

MONITORING MEDIA PLURALISM IN THE EUROPEAN UNION

Results of the MPM2026
Centre for Media Pluralism and Media Freedom

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REPORT JUNE 2026

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Editorial matter and selection © Tijana Blagojev, Konrad Bleyer-Simon, Elda Brogi, Roberta Carlini, Danielle Da Costa Leite Borges, Jan Kermer, Iva Nenadić, Marie Palmer, Pier Luigi Parcu, Urbano Reviglio, Matteo Trevisan, Sofia Verza, 2026

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Published by
European University Institute (EUI)
Via dei Roccettini 9, I-50014
San Domenico di Fiesole (FI)
Italy

doi:10.2870/3260290
ISBN:978-92-9466-825-7
QM-01-26-227-EN-N



Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or EACEA. Neither the European Union nor the granting authority can be held responsible for them.

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Foreword - An evolving media and information environment

It is increasingly evident that recent years have marked a constitutional turning point for media pluralism, democratic communication, and the governance of the digital public sphere.

The developments of 2025, characterised by significant geopolitical shifts and a growing crisis in US democracy, historically seen as a key reference point in discussions about freedom of expression and media freedom, have shown how media pluralism is strictly linked to broader geopolitical, technological, and economic changes that increasingly influence democratic communication on a global scale. Understanding these evolving dynamics is crucial for preserving democratic debate and reaffirming the role of free media and access to reliable information as foundational pillars of any contemporary democratic system.

Media pluralism has traditionally been understood through relatively stable categories. The concept is used to refer to the diversity of media ownership, the existence of independent journalism, a strong and independent public service media, and the capacity of citizens to access and be represented by a plurality of political and cultural viewpoints. In the European tradition, especially, media pluralism is closely linked to constitutional democracy itself. A pluralistic media system is considered indispensable for guaranteeing informed citizenship, political competition, public accountability, the functioning of the democratic and shared public sphere and the rule of law.¹

The digital transformation of communication has profoundly altered the institutional conditions under which pluralism operates. During the platform era, information flows are increasingly mediated by global digital platforms whose algorithmic architectures determine what users see, what remains invisible, what circulates virally, and what becomes politically salient. Recommendation systems, engagement optimization mechanisms, artificial intelligence models, and platform moderation policies have become central tools shaping public discourse, disrupting the role of journalism and the press as the fourth estate.²

New players have emerged in the digital information landscape and are becoming increasingly capable of shaping public opinion and influencing political and social discussions. Influencers, content creators, streamers, and independent digital personalities now play a central role in how information circulates, especially among younger audiences who primarily consume news through social media rather than traditional media outlets.³

This transformation is reshaping the public sphere by blurring the boundaries between journalism, entertainment, opinion, advertising, and political communication. While the rise of content creators can contribute to greater diversity of voices and forms of participation, it also raises concerns regarding transparency, accountability, disinformation, and the concentration of algorithmic power within digital platforms.

Recent years have witnessed an exponential rise of the use of Generative AI tools. Generative AI is transforming journalism at every stage of the editorial process. News organisations are increasingly using AI systems for transcription, translation, summarisation, content recommendation, data analysis,

1 Brogi, E., Nenadić, I., & Parcu, P. (2024). *Media Pluralism in the Digital Era*. Routledge.

2 OSCE (October, 2025) *Safeguarding Media Freedom in the Age of Big Tech Platforms and AI* <https://rfom.osce.org/representative-on-freedom-of-media/598525>

Observatory on Information & Democracy, (January, 2025) *Information ecosystem and troubled democracy. A Global Synthesis of the State of Knowledge on News Media, AI and Data Governance*, <https://observatory.informationdemocracy.org/report/information-ecosystem-and-troubled-democracy/>

3 Digital news report (2025) https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital_News-Report_2025.pdf

and even automated article generation. These technologies can improve efficiency, reduce production costs, and facilitate multilingual communication. In investigative journalism, AI can also assist reporters in analysing large datasets and identifying patterns that could otherwise remain hidden. However, these opportunities are accompanied by significant risks. The growing reliance on automated systems may contribute to the homogenisation of news production, reduce editorial diversity, and increase the dependence of media organisations on large technology companies that control AI infrastructures.

At the same time, AI is profoundly altering the way citizens access information. Generative AI systems that are integrated into search engines and digital platforms increasingly provide direct answers and summaries tailored for ‘an audience of one,’⁴ rather than directing users toward original news sources. This shift also has major implications for journalism sustainability because it reduces traffic to publishers’ websites and further weakens traditional advertising-based revenue models. As AI systems create a further level of intermediation between users and information, technology companies acquire unprecedented influence over what content becomes visible, credible, and relevant within the public sphere.

This transformation has intensified tensions between media organisations, platforms, and AI companies in Europe.⁵ Publishers and journalists increasingly argue that AI systems rely heavily on journalistic content for training and information retrieval without adequately compensating those who produce original reporting. The debate therefore concerns not only intellectual property rights, but also the broader sustainability of independent journalism. A 2026 judgment of the Court of Justice of the European Union in the case *C-797/23 Meta Platforms Ireland* confirmed that online plat-

forms may be required to provide fair remuneration to publishers for the use of press content online. The ruling strengthens publishers’ rights under the EU Copyright Directive and represents a significant legal step toward rebalancing the relationship between dominant digital platforms and the economic sustainability of journalism, while also recognising the connection between fair compensation, media pluralism, and democratic resilience.

AI also plays a role in the growing disinformation crisis. Generative technologies have dramatically lowered the cost and speed of producing disinformation, deepfakes, manipulated images, and synthetic audio. These tools facilitate the spread of disinformation campaigns that can influence elections, polarise societies, and undermine trust in democratic institutions. In response, the European Union is increasingly treating AI-driven disinformation as a systemic risk that requires stronger platform accountability.

Ultimately, the relationship between media, platforms and AI is becoming a significant constitutional issue for democratic societies. The relationship concerns not only technological innovation, but also the prominence of content of public interest, democratic sovereignty, freedom of expression, public trust, and the governance of digital infrastructures that increasingly shape collective understanding and political participation.

The Media Freedom Act

In the European Union, the year 2025 witnessed one of the most significant institutional developments in the media sector, that is, the European Media Freedom Act-EMFA (Regulation (EU) 2024/1083) which became fully applicable across the European Union in August 2025. The European Media

⁴ Council of Europe (2025) Guidance Note on Generative AI Implications for Freedom of Expression, <https://rm.coe.int/cdmsi-2025-15rev-guidance-note-on-the-implications-of-generative-artif/488029df80>

⁵ Dodds, T., Mine, N., Helberger, N., Guzman, A. L., & Diakopoulos, N. (2026). AI Hype in Journalism: Visibility, Power, and the Politics of Media Narratives. *Digital Journalism*, 14(2), 207-219. <https://www.tandfonline.com/doi/pdf/10.1080/21670811.2026.2630187>
Mattis, N., & De Vreese, C. (2025). Generative AI and Disinformation| Breaking the News? Generative AI’s Impact on Journalism and Its Implications for Disinformation. *International Journal of Communication*, 19, 24-24. <https://ijoc.org/index.php/ijoc/article/view/25448/5135>

Freedom Act represents the European Union's first comprehensive regulatory framework specifically dedicated to the media sector, with the aim of safeguarding media freedom, pluralism, and editorial independence as essential democratic values and as key conditions for the proper functioning of a healthy media market. The regulation introduced safeguards concerning editorial independence, public service media governance, transparency of media ownership, state advertising allocation, protection of journalists against surveillance technologies, and oversight of media concentration processes. More importantly, the EMFA reflected a broader European understanding that media pluralism had become inseparable from democratic resilience.

The adoption and implementation of the EMFA occurred in a context marked by growing concerns about media capture, political interference, and the concentration of ownership in several European countries. Reports by civil society organisations, journalists' associations, and academic observatories repeatedly warned that economic fragility, declining advertising revenues linked to the increasing role of online platforms in the market, the rise of AI, and political polarisation were weakening the sustainability of independent journalism.

Now that the EMFA is fully applicable, the central challenge is no longer only the adoption of common rules, but rather their effective and consistent implementation across the Member States. The success of the Regulation will ultimately depend on the capacity of European and national institutions to ensure that its principles are translated into concrete regulatory practices and measurable outcomes.

In this context, Article 26 of the EMFA assumes particular importance, as it highlights the need for mechanisms capable of monitoring, evaluating and assessing the implementation and impact of the Regulation throughout the Union. Effective implementation cannot rely solely on formal legal transposition or institutional declarations. It requires contin-

uous measurement, comparative analysis, and evidence-based evaluation of how the rules operate in practice within rapidly evolving and complex media ecosystems. This is essential at both national and European levels.⁶

Against this background, it is crucial to acknowledge the April 2026 judgment in *Commission v Hungary (C-769/22)* where for the first time the Court of Justice of the EU explicitly recognised that the values enshrined in Article 2 of the TEU are not merely political principles, but legally enforceable obligations binding all Member States. The ruling strengthens the role of the EU as a community founded not only on economic integration, but also on democracy, equality, human dignity, and fundamental rights. It also signals a more assertive approach by the Court in addressing systemic rule of law backsliding within the Union.

Beyond the specific Hungarian legislation at issue, the judgment has broader implications for media freedom, pluralism, and democratic discourse. By affirming that discrimination, restrictions on expression, and limitations affecting access to information may violate the foundational values of the Union, the Court reinforces the idea that democracy and fundamental rights related to information are inseparable from the functioning of the European legal order.

The decision may, therefore, become an important precedent for future cases linking democratic resilience, media regulation, and the protection of European constitutional values.

The MPM2026

The release of the 2026 edition of the Media Pluralism Monitor (MPM) comes, once again, at a time marked by significant uncertainty and increasing vulnerability in democratic systems. As we have highlighted in previous editions, media freedom and pluralism are facing mounting pressures from

⁶ Parcu, P.L., (2026), Media pluralism after the EMFA: time for a European monitor, EUI Ideas <https://euideas.eui.eu/media-pluralism-after-the-emfa-time-for-a-european-monitor>

geopolitical instability, political polarisation, technological disruption, economic concentration, and the rapid evolution of the digital information landscape. The events of 2025 have intensified these concerns, making a response to them even more urgent. This current period is not only a stress test for democratic systems but also a critical examination of the resilience of the European public sphere itself.

In the increasingly complex informational environment, the Media Pluralism Monitor continues to adopt a holistic approach capable of capturing and interpreting the multifaceted nature of the transformations affecting media freedom and pluralism across Europe.

Acknowledgements

As every year, we take the opportunity to express our deep gratitude to the dedicated CMPF team and to the extensive network of national researchers throughout Europe that make the MPM data collection and analysis possible. Their expertise, commitment, and professionalism are what make the Media Pluralism Monitor an increasingly important source of information for academics, policymakers, media, journalists and citizens, year after year. As every year, we remain convinced, now more than ever, that monitoring the structural conditions of media pluralism is essential for safeguarding media freedom and pluralism in Europe and for testing the temperature of our democracies in these troubled times.

The MPM Team



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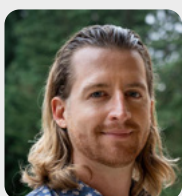
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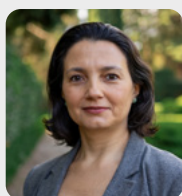
Matteo Trevisan is a Research Associate at the CMPF, where he supervises the Political Independence area of the MPM. His research focuses on the wide range of mechanisms for political capture of private and public media, with a particular attention to the new challenges enabled by the digital realm.



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List of acronyms

- ACM** Authority for Consumers & Markets (*Autoriteit Consument & Markt*)- the Netherlands
- AGCOM** Authority for Guarantees in Communications (*Autorità per le Garanzie nelle Comunicazioni*) - Italy
- AI** Artificial Intelligence
- AIA** Artificial Intelligence Act
- ALIA** Luxembourg Independent Audiovisual Authority (*Autorité luxembourgeoise indépendante de l'audiovisuel*)
- ALIM** (*Autorité luxembourgeoise indépendante des médias*)
- AMA** Audiovisual Media Authority (*Autoriteti i Mediave Audiovizive*)- Albania
- ARCOM** Regulatory Authority for Audiovisual and Digital Communication (*Autorité de régulation de la communication audiovisuelle et numérique*)- France
- AVMS** Audiovisual media services
- AVMU** Agency for Audio and Audiovisual Media Services (*Агенција за аудио и аудиовизуелни медиумски услуги*) - The Republic of North Macedonia
- AZOP** Croatian Personal Data Protection Agency
- BİK** Press Advertisement Agency (*Basın İlan Kurumu*) - Türkiye
- BNR** Bulgarian National Radio (*Bălgarsko nacionalno radio*)
- BNT** Bulgarian National Television (*Balgarska natsionalna televizija*)
- CASE** Coalition Against SLAPPs in Europe
- CCPC** Competition and Consumer Protection Commission
- CEM** Council for Electronic Media - Bulgaria
- CMPF** Centre for Media Pluralism and Media Freedom
- CNA** National Audiovisual Council - Romania
- CNMC** National Commission on Markets and Competition (*Comisión Nacional de los Mercados y la Competencia*) - Spain
- CSAT** Romanian National Defense Council
- DPA** Data Protection Authority
- DSCs** Digital Services Coordinator(s)
- DSA** Digital Services Act
- EDMO** European Digital Media Observatory

EMFA European Media Freedom Act

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

EU European Union

FIMI Foreign Information Manipulation and Interference

FTTP Fibre to the Premises

GAFAM Google, Apple, Facebook, Amazon, Microsoft

GDP Gross Domestic Product

GDPR General Data Protection Regulation

HAKOM Croatian Regulatory Authority for Network Industries

HRT Croatian Radiotelevision (*Hrvatska radiotelevizija*)

