordance with national law. If the court agrees and deems the claim unlawful, it may decide to assess all costs to the claimant, again in accordance with national law, including the legal costs of the victim. While the EU directive focuses on cross-border cases, Member States are encouraged to extend SLAPP protections to also cover purely domestic cases.

The EU Anti-SLAPP Directive entered into force in May 2024 and must be fully transposed by Member States by 7 May 2026. Many national-level civil society organisations have noted that despite the new law, SLAPPs remain a serious issue that persists across the EU. Early signs of Member States' action to align with the law are also not encouraging:

only one country, **Malta**, has fully transposed the legislation into national law, while in **Slovakia**, the Prime Minister even initiated his own SLAPP case against a journalist in 2024.

Belgium does not yet have legislation explicitly aimed at protecting victims of SLAPPs, nor did it make any progress in 2024 towards transposing the EU directive. In **Bulgaria**, however, 2024 brought more progress. A working group led by the Deputy Minister of Justice has been established to align Bulgarian law with the directive. The group includes representatives from the judiciary, academia, civil society, as well as the Ministry of Justice. Their primary focus is on developing amendments to the Civil Procedure Code (CPC), but initial discussions suggest changes may extend to the Judicial System Act and other relevant laws. In **Croatia**, meanwhile, there was no progress on the issue in 2024.

Following the collapse of **Germany's** governing coalition at the federal level in November, implementing the Anti-SLAPP Directive by the transposition deadline appears almost impossible. Without implementation, there is still a lack of statutory legal protection as well as state support mechanisms. In the absence of state-provided assistance, several civil society initiatives offering advice and support have emerged, including a contact

267 Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings 'Strategic lawsuits against public participation', <https://eur-lex.europa.eu/eli/dir/2024/1069/oj/eng>

point established in April 2024 for journalists affected by SLAPPs.²⁶⁸

Greece has yet to transpose the directive into national law, nor has the country fully aligned with the Council of Europe's recommendations to combat SLAPPs. This leaves critical gaps in the protection of press freedom and journalist safety in a country where journalists regularly face threats and harassment. The International Press Institute coordinated a joint statement urging Greek authorities to swiftly transpose the EU Anti-SLAPP Directive, highlighting the importance of protecting journalists and public participation, but still no action was taken in 2024.²⁶⁹

No progress has been made in **Hungary** to transpose the Anti-SLAPP Directive. The rise in SLAPP lawsuits highlights that has been observed over recent years demonstrates the urgent need to address this issue, but experts in the country view it as very unlikely that the government will adopt national legislation that progressive and more robust than the minimum called for in the EU directive.

Ireland's Defamation (Amendment) Bill 2024 is expected to transpose the EU's Anti-SLAPP Directive,²⁷⁰ but civil society organisations in the country argue the protections it will afford are inadequate.²⁷¹ The Ireland Anti-SLAPP Network has put forward three main recommendations to strengthen the bill: broaden the scope to include more SLAPP cases; add a clause that would require the claimant to demonstrate that their case is not unfounded as part of an early dismissal mechanism, placing the burden clearly on their side; and add a provision that would require the court to stay proceedings once an application for the early dismissal has been made.

Although **Malta** has transposed the directive, there are serious gaps and deficiencies in its bill. In August 2024, the Daphne Caruana Galizia Foundation, together with other civil society organisations, wrote to the Prime Minister and Ministry of Justice highlighting these shortcomings; the CSOs received no response and were not consulted prior to final passage of the legislation. Because of the law's shortcomings, the CSOs consider that no substantive progress

268 Contact point website: <https://www.noslapp.de/>

269 International Press Institute, *Press freedom organizations support Reporters United & Efsyn*, 22 November 2024, <https://ipi.media/greece-press-freedom-organizations-support-reporters-united-efsyn/>

270 Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation') https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401069

271 Joint Committee on Justice (Ireland), *Opening Statement on behalf of the Ireland Anti-SLAPPs Network Ireland*, Pre-legislative hearings- Defamation (Amendment) Bill (2023), 4 July 2023, https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_justice/submissions/2023/2023-07-04_opening-statement-jessica-nimhainin-index-on-censorship-et-al-iccl-anti-slapps-network_en.pdf

has been made towards protecting Maltese journalists and activists against SLAPPs.