IMY Swedish Authority for Privacy Protection

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

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

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

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

MPM Media Pluralism Monitor

MFRR Media Freedom Rapid Response

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

MSP(s) Media Service Provider(s)

EOM ODIHR election observation mission

STVR Slovak Television and Radio

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

NRA(s) National regulatory authorities

OSCE-ODIHR Organization for Security and Co-operation in Europe
- Office for Democratic Institutions and Human Rights

PSM Public Service Media

RAI Italian Radio Television (*Radiotelevisione Italiana*)

RSF Reporters Without Borders (*Reporters Sans Frontières*)

RSPP Radio Spectrum Policy Programme

- RTÉ** Ireland's National Television and Radio Broadcaster (*Raidió Teilifís Éireann*)
- RTCG** Radio Television of Montenegro (Radio-televizija Crne Gore)
- RTS** Radio Television of Serbia (Radio-televizija Srbije)
- RTS** Radio and Television of Slovakia
- RTV** Radio-Television Slovenia (*Slovenija Radiotelevizija Slovenija*)
- RTVE** Spanish Broadcasting Corporation (*Corporación de Radio y Televisión Española*)
- RTVS** Radio and Television of Slovakia (RTVS) - Former Slovakian PSM
- SGP** Reformed Political Party (*Staatkundig Gereformeerde Partij*) - The Netherlands
- SLAPP** Strategic Lawsuits Against Public Participation
- STVR** Slovakian Radiotelevision (*Rozhlas a televízia Slovenska*)
- SVT** Swedish Television (*Sveriges Television*)
- TRAFICOM** Transport and Communications Agency (*Liikenne-ja Viestintävirasto*) - Finland
- TTPA** Regulation (EU) 2024/900 on the transparency and targeting of political advertising
- TSN** French digital service tax (*Taxe sur les services numériques*) - France
- TVP** Polish Television (*Telewizji Polskiej*)
- VLOP(s)** Very Large Online Platform(s)
- VLOSE(s)** Very Large Online Search Engines
- VHCN** Very High Capacity Network
- VSPs** Video-sharing platform(s)

Preliminary Note on the MPM 2026

The Media Pluralism Monitor (MPM) is a diagnostic tool developed by the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute. Implemented every year since 2020, and evolving since 2014, the MPM evaluates, using a normative approach, potential risks to media pluralism within EU Member States and can-

didates. It offers a comparative perspective between countries as well as a longitudinal analysis of the risks over time. For this 2026 edition, the MPM conserved its focus on four key areas of media pluralism — Fundamental Protection, Market Plurality, Political Independence, and Social Inclusiveness — and fine-tuned 20 key indicators (See Table 1).

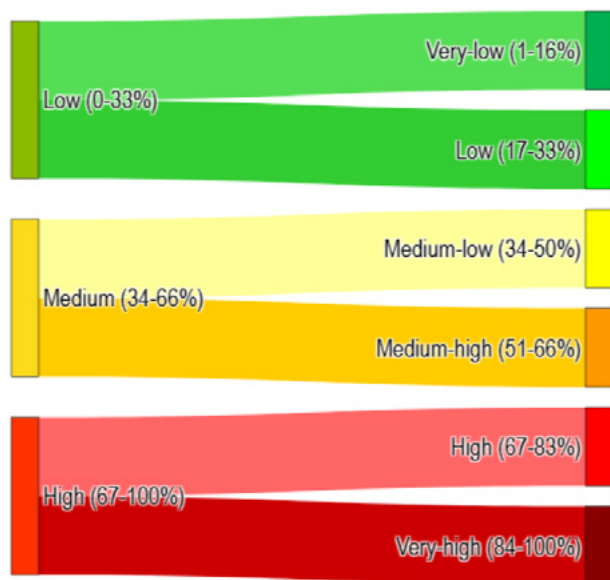
Table 1: Areas and Indicators of the Media Pluralism Monitor

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

For MPM2026, the MPM underwent significant transformations.

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

For MPM2026, the six-tier system remains in place.



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

Second, this report includes insights on a selection of themes related to the EMFA. Most of the standards established by the EMFA were already included in the MPM questionnaire, and have therefore been assessed through its successive implementations. However, for MPM2026, the CMPF team has made an even more concerted effort to shed light on these EMFA-related standards and to propose an analysis on the state of play of EMFA after its entry into force.

Third, this report dedicates a separate chapter to the analysis of media pluralism and freedom in the EU candidate countries. Candidate countries have specific challenges that cannot necessarily be compared to the challenges facing EU Member States and so need to be analysed separately. Besides, the fact that the new EMFA regulation does not apply directly to candidate countries creates the need for a separate assessment. This chapter focuses on the traditional MPM standards and includes precise recommendations tailored to the countries studied.

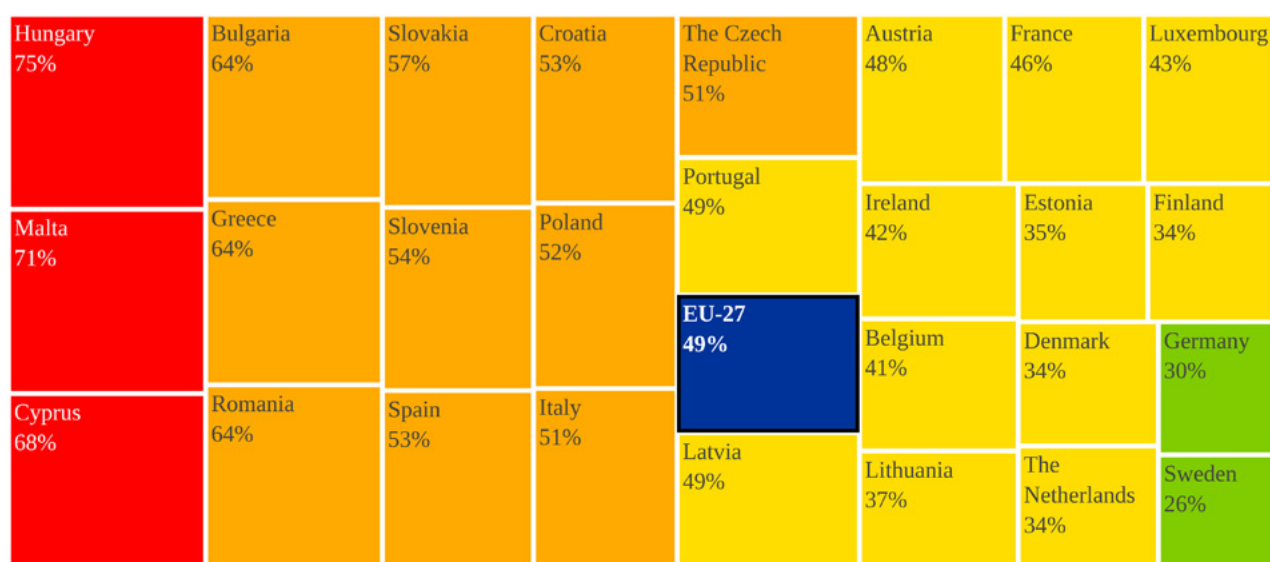
Finally, as for every edition of the MPM, the CMPF has updated and fine-tuned the questionnaire, taking into account the evolution of information, the media sphere, as well as of society in general, considering the existence of available data, and based on the experience obtained from previous implementations of the tool. Therefore, the MPM results for 2026, while conceptually and theoretically in line with the past analyses, are not strictly comparable with the specific results of previous editions. The details of these methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

Chapter 1

Results Snapshot

1.1. MPM2026 General Ranking

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



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Figure 1.a. MPM2026 - General ranking treemap - EU-27

The MPM2026 general ranking shows that:

- No Member State falls into the extreme risk bands (i.e. very-high/very-low), however, in this year's assessment, two Member States—Malta and Cyprus—join Hungary in the high-risk band.
- Most Member States converge on the medium-risk category, with ten Member States falling in the upper band (medium-high) and twelve falling in the lower band (medium-low).
- The mean risk score for the EU-27 is 49%, which is consistent with last year's result.
- The persistently high score (MPM2020–MPM2026) in the Market Plurality area recorded across all Member States indicates a systemic EU-wide vulnerability in the media market.
- Hungary—on the cusp of the very-high-risk band—stands out as the worst-performing country, closely followed by Malta and Cyprus, which have slipped into the high-risk band. In a

similar pattern to previous years, Hungary and Malta register particularly high-risk scores in the areas of Market Plurality and Political Independence, whereas Cyprus exhibits a particularly high-risk profile in the Market Plurality and Social Inclusiveness areas. The worst-performing Member States tended to score particularly poorly in the Market Plurality area.

- Bulgaria, Greece and Romania (medium-high) are on the verge of the high-risk band, registering especially high scores in the Market Plurality and Social Inclusiveness areas.
- Member States in the medium-high risk band score relatively similarly in terms of Fundamental Protection, with most countries falling in the medium-low risk category, but exhibit more heterogeneity in terms of risks to Political Independence. The Czech Republic is a notable outlier in

the medium-high risk band group, with high variability in risk scores across the four areas.

- The countries in the medium-high risk band may be broadly divided into two groups: the first group—The Czech Republic, Italy and Slovenia—generally registered more extreme values, especially in Market Plurality, and Social Inclusiveness in the case of the Czech Republic. Instead, the risk scores of the second group—Spain, Poland, Slovakia and Croatia—are distributed more evenly across the four areas.
- Member States in the medium-low risk band generally display rather high Market Plurality but comparatively lower Political Independence and Fundamental Protection risk profiles.
- Only two Member States—Sweden and Germany—fall in the low-risk band. These Member States broadly demonstrate strong Fun-

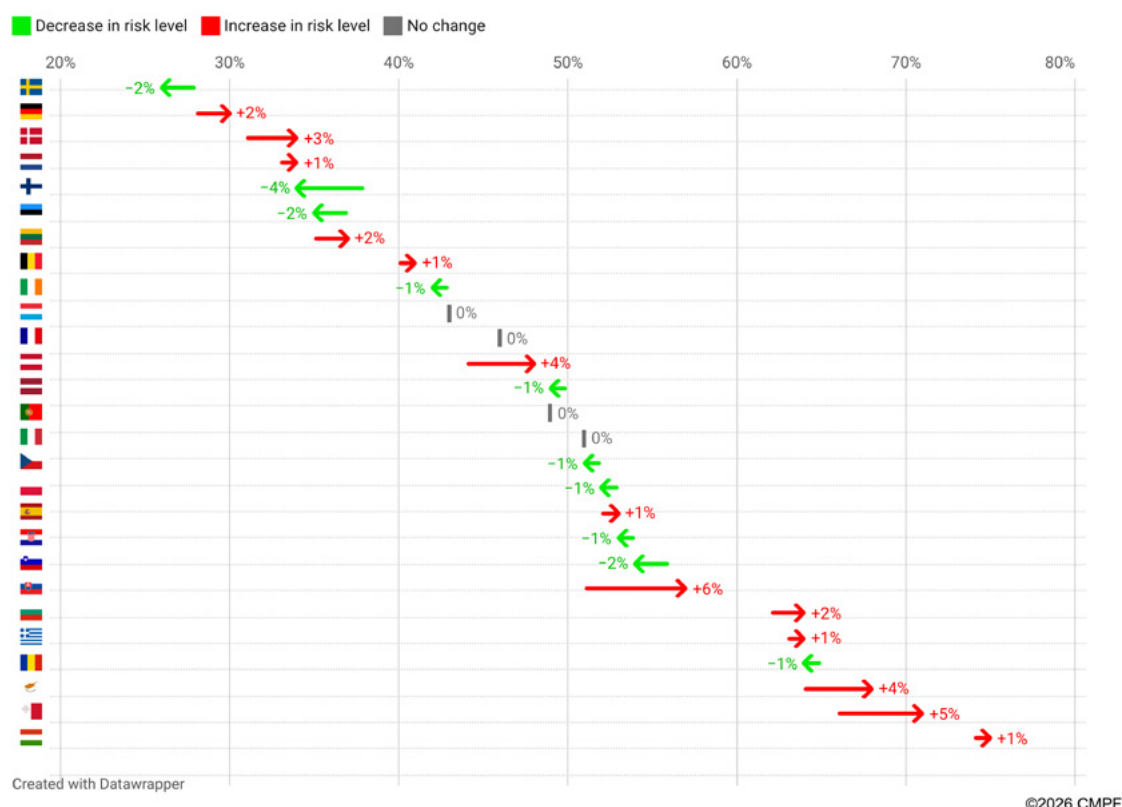


Figure 1.b. MPM2026 - General ranking - arrow plot showing changes in the overall risk score from MPM2025-MPM2026

damental Protection and Political Independence safeguards; however, they are not immune to the (digital) media market concentration and media viability issues facing all Member States. In Germany and Sweden, gender equality in the media is still problematic, with both Member States falling in the medium-low risk band.

- Compared to MPM2025, Finland saw the greatest improvement in the aggregate risk score (-4pp) whilst Slovakia saw the greatest deterioration (+6pp).
- Other noteworthy increases in risks were registered in Malta (+5pp), Austria (+4pp) and Cyprus (+4pp).
- Concerning regional trends, the choropleth map (see Figure 1.c) displays familiar patterns of North European and Scandinavian Member

States registering the lowest overall MPM risks, followed by the Baltic Member States, Southern European Member States and the worst-performing Member States located in Central and Eastern Europe.

- This year, eight out of twenty indicators score on (EU-27) average, above 50%. This includes all the indicators related to Market Plurality, two indicators from Social Inclusiveness and one in Political Independence. This means that the most significant risks to media pluralism are concentrated in the market, particularly related to media concentration and the growing influence of digital platforms, while declining viability of the media exposes the newsrooms to increasing threats to their editorial independence both from economic and political actors. At the same time, challenges related to editorial and political

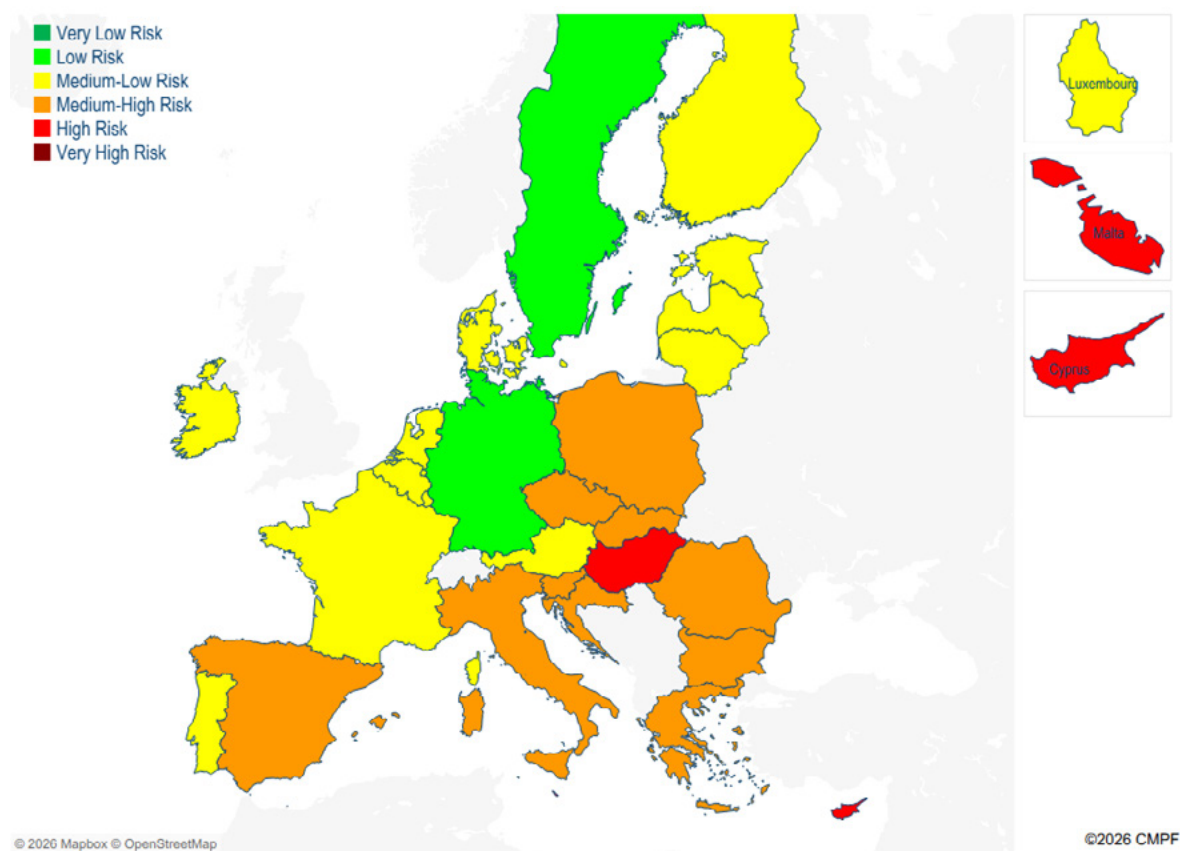


Figure 1.c. MPM2026 - General ranking - map of the countries by risk level

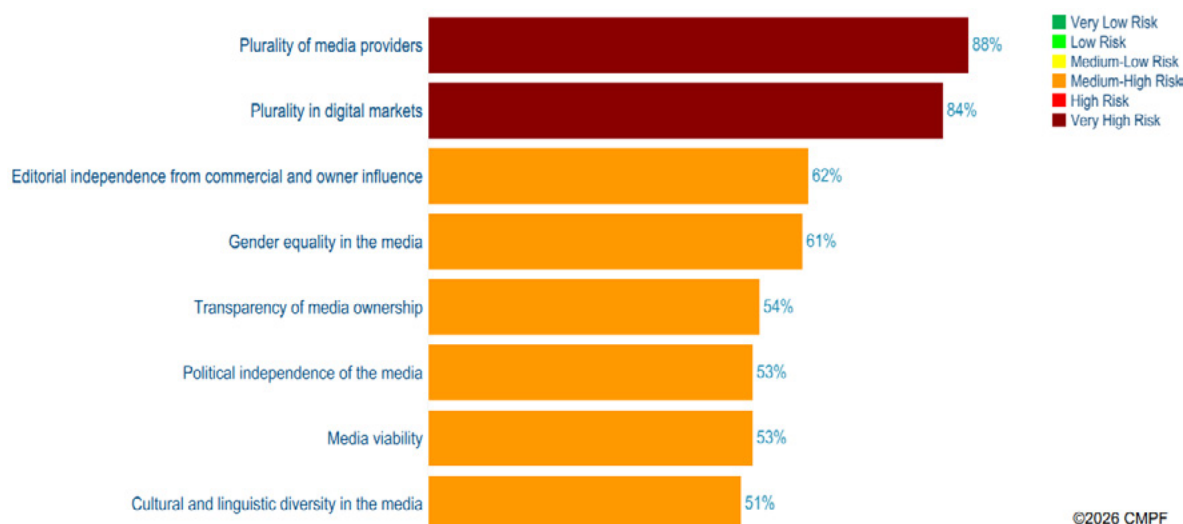


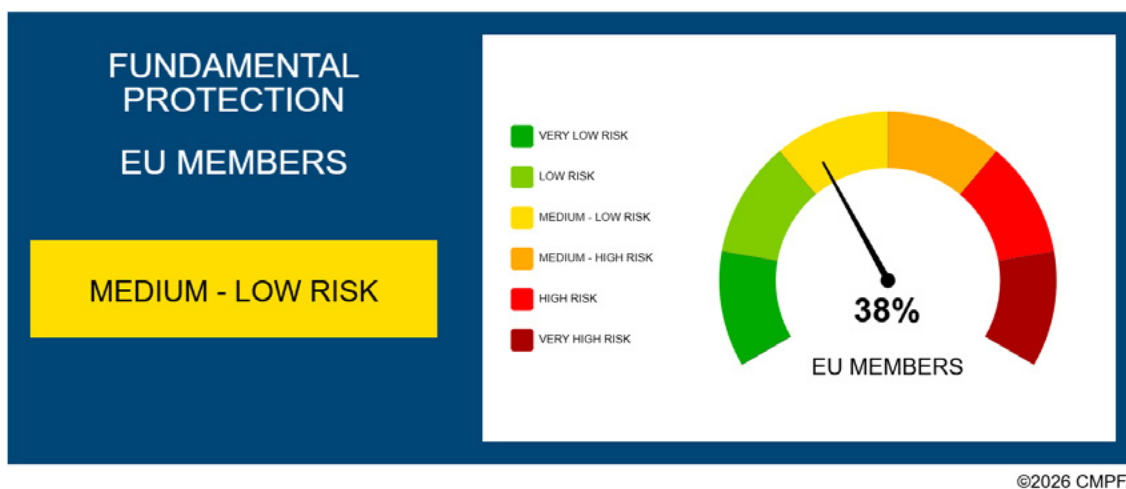
Figure 1.d. MPM2026 - The most problematic indicators

independence and gender equality indicate that issues extend beyond market dynamics.

- Following the patterns found in previous years, the indicators in the Market Plurality area are recorded as the most problematic of the entire monitor. Two indicators in this area—**Plurality of media providers** and **Plurality in digital markets**—score at very high risk; these indicators assess risks related to market power, both in terms of production (i.e. concentration of ownership of the media service providers) and distribution/access (i.e. concentration of the digital intermediaries, such as very large online platforms (VLOPs), search engines (VLOSEs) and, more recently, Generative-AI models). It is noteworthy that every Member State either falls in the high-risk or very-high risk band for these two indicators. The very high-risk level of these indicators reflects both the oligopolistic tendencies of traditional media sectors and the fact that these trends are not only mirrored, but reinforced, in the digital media environment.
- **Editorial independence from commercial and owner influence** is also a widespread risk, with over half of EU Member states falling into the high or very-high risk band and two-thirds falling into the medium-high-risk band.
- As regards the **Transparency of media ownership**, the results exhibit more heterogeneity among Member States, with nine falling within the high and very-high-risk categories, twelve are in the middle range (medium-low to medium-high risk), and six are in the lowest-risk bands (low or very low risk). Member States scoring in the lower risk levels (very-low/low) already have comprehensive media ownership transparency laws, covering direct, indirect and beneficial ownership, with effective disclosure mechanisms and public access to data. Member States in the mid-risk categories (medium-low/medium-high) only partially meet the EMFA transparency requirements, although some are in the process of updating their legislation. High and very-high-risk Member States lack alignment with the EMFA standards altogether, with the latter having taken no steps toward reform.
- **Media viability** is a long-standing issue, and this year is no exception, with most Member States converging on the medium-risk band, although Cyprus and Romania are notable outliers, scoring very-high and high-risk, respectively.

- Similar to last year, the indicators comprising Social Inclusiveness—in particular **Gender equality in the media**—registers heightened risk scores across much of the EU, with roughly half of the Member States either falling in the medium or high-risk bands, reflecting a systemic issue of a persistently male-dominated media environment in the EU. It is important to underline that this issue has been the highest scoring indicator since the MPM2020 outside of the Market Plurality area, reflecting the fact that parity is far to be achieved in either media content or media management. Only two Member States, namely Croatia and Finland fall in the low-risk bands (low risk and very low risk, respectively).
- Like last year, **Cultural and linguistic diversity** (previously called “Representation of minorities in the media”) remains an acute risk across most Member States, with only three Member States falling in the very-low-risk category. The risk is mostly linked to the absence of a comprehensive and coordinated strategy to prevent the spread of hate speech in most of the EU Member States.
- In the EU-27, the average score for **Political independence** of the media deteriorated to the medium-high risk category. This is due to a combination of deficient safeguards preventing political actors from owning media either through direct and/or indirect means, evidence of actual ownership control in several Member States, emerging risks linked to geopolitical developments, and opaque ownership patterns in the digital native sphere.

1.2 MPM2026 Main Trends per Area



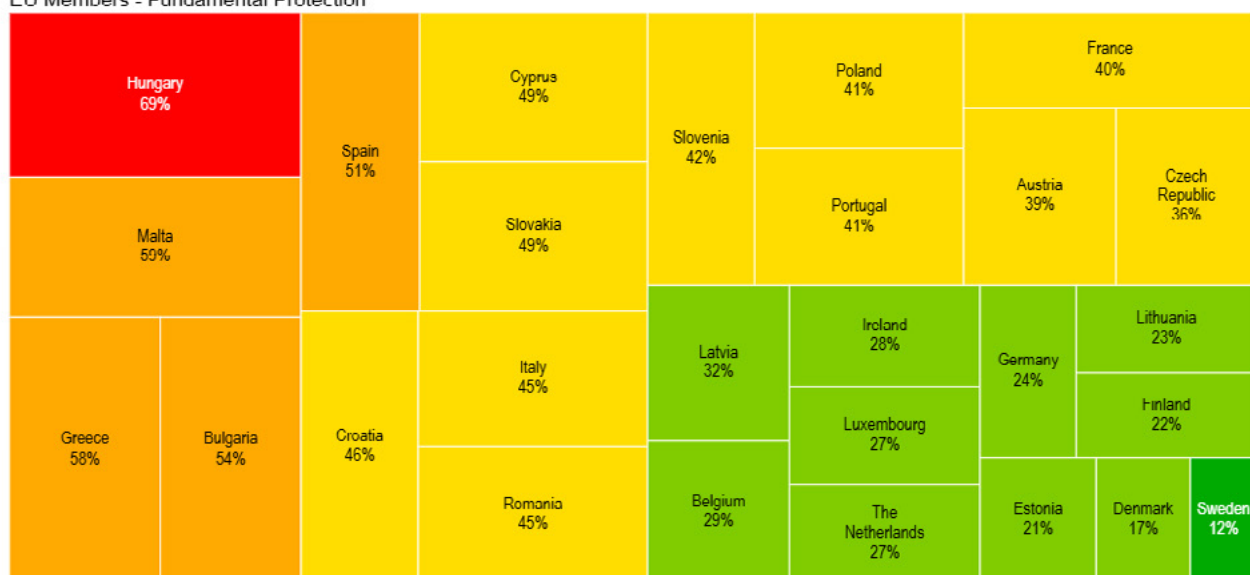
*The **Fundamental Protection** area of the MPM analyses the requirements for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression, offline and online; the right to seek, receive and impart information; favourable conditions for free and independent journalism (in terms of both working conditions and safety of journalists from physical, verbal and legal harassment); and the presence of independent and effective media authorities.*

- The right to freedom of expression and assembly is increasingly at stake in the context of public demonstrations, with risks for the physical safety of journalists and cases of temporary arrests of media operators in these contexts.
- The transposition of the EU Anti-SLAPP Directive in the national frameworks continues. The phenomenon of vexatious lawsuits nonetheless continues to be a significant issue throughout the EU and is especially used to intimidate those who work on the topics of corruption, government-related themes and the environment.
- Smear campaigns and verbal attacks by politicians against journalists, especially women journalists, are increasingly taking place, undermining media workers' reputations and causing chilling effects.
- There are increasing threats to the digital safety of journalists, including spoofing through the use of deepfakes and illegal surveillance of journalists and their sources.
- The working conditions of journalists, in terms of salaries and social security schemes, are deteriorating. This, together with the other threats listed, impact journalists' physical and mental wellbeing.
- The repeated denial of Freedom of Information (FOI) requests and the misuse of exceptions persist across several Member States.
- Awareness of whistleblower protection rights under national legislation remains insufficient among the general public.
- Measures to address disinformation or foreign

information manipulation and interference (FIMI) remained dispersed and uncoordinated in many of the countries assessed.