In October 2024, the Ministry of Justice and Security published the draft law for implementing the European Anti-SLAPP Directive in **the Netherlands**. However, the proposed law does not provide sufficient protection for victims of SLAPPs in the Netherlands. In some respects, the minimum standards outlined in the EU directive are not even met, let alone the best practices recommended by the Council of Europe. The most pressing concerns with the draft implementation act include the lack of definition and indicators of a SLAPP and the bill's sole focus on cross-border cases.

In **Romania**, more than 90% of SLAPPs are national cases, not cross-border cases, and thus fall outside the scope of the EU directive. Because of this, it is imperative that implementation of the Anti-SLAPP Directive also extends its guarantees to cover national cases.²⁷² Despite this, in 2024 the Ministry of Justice expressed doubt that it would be possible

to extend the guarantees beyond what is called for in the Directive.²⁷³

There has been no progress to transpose the directive into **Slovakia's** national law. According to the government's Legislative Task Plan, approved just after the close of 2024, on 15 January 2025, the current government plans to transpose the Anti-SLAPP Directive by October 2025.²⁷⁴ Civil society organisations are urging the government to go beyond the directive by extending protections to solely national cases, but there is no assurance that this will happen.

In October 2024, the government of **Slovenia** took steps towards transposing the Anti-SLAPP Directive by approving the preliminary framework for drafting legislation on preventing SLAPPs, prepared by the Ministry of Justice.²⁷⁵ In a positive sign, the preliminary framework foresees legislation that will be broader in scope than the directive and will apply not only to cross-border cases but also to national cases. Moreover, it is still being considered whether the rules against

272 APADORCH, *Open letter against intimidation tactics used against free speech*, press-release signed by 30 NGOs, 5 November 2024 available: <https://apador.org/scrisoare-deschisa-impotriva-actiunilor-de-intimidare-privind-libertatea-de-exprimare/>

273 APADOR-CH, Facebook post, 16 December 2024 <https://www.facebook.com/APADOR.CH/posts/pfbid02NT-vmLXTU9WwiiQtq2oyqe6XUzM9g59YRaocKNdMx3NrVh8riGeKBVzRqmd7jYPGNI>

274 The Government's Legislative Task Plan and the related documents are available at: <https://rokovania.gov.sk/RVL/Material/30366/1>

275 For more information see the government website at <https://www.gov.si/novice/2024-10-10-vlada-potrdila-izh-odisca-zakonodaje-o-preprecevanju-slapp-tozbe/>. See also A.K., STA, *Vlada nad neutemeljene tožbe za osebe, ki se javno udejstvujejo*, 24ur.com, 10 October 2024, <https://www.24ur.com/novice/slovenija/vlada-nad-neutemeljene-tozbe-za-osebe-ki-se-javno-udejstvujejo.html>.

SLAPPs could be codified in such a way so as to also apply to criminal proceedings involving offences related to honour and reputation, and not only to civil proceedings.

The Multiannual Financial Framework

An outsized number of elections were held in 2024, one of which delivered a new European Parliament. A new European Commission was also appointed, setting the stage for the EU to redefine its priorities. These priorities will be reflected in the makeup of the EU's next long-term budget, the Multiannual Financial Framework (MFF) for 2028–2034. Negotiations are already underway and will continue in 2025.

The war in Ukraine and the connected spread of disinformation campaigns in Europe, the outcome of the U.S. elections and the recent decision by the U.S. administration to cut funding, including for independent media, and the changes in Very Large Online Platforms' policies regarding access to reliable information and their lobbying for deregulation,²⁷⁶ have brought insecurity and uncertainty. Against this backdrop, it is imperative that European institutions take more responsibility and show unwavering financial commitment towards upholding and developing a free and healthy media environment across the EU.

Media freedom and pluralism are essential to safeguard democracy and uphold the rule of law. The EU must ensure adequate financial support for independent media, to bolster freedom of expression and access to information, and to defend free and fair elections.

As highlighted in earlier chapters of this year's Media Freedom Report, the European media landscape faces systemic challenges. One of these is that the European media landscape is significantly underfinanced, which directly impacts media pluralism and the sector's resilience against influences from governments, Big Tech and publishers. Financial sustainability is a crucial bulwark against both public and private media capture, and it allows for the creation of a vivid independent and pluralistic media ecosystem, where small media outlets are supported and diverse views and opinions are shared.