- Content moderation by online platforms is considered opaque. Although platforms provide transparency reports, they do not go into sufficient detail to assess the impact of moderation decisions on freedom of expression. Fears of both over-blocking and inaction in the face of illegal content prevail.
- The independence of national regulatory authorities (NRAs) from political pressures is still at stake.
- The increasing tasks assigned to NRAs through new EU media policies (especially, EMFA and the DSA) require more adequate budget, human and technical resources.
- In the **Fundamental Protection** area, Hungary scores a high-risk level, rising from last year when the country was assessed at medium-high risk level. One of the main causes relates to the deteriorating **Protection of information integrity**, due to the blocking of Ukrainian websites within the country's territory. Meanwhile, evidence of online platforms' lack of cooperation limited the effectiveness of out-of-court dispute resolution.
- Four countries are assessed to be in the medium-high risk level for the **Fundamental Protection** area, namely Malta, Greece, Bulgaria and Spain. The latter falls in this risk threshold as a new entry (in MPM2026, it scored medium-low in this area). Again, one of the main causes is related to a deterioration of the **Protection of information integrity**, in relation to transparency measures and the effectiveness of out-of-court dispute resolution.
- A significant risk increase in Spain can also be identified for the indicator on **Journalistic profession, standards and protection** as well as for the **Independence and effectiveness of national regulatory authorities**. Structural job insecurity adds to increasing physical and verbal violence against media professionals; and the Spanish media authority CNMC, also entrusted with new responsibilities as Digital Services Co-ordinator, lacks a proportionate budget increase, together with transparent budget allocation.

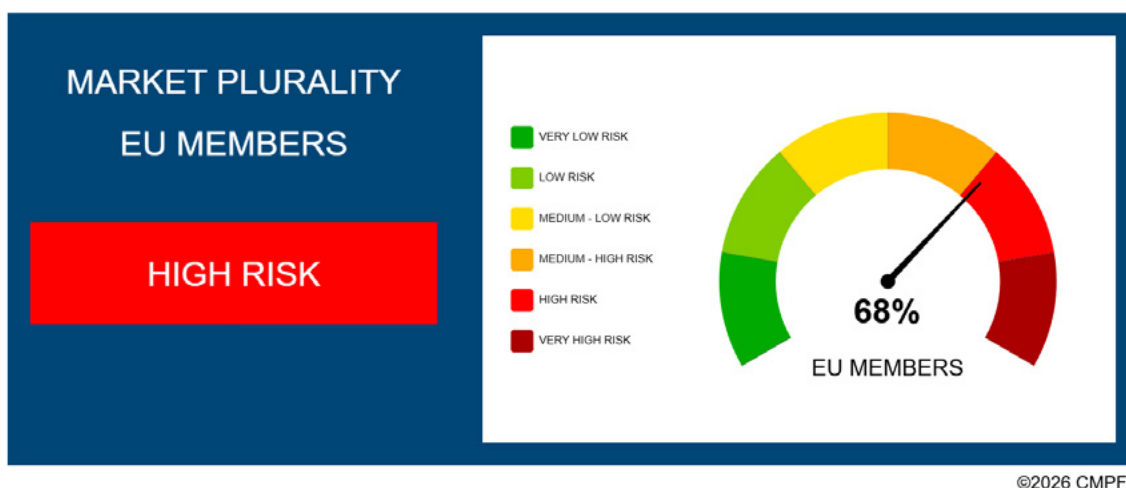
EU Members - Fundamental Protection



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

- Eleven countries score a medium-low risk in the **Fundamental Protection** area. Compared to MPM2026, the most significant risk increases were found in Austria, and Slovakia, in particular.
- In Slovakia, increased risks have been identified regarding the **Protection of information integrity**, the **Protection of the right to information** and the **Independence and effectiveness of national regulatory authorities**. Actions against disinformation have shown significant shortcomings and deficiencies in public reporting that made it hard to assess content moderation measures; there was an attempt by the ruling coalition to abolish the Office for the Protection of Whistleblowers; and concerns for the independence of the Slovak media authority, which has also been appointed as DSC, increased in 2025 when the parliamentary majority appointed six new members to the nine-member Council.
- In Austria, increased risks have been identified regarding the indicators on **Journalistic profession, standards and protection** and **Independence and effectiveness of national regulatory authorities**. Regarding the former, harassment, particularly sexual harassment, is increasingly common, especially against women and on social media. Unemployment in the profession is on the rise. Regarding the latter, although additional funds have been allocated, the new responsibilities arising from EU legislation are making KommAustria's financial and human resources appear increasingly inadequate.
- Among the countries that scored low-risk in this area, it is worth mentioning Germany and Denmark, which moved from a very-low risk assessment in MPM2026 to low-risk in MPM2026. The increase in risk score is particularly relevant for Germany, especially with regards to the **Protection of freedom of expression** and the indicator on **Journalistic profession, standards and protection**. The draft law aimed at transposing the anti-SLAPP Directive does not cover domestic lawsuits, despite the latter constituting the majority of the inquiries received by the NO-SLAPP Contact Point. Moreover, freedom of expression and assembly, as well as academic freedom have been stifled—particularly in relation to protest expression linked to Palestine solidarity activism, climate protests and the far-right. In these contexts, the physical and online safety of activists and journalists is increasingly at risk.
- A common problem for many EU countries, independent of their collocation across the risk bands, is the budgetary independence of NRAs. The adequacy of their technical and human resources is also at stake, considering the increasing tasks entrusted to them by the DSA and EMFA.



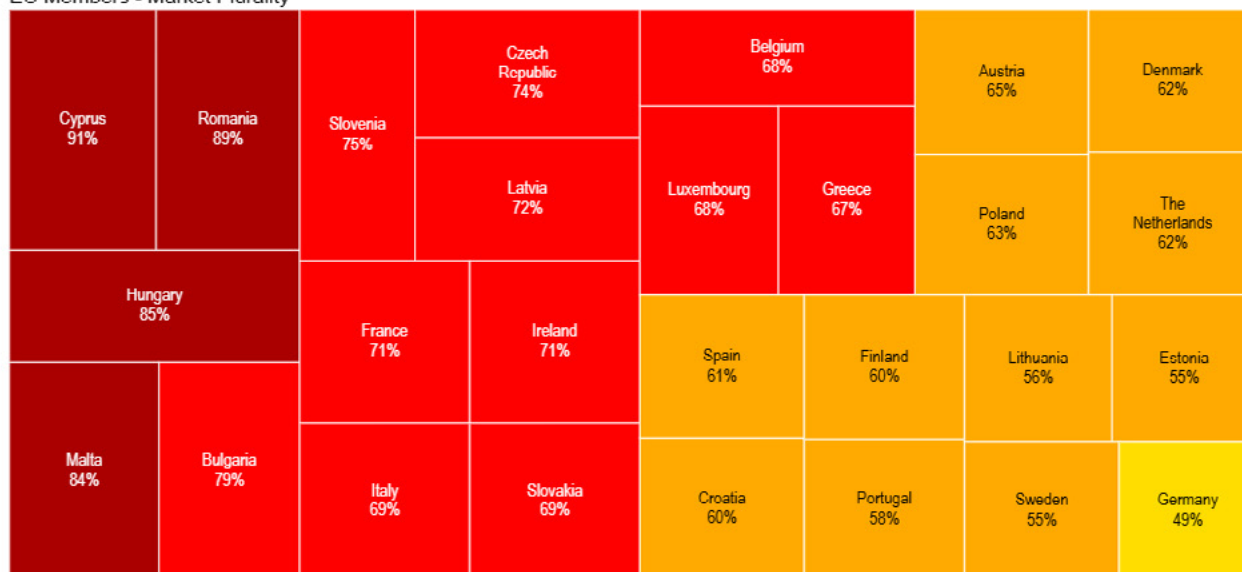
The **Market Plurality** area considers the economic factors that impact the plurality of media offer, assessing the risks deriving from insufficient transparency and high concentration of media ownership, economic sustainability of the media, and the undue influence of commercial interests and ownership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

- The **Market Plurality** area is at high-risk across the EU as a whole, with the same risk score as last year. None of the indicators that make up this area show any significant changes in risk compared to last year.
- The indicator on **Transparency of media ownership** falls within the medium-high risk band, showing a slight increase from last year's assessment. However, considering the changes introduced to the indicator in MPM2026, which incorporate the obligations under Article 6(1) and (2) EMFA, the results of the indicator reveal that several EU countries are lagging behind in the operationalisation of the new transparency obligations.
- In the vast majority of Member States, not all types of media service providers disclose ownership information to the public. Furthermore, the information required under points (a) to (d) of Article 6(1) EMFA is not fully disclosed.
- Several Member States had not yet established a media ownership database as required by Article 6(2) EMFA by the time of the MPM2026 data collection.
- The two indicators assessing the risk related to market power and opinion power, namely **Plurality of media providers** and **Plurality in digital markets**, are at the highest risk level, as it was in last year's assessment.
- In both cases, market dynamics have led to an increase in the economic indexes (Top 4) of concentration, whereas developments at EU and national level—despite introducing some rules to tackle media concentration and counter the dominance of digital platforms—are still

not effective in addressing concentration of media ownership and reducing asymmetries of power in digital markets.

- At the time of the assessment for this report, more than half of EU countries did not have in their national framework a ‘media plurality test’, i.e. specific rules and procedures to assess the impact of media market concentration on media pluralism and editorial independence.
- Concentration in the online advertising market is at a very high level, as in the past years. Despite the introduction of some pro-competition tools and other initiatives aimed at a fair allocation of economic resources, the situation on the ground did not improve and is, in fact, aggravated by lack of transparent and comparable audience measurement systems.
- The indicator on **Media viability** shows that concerns related to the media economy prevail. The number of employed journalists continues to decline—albeit at a slower pace than before—working conditions of freelancers remain poor, and the business models of news media are increasingly vulnerable to the digital transformation. News media, especially online, attempt innovations in business models, formats and processes, but this so far does not translate into any significant increase in revenue.
- **Editorial independence from commercial and owner influence** showed stagnation. Despite the EMFA’s emphasis on a clear separation of editorial and commercial activities, disguised advertising and business pressure over content creators remains an issue. In many countries, large media owners have interests in non-media sectors, which are rarely disclosed to audiences.
- In the **Market Plurality** area, only one country is in the medium-low risk band, while 11 countries are at medium-high risk, and 11 are at high risk. Four countries are in the very high-risk band: Cyprus, Romania, Hungary, and Malta.
- No country shows low risk in the **Market Plurality** area. Germany, the best performer, is close to the upper limit of the medium-low risk category. The low variance of results is due to certain economic indicators and trends being uniform across European media markets, which

EU Members - Market Plurality



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

is a consequence of the structural characteristics of the media industry, in particular, its tendency towards scale and concentration. These tendencies are reinforced by the global and cross-border nature of digital markets.

- Although the average risk score in the **Market Plurality** area has not changed since last year, the distribution of risk per country is slightly different. More countries have deteriorated in terms of economic risk than have improved.
- Malta passed from the high-risk to very high-risk band. This deterioration is to be attributed mainly to a lack of transparency of media ownership and increased commercial pressure on editorial independence. In the countries at very high-risk, all the indicators contribute to the worrisome result. For the year 2025, Cyprus was the worst performer in this area, with increasing risks deriving from both economic indices and the long-lasting impact of the loosening of regulatory intervention that began in 2023.
- Five countries, specifically France, Italy, Latvia, Luxembourg and Slovakia, shifted from medium-high to high-risk. The causes for this originate in the specific issues and factors of each national media system. However, these countries have one thing in common: a relevant increase in the **Transparency of media ownership** indicator. In France and Latvia, the overall increase in risk in the Market Plurality area is also due to the deteriorating economic sustainability of the media.
- On a positive note, three countries—Croatia, Finland and Spain—improved their Market Plurality score, shifting from high to medium-high-risk. Again, the indicator of **Transparency of media ownership** made the difference, in this case causing a reduction of the risk level; which in Croatia has also been caused by a modest improvement in **Media viability**.

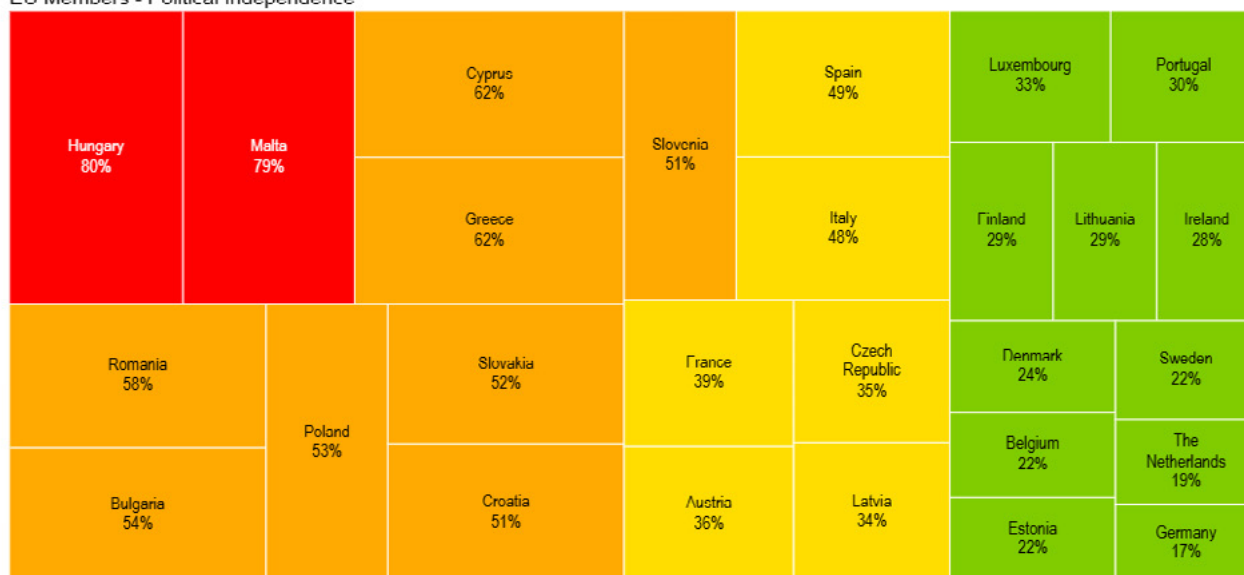


The **Political Independence** area assesses the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the state and of political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

- The **Political Independence** area scores in the medium-low band, with the same risk level of the previous implementation. However, three indicators out of five reveal risk increases. The indicator **Political independence of the media** moved from the medium-low, to the medium-high risk band. The indicator **Integrity of political information during elections** also deteriorated, passing from the low, to the medium-low band. The indicator **Independence of public service media** remains in the medium-low band, marking a slight deterioration.
- Political control over media outlets is increasing. In many Member States there is evidence of direct and indirect ownership control from active political players, enabled by a lack of effective protections. The power of media owners in influencing politics is also becoming increasingly evident, while geopolitical developments and potential risks in terms of security are paving the way for increased government oversight and veto powers on ownership changes.
- *External safeguards* is fragmented and often lacking detailed provisions for editorial independence. Some countries have recently reformed, or are in the process of reforming, their collective self-regulatory codes and structures. Some countries made state-funding conditional to the adoption of self-regulatory instruments.
- *Internal safeguards* is deficient. Well-functioning internal bodies, such as editorial committees or internal councils, are largely absent.
- Rules aimed at safeguarding the appointment/dismissal of editors-in-chief are largely absent across the countries analysed.

- PSM representation of political viewpoints in the electoral period continues to be assessed at relatively low levels of risk, in aggregate terms.
- This year, deterioration in the commercial realm provoked the passage of the sub-indicator *Private audiovisual media bias in the electoral period* to the medium-low risk band.
- Political advertising online continues to raise severe risks, especially in the platforms' environment. Implementation under the Transparency and Targeting of Political Advertising Regulation (TTPA) is lagging behind, in spite of some country-specific development. Third-country-sponsored political advertising is being detected in countries on the EU's external border.
- Major platforms implemented a ban on political advertising following the TTPA's full applicability. Several Member States reported issues with the effectiveness of the ban.
- Evidence emerged of the use of fake/inauthentic influencer accounts and (pseudo-) organic, covert forms of political advertising.
- Implementation under Article 25 EMFA is lagging behind, although in several countries a National Regulatory Authority has been designated to address state advertising allocation. While some public bodies have proactively started to disclose their expenditures (e.g., in Germany), the situation still proves highly concerning.
- Almost half of the countries continue to report relevant procedural problems and notable cases of political influence over appointments and dismissals of public service media's top management. Financial arrangements, likewise, remain vulnerable to political intervention. Cases are reported of reforms that may actually increase politicisation, going in the opposite direction vis-à-vis the higher standards set under EMFA Art.5.

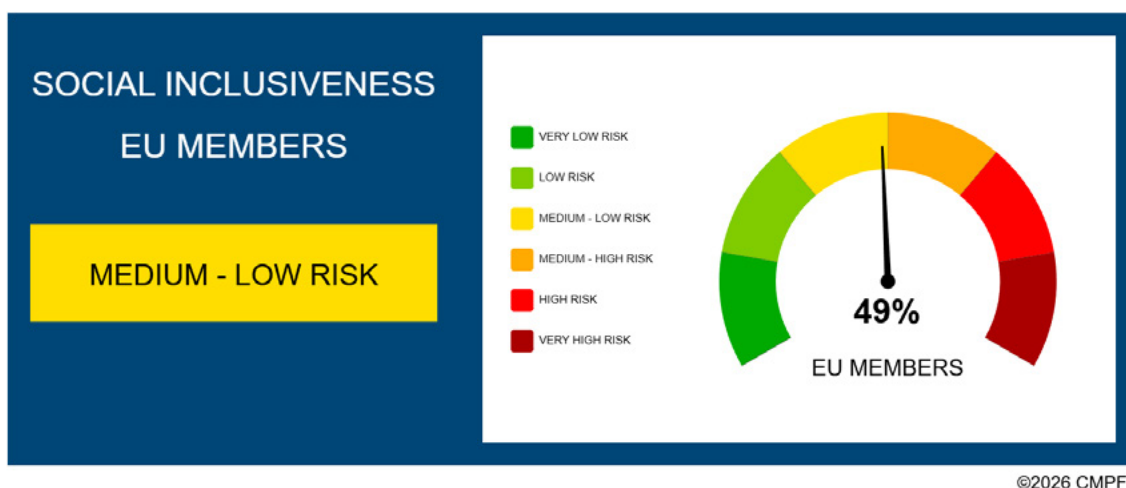
EU Members - Political Independence



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

- More than half of the EU Member States score between medium-low and high-risk bands. Two countries are assessed at a high-risk (Hungary, Malta), eight at a medium-high risk (Greece, Cyprus, Romania, Bulgaria, Poland, Slovakia, Slovenia, and Croatia), and six in the medium-low band (Spain, Italy, France, Austria, The Czech Republic, and Latvia). Only 11 Member States score in the low-risk band (Luxembourg, Portugal, Finland, Lithuania, Ireland, Denmark, Estonia, Sweden, Belgium, The Netherlands, and Germany).
- Some countries moved from one risk band to another, compared to the previous implementation of the report. Germany moved from the very low- to the low-risk band. Austria moved from the low- to the medium-low band. Slovakia moved from the medium-low to the medium-high band.
- Higher levels of risk continue to be detected in Eastern European countries, where mechanisms of control—i.e. ownership control and influence exerted through State advertising—are strongly interconnected.



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

- **Social Inclusiveness** remains at the highest end of the medium-low risk band. The median, however, is within the medium-high risk band, reflecting that the situation remains problematic in most countries. Nevertheless, none of the EU Member States scored at the extremes, that is within the very low or very high-risk band. This absence of extremes reflects on the one hand, the difficulty to reach a very low risk situation, given the intrinsic nature of Social Inclusiveness that aims at providing media access and representation to the most marginalised fringes of society. On the other hand, the absence of very high-risk scoring countries reflects the fact that all the countries studied are at least making limited efforts to ensure a minimal inclusivity of their media services.
- Over the past years, the vast majority of EU Member States have made some visible efforts to increase media accessibility for people with disabilities and to meet the requirements imposed by the Accessibility Directive and the Audiovisual Media Service Directive (AVMSD).
- While most EU Member States have legal frameworks and reporting mechanisms in place to combat hate speech, these are frequently inadequate in practice, and the fight against hate speech is often fragmented.
- While public service media typically address the critical information needs of their national population across most countries, the outlook for commercial media is more problematic, especially regarding the sustainability of local and regional providers.
- In terms of gender equality, the **Representation of women** remains the most significant risk factor in all the EU Member States. The persistence of high risk associated with the representation of women in the media is often linked to the absence of monitoring evaluation and learning mechanisms.

- Although media literacy policies are in place in most EU Member States and media literacy is often included in mandatory curriculums, these efforts are not necessarily visible in media literacy skills in practice. Besides, adequate financing of media literacy is often a weak point that limits the impact of initiatives taken.
- This is the first time that any country has scored within the very-low risk band in terms of Social Inclusiveness in the MPM. Sweden, which scored 16% in this area, benefits from a generally stable and well-functioning framework to guarantee diversity in the media, with no major structural changes compared to previous years.
- At the other extreme, Cyprus is the poorest performing country in terms of Social Inclusiveness. According to Christophorou & Karides (2026, p.40), ‘...the overall picture is stagnant to deteriorating and the matters that have long required closer scrutiny still need to be addressed’.
- Portugal moved from the high-risk band to the medium-high risk band. Some significant steps were taken to strengthen the fight against hate speech, with the new COOPERHATE EU-funded project through the CERV programme (2025-2027).
- Greece, unsurprisingly, reached the high-risk band. According to Papadopoulou & Angelou (2026, p.36), ‘...vulnerable and underrepresented groups continue to face obstacles in access, visibility, participation, and fair representation across the media system’.
- Romania moved to the medium-high risk category due to the significant extension of requirements that broadcasters must meet to guarantee media accessibility for people with hearing and visual impairment.
- The risk has significantly decreased in France. Methodological changes that consider the role of public service media to cover the critical information needs of local populations have contributed to reduce the risk level given the extensive territorial coverage of PSM in the country.
- Latvia’s risk score has significantly decreased due to the adoption by PSM of new editorial guidelines to avoid gender stereotyping in the media.
- Germany joins the low-risk band but, according to Kalbhenn (2026, p.38), ‘...this formal success should be considered alongside the challenges of the digital sphere since German state media authorities reported over 2,000 violations related to hate speech and illegal content on Very Large Online Platforms (VLOPs) to the EU Commission.’

EU Members - Social Inclusiveness

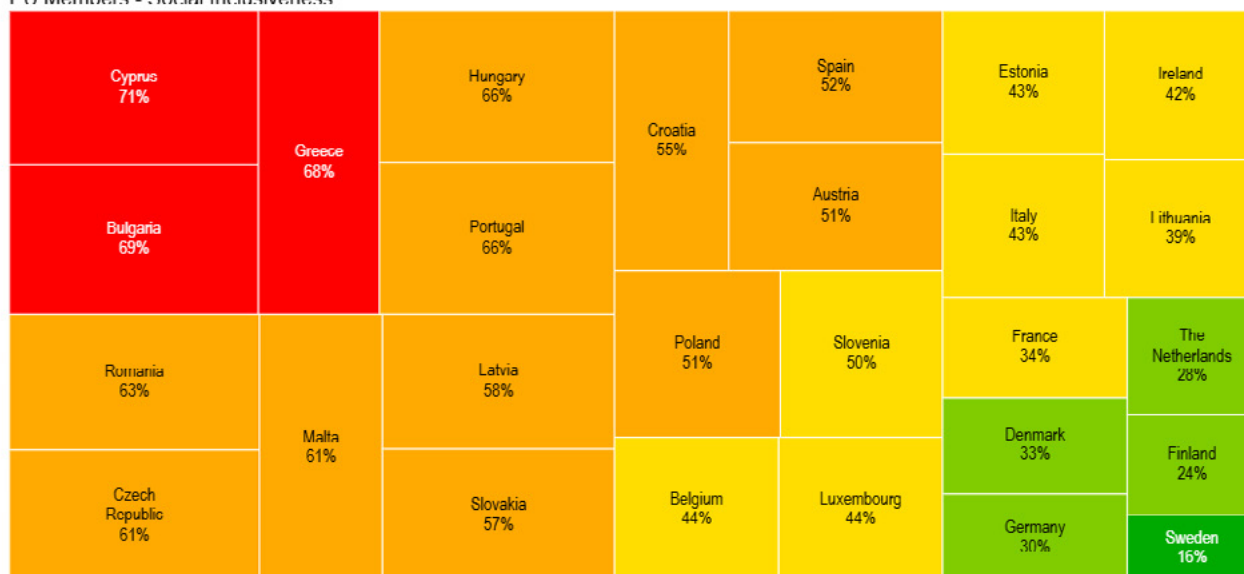


Figure 1.h. Social Inclusiveness area - Treemap ranking of the EU-27

Chapter 2

Fundamental Protection

2.1. In-depth results

The Fundamental Protection area considers the necessary preconditions for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression; the right to seek, receive and impart reliable and accurate information, including the right to access information and the protection of information integrity; favorable conditions for the free and independent conduct of journalistic work; the presence of independent and effective national regulatory authorities.

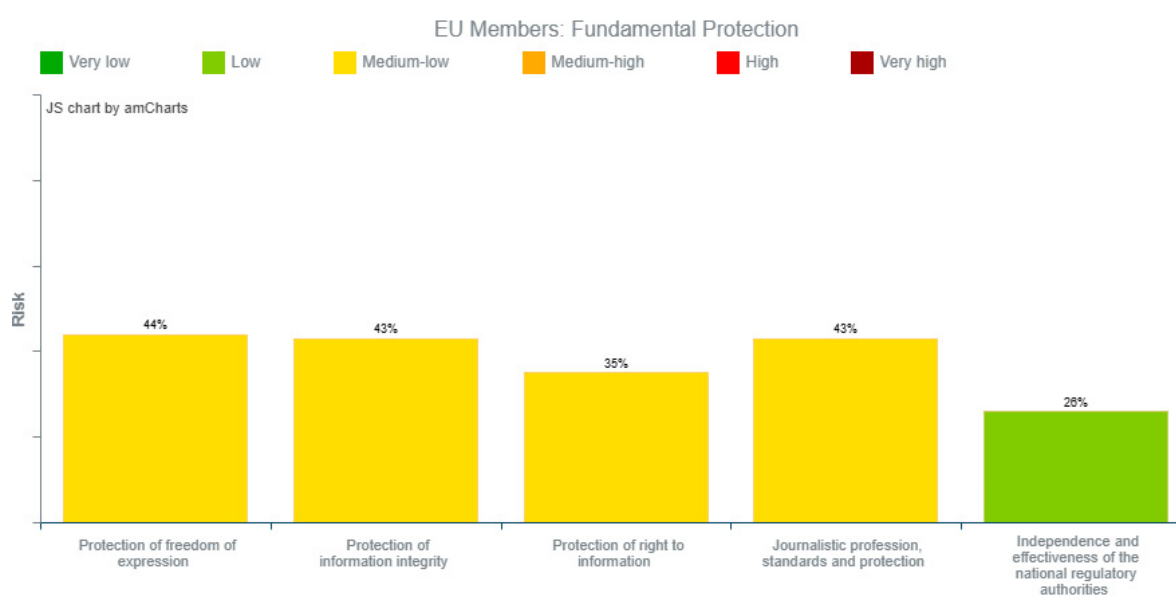


Figure 2.a. Fundamental Protection area. Averages per indicator

PROTECTION OF FREEDOM OF EXPRESSION MEDIUM - LOW RISK

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

The main international standards for freedom of expression have been recognised in the legal frameworks of all EU countries, but the respect of freedom of expression in practice varies. Some of the main issues highlighted in the previous MPM reports remain unsolved, namely the fact that defamation remains a criminal offence in many countries, the worrying practice of systematic recourse to SLAPPs and a lack of effective anti-SLAPP regulation.