We urge EU decision-makers to use the MFF negotiations to demonstrate their commitment to reversing the deeply troubling trends documented in this report. At the core of many of these problems is financial pressure on public service media, on regulatory bodies, on small and independent outlets, on digital literacy initiatives, and on law enforcement training to better protect journalists. Complicating this, the financial structure of the media sector has been significantly altered by the advertising system of Very Large Online Platforms,

276 Corporate Europe Observatory, *Deregulation Watch*, <https://www.corporateeurope.org/en/2025/03/deregulation-watch>

which claim at least 50% of the advertising revenue from publishers and content creators.²⁷⁷ VLOPs' opaque amplification techniques have also made access to information and quality media content more precarious. This reduces the accessibility of independent media and political content, weakening civic discourse, access to information, and the right to form opinions.²⁷⁸

These challenges are not isolated. New threats to Europe's media ecosystem come from across the Atlantic. The funding cuts of President Trump's administration are already being felt in Europe, posing an existential threat to small and independent media outlets. Now it is of utmost importance that the EU steps up. These small media outlets deliver an invaluable service, and legislators should use the MFF to support them. This is true for digital literacy initiatives as well. These are critical to building a strong understanding of digital media and critical thinking about the information

we come across. This is how the EU is able to nurture resilience against disinformation campaigns and an appreciation for what media freedom and pluralism provide.

Under the existing MFF, covering 2021-2027, there is funding for numerous projects that support and enhance media freedom and pluralism. Under the Horizon 2020²⁷⁹ and Horizon Europe funding program,²⁸⁰ the EU provides funding for research into the necessary link between democracy and the media, and the Citizens, Equality, Rights, and Values (CERV) program funds²⁸¹ civil society initiatives that uphold EU values, with funding also available for non-profit media outlets. Other MFF programs supporting media pluralism include Creative Europe and Digital Europe, and, as part of its Media and Audiovisual Action Plan, the Commission launched an €8 million funding call for projects that strengthen journalism partnerships in member states.

277 Patrick Holder et al., *Paying for News: What Google and Meta Owe US Publishers*, 13 November, 2023, <https://ipdcolumbia.org/wp-content/uploads/2024/08/Paying-for-News-What-Google-and-Meta-Owe-US-Publishers-%E2%80%94-Draft-Working-Paper.pdf>

278 Orsolya Reich and Sofia Calabese, *Beyond Disinformation: How DSA Risk Assessments Ignore Democracy's Real Threats*, 2025, <https://www.techpolicy.press/beyond-disinformation-how-dsa-risk-assessments-ignore-democracys-real-threats/>, see also *Civic Discourse and Electoral Processes in the Risk Assessment and Mitigation Measures Reports under the Digital Services Act*, 2025 <https://www.liberties.eu/f/ielo4z>

279 Horizon 2020, https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-2020_en

280 Horizon Europe funding program until 2027, https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe_en

281 *Citizens, Equality, Rights and Values programme overview*, https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/citizens-equality-rights-and-values-programme/citizens-equality-rights-and-values-programme-overview_en

All told, the current MFF includes €1.42 billion for the media strand of the Creative Europe programme for 2021-2027. This is the same amount Russia spent on media in 2021, even before the war in Ukraine.²⁸² It is insufficient to sustain a free and plural media landscape in Europe going forward, both because of rising costs generally and because of the increase in threats to media freedom across the bloc. This is especially true because, as documented in this report, threats to media freedom so often come from Member State governments themselves, rather than external pressures or threats. Those that exercise influence or even control over their media markets recognize the power that comes from controlling both access to information and the information itself. Allowing this influence over the media to continue only further entrenches these governments and weakens democracy.

We urge EU decision-makers not to lose sight of this, and to use the MFF negotiations to further independent media needs a strong institutional support that prevents them from being vulnerable to governments and oligarchs.

282 Aleksandra Michałowska-Kubś, *Coining lies. Kremlin spends 1.5 Billion per year to spread disinformation and propaganda*, 8 Aug 2022, <https://www.debunk.org/coining-lies-state-budget-financing-of-russian-propaganda>

Contact

The Civil Liberties Union for Europe (Liberties) is a non-governmental organization promoting and protecting the civil liberties of everyone in the European Union. We are headquartered in Berlin and have a presence in Brussels. Liberties is built on a network of national civil liberties NGOs from across the EU. Unless otherwise indicated, the opinions expressed by Liberties do not necessarily constitute the views of our member organizations.

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