Defamation is still criminalised, providing prison sentences as well, in 20 EU countries, and civil

lawsuits implying high costs for the defendants are common. Many defamation charges against journalists fall under the characteristic of SLAPPs, namely vexatious lawsuits against public participation.

The risk of SLAPPs is scored by MPM researchers as high in 11 EU countries (Bulgaria, Croatia, France, Greece, Hungary, Italy, Malta, Poland, Slovakia, Slovenia, the Czech Republic). The EU Anti-SLAPP Directive 2024/1069 was enacted on 11 April 2024, and the transposition deadline was 7 May 2026. The Anti-SLAPP directive has, so far, been transposed in Cyprus, Finland, France, Latvia, Lithuania, Malta, Slovenia and Sweden. As highlighted in the focus below, draft bills transposing the Directive are under discussion in several other EU countries. It would be highly desirable that this transposition includes domestic and criminal cases too, considering that the Directive only focuses on cross-border civil lawsuits, while most SLAPPs are domestic and might involve criminal charges.

In addition, restrictions on freedom of speech and assembly were observed in relation with major current geo-political issues such as the Russian full-scale invasion of Ukraine, the mass massacre of Palestinian civilians and journalists in Gaza, the climate crisis, and migration. This was the case, for example, in Germany, where the Council of Europe’s Commissioner for Human Rights raised concerns about restrictions on protest expression in regarding Gaza¹ and approximately 4,900 criminal proceedings against climate activists were reported between July 2024 and June 2025 (Kalbhenn, 2026). In Italy, the CIVICUS Monitor 2025 downgraded Italy’s civic space classification to “obstructed,” signalling that the rights to free expression, peaceful assembly, and association have been subject to systematic restrictions and intimidation (e.g., through surveillance). The downgrade also responded to the Italian government’s enactment of so-called “*security decrees*” (Vigevani et al., 2026).

In some countries, like Bulgaria and Hungary, laws

that are inspired by those used to prosecute foreign-agents are jeopardising the civil society sector that is cooperating or receiving funds from non-national sources (Spasov, Ognyanova & Daskalova, 2026; Bleyer-Simon et al., 2026). In Croatia, repeated obstructions of cultural events and festivals took place, particularly those involving the Serbian minority or critical interpretations of the 1990s war (Bilić, 2026).

PROTECTION OF FREEDOM INTEGRITY

MEDIUM - LOW RISK

The Protection of information integrity indicator assesses the respect of freedom of expression online by platforms, the respect of freedom of expression online by public authorities, and the protection against disinformation and foreign information manipulation and interference (FIMI).

The indicator on the **Protection of information integrity** remained medium-low risk in 2025. Problems were mainly reported in relation to online platform content moderation (see Focus 2.2.2) and measures to tackle disinformation and foreign information manipulation and interference (FIMI). In general, the legal framework asks for the respect of net neutrality and public authorities require Internet Service Providers (ISPs) to manage network traffic with respect to freedom of expression and the right to access information—the only outliers are Hungary, where the government ordered the blocking of Ukrainian news media websites without proper justification (Bleyer-Simon et al., 2026) and Romania, where the experts reported a lack of data and accountability in this regard (Toma et al., 2026). National strategies to tackle disinformation or FIMI exist, but their coordination between key institutions is still limited. There are 10 countries that have done worryingly little to address the threat of dis-

¹ Council of Europe, Letter to Federal Minister of the Interior Germany by the Commissioner for Human Rights Michael O’Flaherty: <https://rm.coe.int/letter-to-federal-minister-of-the-interior-germanyby-michael-o-flaher/1680b64870>

information (Bulgaria, the Czech Republic, Greece, Hungary, Malta, Portugal, Romania, Slovakia, Slovenia, Spain), while actions to tackle FIMI are missing in Austria, Bulgaria, Hungary, Malta, Slovenia and Portugal. In Slovakia, the change in government in 2023 has led to personnel changes in ministries that undermined past efforts to create a coordinated response to disinformation. Since these changes, no improvement has been registered and ‘...some government officials have increasingly prioritised communication through alternative online platforms and social media personalities rather than mainstream media outlets, a development that has raised concerns among observers about the evolving information environment’ (Urbániková, 2026:15). In Hungary, the Orbán government has used the threat of foreign interference as a pretence to propose restrictions on the funding of independent media and civil society (Bleyer-Simon, et al., 2026). All countries have fact-checking organisations and at least some degree of research into disinformation. However, their sustainability is often questioned, as they tend to be too dependent on EU-funding (among other things, through the European Digital Media Observatory). In Germany, fact-checkers have encountered pressure from abroad, as ‘...the research center CORRECTIV was labeled an “undesirable organization” by Russian authorities’ (Kalbhenn, 2026:14).

PROTECTION OF RIGHT TO INFORMATION MEDIUM - LOW RISK

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

The indicator on the **Protection of right to information** scores a medium-low risk in the MPM2026. Most countries are in the very low and low risk bands. Those in the very low risk band are

Denmark, Estonia, Finland, Germany, Latvia and Sweden, while those scoring low risk are Belgium, Croatia, Lithuania, Luxembourg, Slovenia and the Netherlands. Of these, Belgium and Luxembourg show a risk increase compared with the results of MPM2026. In Belgium, the increase is explained by a report published by the Federal Institute for Human Rights² on the Belgian whistleblower law, concluding that the system remains complex, both for whistleblowers and for authorities (Kuczerawy & Wauters, 2026:15). In Luxembourg, the risk increase is due to the absence of a whistleblower activity report from the Ministry of Justice in 2025.

Slovakia showed a steep risk increase, moving from the low risk to the medium-high risk band this year. This was triggered by an attempt by the ruling coalition to abolish the Office for the Protection of Whistleblowers. This attempt was subsequently blocked by the Constitutional Court, and the government ultimately decided to repeal the legislation after the European Commission froze a payment from Slovakia’s Recovery and Resilience Plan due to concerns about the reform (Urbániková, 2026:15).

The worst performing countries within this indicator are Hungary and Malta, both of which sit in the very high-risk band. Malta, however, saw its risk level increase from high to very high, while Hungary remained at very high risk. The deterioration in Malta is due to repeated FOI request denials, including one filed by the *Times of Malta* to the prime minister’s cabinet requesting the publication of ministers’ asset declarations in 2025. This prompted the government to formally propose, in 2026, the abolition of the submission of ministers’ asset declarations and the removal of obligations for MPs to declare properties solely owned by their spouses (Mallia et al., 2026:18).

² The Federal Institute for Human Rights is an independent institution set up by the Belgian Federal Parliament.

JOURNALISTIC PROFESSION, STANDARDS AND PROTECTION

MEDIUM - LOW RISK

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

The highest risks detected consider journalists' digital safety, followed by the problematic working conditions of journalists, the risks to their physical safety and the impunity for attacks against journalists.

Journalists working on sensitive topics are subject to online harassment (hate speech, doxing, spoofing, hacking attacks, and so on) and illegitimate surveillance (on surveillance and the implementation of art. 4 EMFA, see Focus 2.2.3). The use of deepfake videos of journalists aimed at discrediting them or using their public image to defraud people is on the rise. In Belgium there are many examples of this trend, such as the video of a supposed interview with *VRT NWS* journalist Goedele Devroy

where Prime Minister Bart De Wever recommends a fictitious government project that would quickly benefit citizens financially (Kuczerawy & Wauters, 2026). In Finland, scammers impersonated PSM *Yle* journalists on social media and via email (Palmer & Bleyer-Simon, 2026). Gendered online harassment is another significant trend. Impunity is particularly high for online crimes, where the source of the threat is often more difficult to trace. In Germany, a legislative process for enacting a law against digital violence (*Gesetz gegen digitale Gewalt*) has been initiated but is currently on hold (Kalbhenn, 2026).

Physical attacks on journalists are on the rise and are mainly related to reporting on public protests,³ as well as environmental issues, war-related topics (especially Gaza and Ukraine), and corruption.⁴ No killing of journalists took place in 2025 in the countries under analysis for the MPM; however, it is worth signalling that in 2025 many media professionals were killed in the exercise of their profession, such as in Ukraine and Palestine⁵.

Platforms dedicated to monitoring violence against journalists are being established throughout the EU, building on best practices such as the Dutch *PersVeilig*.⁶ A platform for reporting threats was initiated by the Portuguese Journalists' Union.⁷ Also, initiatives offering pro bono legal support to jour-

³ Attacks on demonstrations were among the key topics at the Broadcasting Forum 2025 in Austria.

⁴ In Italy, for example, the association Ossigeno per l'Informazione recorded a 78% increase in threats against journalists in the first six months of 2025, compared to the same period in 2024 (Vigevani, Canzian & Cecili, 2026). In Germany, a total of 98 incidents were recorded in 2025 by Mapping Media Freedom, representing the highest number since systematic monitoring began in 2015. For example, two journalists from the investigative outlet *Recherche Nord* were severely threatened by participants in a funeral march for Siegfried Borchardt, a prominent figure in the far-right neo-Nazi movement. A freelance journalist reporting for the collective *Democratia Berlin* was physically attacked and obstructed while covering a pro-Palestinian demonstration in Berlin. The study "Local Journalism Under Pressure" (BDZV/ECPMF, 2025) emphasises that local journalists, in particular, are increasingly exposed to attacks.

⁵ According to Reporters Without Borders, since October 2023, the Israeli army has killed nearly 220 journalists (RSF (2025). *2025, a deadly year for journalists: this is where hate and impunity lead*. <https://rsf.org/en/2025-deadly-year-journalists-where-hate-and-impunity-lead>); the Committee to Protect Journalists counted that 262 media workers have been killed across Gaza, Yemen, Lebanon, Israel, and Iran since October 2023 (CPJ (2026), *Journalist casualties in the Israel-Gaza war*. <https://cpj.org/2023/10/journalist-casualties-in-the-israel-gaza-war/>). According to Reporters Without Borders, three journalists were killed in 2025 targeted by Russian FPV drones. 16 media workers have been killed while carrying out their work since 2022 (RSF (2026). *Reporting under Russian fire: more than 175 journalists victims of abuse in Ukraine in the past four years*. <https://rsf.org/en/175-journalists-victims-abuse-ukraine>).

⁶ These platforms allow analysing data detailing some aspects of threats (subject, perpetrator, context): for example, for 2025 *PersVeilig* reports that many street confrontations occurred during routine reporting, and verbal harassment of photographers was notably frequent.

⁷ Sindicato dos Jornalistas (2025, Dec. 4). *Sindicato dos Jornalistas cria canal para denúncias de pressões e ameaças*. <https://jornalistas.eu/sindicato-dos-jornalistas-cria-canal-para-denuncias-de-pressoes-e-ameacas/>

nalists are key.⁸ Some countries, such as Latvia, Luxembourg and Portugal, have launched national plans for journalists' safety in 2025⁹.

The police have been identified as a perpetrator of intimidatory acts against journalists in Belgium, Cyprus, France, Germany, Greece and Spain, among other countries. Precautionary arrests of journalists took place in 2025 in France, Germany, the Netherlands and Poland, mainly in the context of environmental and pro-Palestine demonstrations. A particularly relevant case of criminal conviction is related to the protection of classified information: in July 2025, Finland's Helsinki Court of Appeal upheld the conviction of two *Helsingin Sanomat* journalists for revealing state secrets over their reporting on the country's military intelligence services. Prosecutors had demanded prison sentences for the journalists.¹⁰

Verbal attacks and smear campaigns against journalists are on the rise, often involving political figures.¹¹ Of particular concern were the numerous death threats received by journalists in 2025, across the EU, including the use of explosive devices (against Yannis Pretenteris in Greece and Sigfrido Ranucci in Italy¹²). A novel trend, traceable in MPM2026 are attacks against fact-checking organisations such as

Faktograf in Croatia and Re:Check in Latvia (Bilić, 2026; Skulte & Rožukalne, 2026).

The working conditions of journalists, especially local journalists and freelancers, remain poor throughout Europe (Verza et al., 2024) and in some countries there is a freeze on or lack of collective labour agreements (e.g. in Italy and Greece). Large media houses and PSMs are also cutting jobs. For example, *Al Jazeera Balkans* ceased operations after 14 years.¹³ Protests for better working conditions in PSM took place in Bulgaria (Spasov, Ognyanova & Daskalova, 2026).

The use of AI in journalism poses further threats for newsroom staffing. In Belgium, for example, the magazine *Elle* published articles under the name of fictional journalists: more than half of the online content was proved to be AI-generated (Wauters & Kuczerawy, 2026). Due to these labour issues, a decreasing number of young people are joining the profession. Economic instability jeopardises the quality of reporting, further increasing journalists' vulnerability to external pressures and negatively impacting journalists' mental health.¹⁴

Women and LGBTQ+ journalists are particularly vulnerable to this strain due to structural factors, in-

8 For example, *Pressclub Concordia's* "Rechtsdienst Journalismus" (Legal Service Journalism) in Austria.

9 See more initiatives at Council of Europe, *Repository of National Action plans for the safety of journalists*, <https://www.coe.int/en/web/freedom-expression/repository-of-national-action-plans-for-the-safety-of-journalists>

10 International Press Institute (2025, Jul. 2). *Finland: Appeal court verdict on Helsingin Sanomat state secrets case sends a chilling message*.

<https://ipi.media/finland-appeal-court-verdict-on-helsingin-sanomat-state-secrets-case-sends-a-chilling-message/>

11 In Croatia, for example, Prime Minister Andrej Plenković called out the media as the 'axis of evil', waging a 'hybrid war'. In Slovakia, investigative reporters revealed widespread use of paid political advertisements on Meta platforms to attack journalists and CSOs in Slovakia. Eighty-five percent of the ads were sponsored directly by government politicians or the ruling Smer party. In Spain, the association APM reports increasing threats against journalists covering parliamentary affairs, and the far-right party Vox launched multiple online harassment campaigns against female journalists (Suau et al., 2026).

12 Centre for Media Pluralism and Media Freedom (2025, Oct. 17). *In solidarity with Sigfrido Ranucci. A reflection on safety of journalists in Europe*.

<https://cmpf.eu.eu/in-solidarity-with-sigfrido-ranucci-a-reflection-on-safety-of-journalists-in-europe/>

13 Media Freedom Rapid Response (2025, Jul. 17). *SafeJournalists and MFRR: Closure of Al Jazeera Balkans is a Major Blow to Media Freedom and Pluralism in the Region*. <https://www.mfrr.eu/safejournalists-and-mfrr-closure-of-al-jazeera-balkans-is-a-major-blow-to-media-freedom-and-pluralism-in-the-region/>

14 In Spain, 70% of the journalists surveyed for the 2025 APM (Madrid Press Association) report, refer to deteriorating mental health—partly due to job insecurity. The rate is higher in the case of women (Suau Martinez et al., 2026). In Austria, in December 2025, 1,022 journalists were registered as unemployed. This represents an increase of 6.9% compared to last year. One third of journalists are concerned about both their mental and physical well-being (Seethaler, Beaufort & Strobl, 2026). In Poland, journalists report burnouts due to financial issues, workload and over-stimulation, due also to increasing AI news-making (Badowski, quoted in Klimkiewicz, 2026).

cluding workplace culture and societal attitudes.¹⁵ However, systematic data and monitoring on the impact of this on these more vulnerable groups are missing in most European countries.

INDEPENDENCE AND EFFECTIVENESS OF THE NATIONAL REGULATORY AUTHORITIES

LOW RISK

The Independence and effectiveness of National Regulatory Authorities covers both media authorities and authorities designated as Digital Services Coordinators (DSCs) under the Digital Services Act (DSA). It focuses on their competencies and accountabili-

ty, their independence from political influences, and the adequacy of their budget as well as technical and human resources.

At the EU level the overall risk remains low, due to legal frameworks in most EU Member States that provide for procedures designed to shield authorities from political appointments and influences—such rules are in place to prevent conflicts of interests. However, significant variation persists among Member States. High-risk scores for this indicator are found in Greece and Hungary, and medium-low-risk scores in Slovenia, Cyprus, Malta, Slovakia, Poland, Bulgaria, Estonia and Romania. The greatest representation of medium and high-risk countries (11) is related to independence from political influences of national authorities.

Art. 7 EMFA – Independence of the national regulatory authorities

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

- **An adequate budget, as well as adequate technical and human resources (Art. 7(3) EMFA).**

This criterion is designed to guarantee the operational autonomy of the NRAs. Accordingly, the establishment of stable and independent funding streams is essential. Also, considering the multi-fold increasing tasks assigned to NRAs, a sufficient number of staff members should be guaranteed. This doesn't appear to be the case for example, in Croatia (27 employees), or in Luxembourg (15).

In some countries, the NRA budget is strictly bound to the government budget, and is therefore, dependent on the related public budget's decisions and (eventual) austerity measures. This is the case, for example, in Estonia (Jõesaar, 2026).

When the role of the national media authority and DSC are not concentrated under the same authority, discrepancies between the two NRAs might emerge. In Portugal, for example, there is a striking difference of budget between the DSC (ANACOM, which in 2025 had a projected budget of €137,450,873, and the media authority (ERC), whose budget for 2024 was €7,220,000).

- **Independence from political and economic pressures (Art. 7(2) EMFA).** While the MPM shows a significant variation in the political independence of NRAs, EMFA implementation would require higher standards of independence, in line with Art. 30 of the revised AVMSD. Particular concerns in this regard can be found in Hungary, Greece and Slovakia.

¹⁵ In Spain, high-profile incidents involved organised online “mass reporting” and sexist intimidation by political actors, such as Vox and former MPs (Suau Martínez et al., 2026).

In Slovakia, for example, the risk score for this indicator rose from very-low in MPM2026 to medium-low in MPM2026. Concerns for the independence of the Slovak media authority, which has also been appointed as DSC, increased in 2025 as the parliamentary majority appointed six new members to the nine-member Council, several of whom have direct political or institutional ties to governing parties. Additional concerns emerged following the dismissal of the head of the regulator’s office in early 2026, paired with the proposal by the ruling Slovak National Party to concentrate key decision-making powers in a chair elected by parliament (Urbániková, 2026).

With regard to Greece, on 15 June 2025, the European Court of Human Rights requested official clarification from the Greek government concerning the legality and procedural validity of the appointments to both the National Council for Radio and Television and the Hellenic Authority for Communication Security and Privacy. The Athens Bar Association has described these appointments as legally and institutionally contentious, raising concerns about the independence of regulatory authorities.¹ Additionally, on 19 February 2025, ESIEA (the union for Athen’s daily newspapers) criticized the ESR’s decision to impose a fine on the television station *MEGA* for its reporting on Grigoris Dimitriadis—the Greek prime minister’s nephew—who has been linked to the Predator surveillance scandal and has initiated multiple SLAPP lawsuits against journalists.² Appointment systems in which parliament selects the leadership of national regulatory authorities (NRAs)—such as board members, chairs, or heads—tend to be institutionally less exposed to political influence than models controlled directly by governments. Nevertheless, additional guarantees are necessary to preserve independence. These may include requiring qualified parliamentary majorities for appointments, establishing comparable protections against arbitrary dismissal, staggering board renewals, setting fixed terms of office, limiting reappointments, and ensuring merit-based selection procedures with clear eligibility criteria. Equally important are conflict-of-interest and incompatibility rules for leadership and staff, alongside broader ethical safeguards, including mandatory “cooling-off” periods, to reduce risks of political or industry capture.

1 Goulas (2025, Jul. 15). *The Strasbourg Court requests explanations regarding the appointments to the National Council for Radio and Television (NCRTV/ESR) and the Hellenic Authority for Communication Security and Privacy (ADAE)*. <https://daily.nb.org/nomothesia-nomologia/nomologia/to-dikastirio-tou-strasvourgou-zita-exigiseis-gia-tous-diorismous-se-esr-kai-adae/>

2 ESIEA. *There are strong concerns regarding the reasoning behind the decision of the ESR*. <https://www.esiea.gr/entonos-provlimatismos-gia-to-skepti/?print=pdf>

2.2. Three focuses on Fundamental Protection

2.2.1. Focus 1 - Countering abusive lawsuits: who sues journalists, why, and what can be done in the year of the anti-SLAPP Directive transposition

The term SLAPP—Strategic Lawsuit Against Public Participation—was coined by professors George W. Pring and Penelope Canan in their book *SLAPPs: Getting Sued for Speaking Out* (1996). The term generally refers to a lawsuit filed by powerful subjects (e.g. a corporation, a public official, a high-profile business person) against non-government individuals or organisations who express a critical position on a substantive issue of some political interest or social significance.¹⁶

16 Verza S. (2018, Jun. 27). *SLAPPs’ 5 W’s: a background of the Strategic Lawsuits Against Public Participation*. <https://www.rcmediafreedom.eu/Tools/Legal-Resources/SLAPPs-5-W-s-a-background-of-the-Strategic-Lawsuits-Against-Public-Participation>

While the large majority of SLAPPs are based on national defamation laws,¹⁷ the data confirms the rising use of alternative legal vehicles, such as data protection rules. Intellectual property is also one of the causes for SLAPPs, and it could be interesting for future research to debate the categorisation of copyright claims online. A relevant case took place in June 2025, the cross-border journalism outlet *Investigate Europe* reported that it had been targeted by at least 50 bogus copyright claims filed with Google—apparently aimed at removing articles from its investigation into Europe’s betting industry from search engine results via Google’s infringement procedure.¹⁸ Several articles were temporarily removed from search engine listings. While the original report remains online, outlets affected include Malta’s *Amphora Media*, Poland’s *Frontstory*, *Reporters United* in Greece, and *Delfi* in Estonia.

Most of the vexatious lawsuits against the media are brought against individual journalists, followed by media organisations and activists, and are triggered by investigations into corruption, the govern-

ment and environmental issues (CASE, 2026:20, 24). SLAPPs are often private lawsuits, taking into account, however, that oftentimes the plaintiff is a public official or politician (CASE, 2026:20, 22-23). As Benazzo and others point out (2025), SLAPPs can be considered as a strategy of media capture in the context of gradual autocratization processes. In this analysis, media capture is understood as “a situation in which governments or vested interest networked with politics control the media” (Schiffrin 2018:1032) and autocratization is a process where there is a gradual erosion of key pillars of the accountability mechanisms of democracy, while procedural pillars (such as elections) are formally kept in place (Benazzo et al., 2025: 3).

According to MPM2026, a high-risk score related to the number and nature of SLAPPs against journalists is present in Bulgaria, Croatia, Czechia, France, Greece, Hungary, Italy, Malta, Poland, Slovakia and Slovenia. Examples of SLAPPs in these countries can be found in the respective MPM country reports. Positive acts of solidarity are worth high-

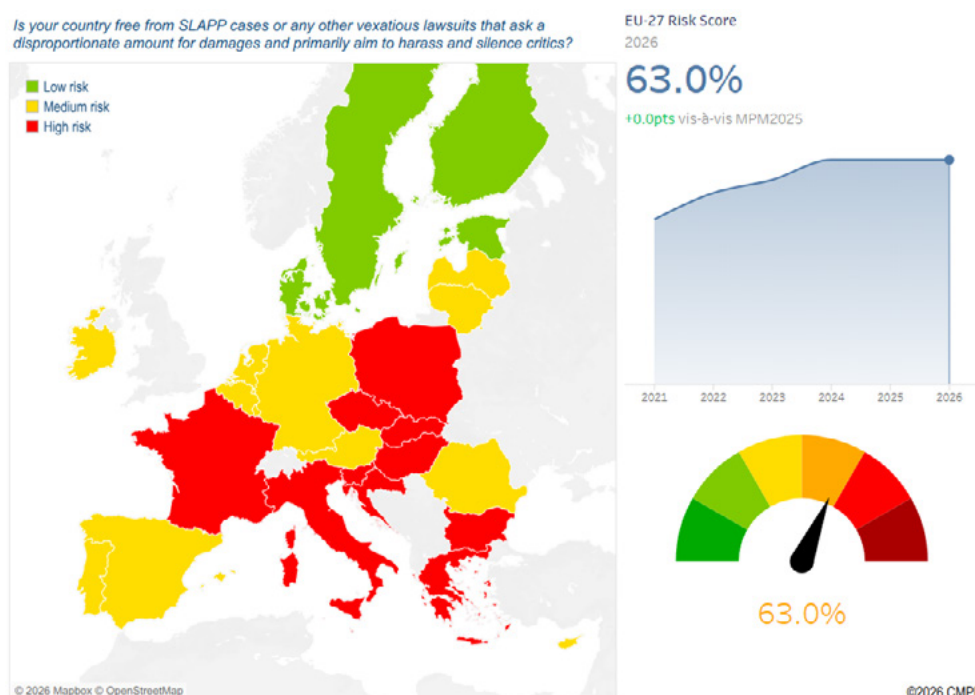


Figure 2.b. Presence of SLAPPs in each EU country. Variable-level risks (var. 10)

17 According to the MPM data, defamation is still criminalised in 20 EU countries.

18 Peigné M. (2026, Jun. 5). *Frivolous Google copyright claims ‘censor’*. *Investigate Europe gambling exposé*, Investigate Europe. <https://www.investigate-europe.eu/posts/shady-bets-google-copyright-claims-censor-investigate-europe-gambling-investigation-soft2bet>

lighting, such as that involving convicted journalist Boris Mitov and *Mediapool* in Bulgaria, who were “SLAPPed” in a defamation case filed by Judge Svetlin Mihaylov. The journalistic organisation AEJ-Bulgaria launched a fundraising campaign to support Mitov and *Mediapool*, and in less than 24 hours it had raised enough funds to cover the amount they were convicted to pay.¹⁹ Pro-bono legal defence, support by journalistic organizations, and by the legal aid departments of media companies are key for resisting SLAPP attacks. Finally, social support- by the general public, by audiences- is also key in defending journalism and preventing the “chilling effect” of SLAPPs (Benazzo et al., 2025: 8-9, 13).

Among the positive outcomes in SLAPP cases in 2025, here are two examples:

- On 28 May 2025, the Attorney General of Luxembourg took the unprecedented decision to publicly support *Reporter.lu* journalist Véronique Poujol in a defamation and slander case brought by the managing director of the property company *Qubiq* (Kies & Lukasik, 2026).
- In Hungary there was a favourable court decision for *Forbes*. The outlet was sued under the GDPR by the owners of the Hell energy drink (Urban, Polyak and Bleyer-Simon, 2026).

The EU Anti-SLAPP Directive 2024/1069 was enacted on 11 April 2024, following years of advocacy and pressure from media lawyers, activists,

civil society organisations, and journalistic organisations, among others. The transposition deadline was 7 May 2026. The 2024 EU Anti-SLAPP Directive focuses on cross-border civil lawsuits, which however only account for 8,5% of the SLAPP cases across Europe (CASE, 2026). Criticism of the Directive has been raised regarding its limited procedural safeguards (e.g. early dismissals are available only in manifestly unfounded proceedings). It is therefore desirable that Member States transpose the Directive with a wider scope of application, especially when related to domestic SLAPP cases, and that they also take into account the Council of Europe’s approach in Recommendation CM/Rec(2024)2 ‘on countering the use of strategic lawsuits against public participation (SLAPPs)’.

The transposition deadline was 7 May 2026. The Anti-SLAPP Directive has, so far, been transposed in Cyprus, Finland, France, Latvia, Lithuania, Malta, Slovenia and Sweden.²⁰

Specifically, it was transposed:

- In Cyprus, on 20 March 2026.²¹ The transposition applies only to civil, cross-border lawsuits.
- In France, on 5 May 2026, through Decree No. 2026-337.²² Civil society organisations describe the transposition as “minimalist,” noting that it does not apply to criminal proceedings, in particular defamation, which remain the primary vehicle for SLAPPs in France²³.

19 AEJ. (2025d): AEJ. (2025r). Подкрепа за Медиапул и Борис Митов: 421 души дариха надежда за смелата журналистика. AEJ – България, 1 август [Страницата не е открита | AEJ-България](#)

20 It is important to note that, for the sake of the MPM2026 calculation of risks, which assess the situation in 2025, the 2026 transpositions have not been taken into account.

21 Law n. 5079, 20 March 2026, [Ο Περί Προστασίας των Προσώπων που Προβαίνουν σε Ενέργειες Συμμετοχής του Κοινού από Προδήλωσ Αβάσιμες Αγωγές ή Καταχρηστικές Δικαστικές Διαδικασίες Νόμος του 2026.](#)

22 Décret n° 2026-337 du 30 avril 2026 relatif aux procédures engagées contre des personnes en raison de leur participation au débat public et portant transposition de la directive (UE) 2024/1069 du Parlement européen et du Conseil du 11 avril 2024 sur la protection des personnes qui participent au débat public contre les demandes en justice manifestement infondées ou les procédures judiciaires abusives (« poursuites stratégiques altérant le débat public »): <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000054026906>

23 Procédures-bâillons : une transposition sans ambition ni débat parlementaire, 6 May 2026, <https://transparency-france.org/2026/05/06/procedures-baillons-une-transposition-sans-ambition-ni-debat-parlementaire/> . See also the French Union of Independent Online Press Publishers (12 May 2026): <https://www.spiil.org/s/position/proc-dures-b-illons-le-spiil-d-plore-une-transposition-trop-limit-e-MCXGLFCEEJG5GGVP6464JCYIG52U>

- In Finland, the ‘Act on the protection of persons participating in public debate against cross-border abusive proceedings’ was adopted with Law 334/2026²⁴. The scope of the new Act is narrow, as it applies only to civil and commercial matters that have cross-border implications (Palmer & Bleyer-Simon, 2026). Defamation is still criminalised in Finland.
- In Latvia, on 5 May 2026 through the enactment of a dedicated anti-SLAPP law (84.1/2026)²⁵ and amendments to the Civil Procedure Law (84.3/2026).²⁶ The framework will be applicable in all civil cases, regardless of whether the case has cross-border implications. Furthermore, the draft law aims to protect any natural or legal person acting in the public interest (Skulte & Rožukalne, 2026).
- In Lithuania, where an amendment to the Code of Civil Procedure (Art. 95(1)) was adopted.²⁷ This defined the procedure for applying anti-SLAPP measures. Accordingly, if a journalist believes that the plaintiff has dishonestly filed an unfounded claim to harm the journalist’s professional activity related to the protection of the public interest, they have the right to file a complaint with the court. If the court agrees, it shall oblige the plaintiff to file responses to the defendant’s application, substantiating their claim and providing evidence. Anti-SLAPP legisla-
- tion has already been confirmed in practice in 2025 when representatives of the leading portal Delfi requested that the court apply Article 95(1) of the Code of Civil Procedure and leave the claim temporarily unexamined. The court granted Delfi’s request²⁸. In parallel, however, defamation remains a criminal offense.
- In Malta, the EU’s Anti-SLAPP directive was officially transposed, by means of Legal Notice 177 of 2024, which introduces the Strategic Lawsuits Against Public Participation (SLAPP) Order.²⁹ It introduces measures such as security for costs by the plaintiffs, early dismissal of unfounded claims, penalties for abusive litigation up to €10,000, and legal aid for the defence. However, the transposition only focuses on cross-border lawsuits and establishes a low cap for penalties. In January 2025, the government shot down all the opposition’s proposals to amend Malta’s anti-SLAPP legislation.³⁰
- In Slovenia, on 28 January 2026.³¹ The Slovene Association of Journalists considers specific shortcomings that will need to be addressed, including the limited scope of the bill, the inadequate recording of SLAPP enforcement procedures, and the provision of information and support.³²
- In Sweden, on 12 March 2026,³³ amending

24 Laki julkiseen keskusteluun osallistuvien henkilöiden suojelemisesta rajat ylittäviltä häirintäkanteilta / Lag om skydd mot gränsöverskridande rättegångsmissbruk för personer som deltar i den offentliga debatten (334/2026) 8.5.2026 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=NIM:202602749>

25 Sabiedrības interesēs iesaistīto personu aizsardzības likums. 5 May 2026, https://eur-lex.europa.eu/legal-content/LV/TXT/PDF/?uri=CELEX:72024L1069LVA_202602634

26 Grozījumi Civilprocesa likumā, 5 May 2026, https://eur-lex.europa.eu/legal-content/LV/TXT/PDF/?uri=CELEX:72024L1069LVA_202602636

27 Lietuvos Respublikos civilinio proceso kodekso 95, 95-1, 142 straipsnių pakeitimo ir Kodekso papildymo priedu įstatymas Nr. XV-700 https://eur-lex.europa.eu/legal-content/LT/TXT/PDF/?uri=CELEX:72024L1069LTU_202600831

28 Delfi.lt. (2025, Apr. 7). *Teismas priėmė visai žurnalistų bendruomenei svarbią nutartį: prieš „Delfi“ taikytas strateginis ieškinyš*, <https://www.delfi.lt/news/daily/lithuania/teismas-prieme-visai-zurnalistubendruomenei-svarbia-nutarti-pries-delfi-taikytas-strateginis-ieskinyš-120099280>

29 Strategic Lawsuits Against Public Participation (SLAPP) Order, Legal Notice 177 of 2024: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:72024L1069MLT_202403444

30 Times of Malta (2025, Jan. 29). *Government shoots down PN amendments to anti-SLAPP law*. <https://timesofmalta.com/article/government-shoots-pn-amendments-antislapplaw.1104429>

31 Zakon o zaščitnih ukrepih zoper strateške tožbe za onemogočanje javnega udejstvovanja (ZZUSTOJU) (2026, Jan. 28) <https://pisrs.si/pregledPredpisa?sop=2026-01-0345>

32 Komentar predloga zakona o zaščitnih ukrepih zoper SLAPP tožbe, (2026, Nov. 6) <https://novinar.com/novica/15915/>

33 Förordning om ändring i rättsinformatiönsförordningen (1999: 175)

the Legal Information Regulation and with a dedicated Act (“Act on the Protection of Participation in Public Debate in Disputes with Cross-Border Implications”).³⁴ The Swedish transposition will apply only to civil and commercial proceedings with cross-border implications related to public participation. However, several important procedural safeguards were introduced: courts may dismiss manifestly unfounded claims at an early stage through an accelerated procedure; courts may require claimants to bear the full costs of proceedings and, where appropriate, award compensation for damages suffered by the defendant.

Draft bills of transposition are being discussed:

- In Belgium, where in December 2025 the Council of Ministers approved the proposal for transposing the Directive;³⁵ the Council of State must now give its advice. The bill also applies to domestic SLAPPs and to both civil and criminal proceedings. It also provides the possibility for courts to dismiss a manifestly unfounded claim at an early stage of the proceeding. In this case, the plaintiff can be ordered to pay damages, including the full costs incurred by the defendant for legal representation (Wauters and Kuczerawy, 2025).
- In Croatia, where representatives of the Ministry of Justice announced a draft law on the protection of persons engaged in public participation, introducing safeguards such as cost deposits for
- plaintiffs and sanctions for abusive litigation (Bilić, 2026).
- In Estonia, where the Ministry of Justice and the Ministry of Digital Affairs have prepared a draft law to amend the Code of Civil Procedure and the Law of Obligations Act³⁶. The Estonian Journalists’ Association has been designated as the local contact point to support and advise journalists.
- In Germany, where the Federal Cabinet approved a draft law transposing the Directive, but the implementation is limited to cross-border cases. According to the government, this approach reflects the view held by many legal practitioners and professional associations that the current legal framework already provides sufficient tools to address abusive litigation.³⁷ A national NO-SLAPP contact point was also established in May 2024, and it received 48 inquiries in 2025. Most cases concerned purely domestic disputes rather than cross-border litigation.³⁸
- In Ireland, where the Defamation (Amendment) Act enacted in February 2026³⁹ clarifies how courts should interpret the “publication in the public interest” defence introduced in the 2009 Defamation Act and introduces a new “serious harm” requirement (particularly relevant for corporate plaintiffs) designed to filter out trivial claims early. It provides early dismissal mechanisms, and payment of costs and damages by plaintiffs if the case is found to be a SLAPP (Flynn, 2026). However, the SLAPP-re-

https://eur-lex.europa.eu/legal-content/SV/TXT/PDF/?uri=CELEX:72024L1069SWE_202602622

34 Lag om skydd för deltagande i den offentliga debatten vid tvister med gränsöverskridande följder: https://eur-lex.europa.eu/legal-content/SV/TXT/PDF/?uri=CELEX:72024L1069SWE_202602621

35 Proposition de loi portant des mesures visant à protéger des personnes qui participent au débat public contre les demandes en justice manifestement infondées ou les procédures judiciaires abusives (“poursuites stratégiques altérant le débat public” ou “SLAPP/poursuites-bâillons”) (2025, Feb. 18) <https://www.dekamer.be/FLWB/PDF/56/0728/56K0728001.pdf>

36 Tsiviilkohtumenetluse seadustiku ja võlaõigusseaduse muutmise seadus (vaigistushagi eest kaitsmise direktiivi ülevõtmine) 865 SE <https://www.riigikogu.ee/tegevus/eelnoud/eelnou/0a75bac8-f28b-48e9-918d-d4c5010f9b46/tsiviilkohtumenetluse-seadustiku-ja-volaõigusseaduse-muutmise-seadus-vaigistushagi-eest-kaitsmise-direktiivi-ulevotmine/>

37 Deutscher Richterbund: Stellungnahme Nr. 8/2025. <https://www.drj.de/positionen/stellungnahmen/stellungnahme/news/8>; Bundesrechtsanwaltskammer: Stellungnahme Nr. 30/2025. https://www.brak.de/fileadmin/05_zur_rechtspolitik/stellungnahmen-pdf/stellungnahmendeutschland/2025/stellungnahme-der-BR-ÄK-2025-30.pdf

38 No-SLAPP-Anlaufstelle: Jahresrückblick 2025 <https://www.noslapp.de/neuigkeiten/die-no-slapp-anlaufstelle-2025-ein-jahresrueckblick>

39 Defamation (Amendment) Act. (2026, Feb. 19), <https://www.irishstatutebook.ie/eli/2026/act/2/enacted/en/html>

lated parts of the Act are still not in force. According to the government's website:

Part 7 of the Act, which contains provisions in relation to abusive proceedings against public participation (SLAPPs), will be commenced to align with the provisions of the Strategic Lawsuits Against Public Participation Bill, the General Scheme of which was published on 11 February 2026. This Bill will provide for safeguards against SLAPPs in respect of all other civil and commercial proceedings outside of defamation proceedings. It will also complete the transposition of the EU Anti-SLAPP Directive.⁴⁰

- In Italy, where the Italian Chamber of Deputies gave approval to the delegation to transpose the EU anti-SLAPP Directive into national law on 11 August 2025⁴¹. This was limited to cases with cross-border implications, does not contain robust early-dismissal mechanisms and fails to introduce genuinely dissuasive sanctions against abusive claimants. Moreover, it does not provide structured support mechanisms⁴² (Vigevani, Canzian & Cecili, 2026).
- In Luxembourg, a draft bill was approved by the Council of Government on 9 January 2026, introducing safeguards like early dismissal of manifestly unfounded claims against public participation. The bill applies to all civil and commercial disputes, including national ones. It has been forwarded to the Chamber of Deputies for review.
- In Poland, legislative works are pending, but do not include amendments to criminal law (in particular Article 212 criminalising defamation). The draft law also covers domestic proceedings, introduces a definition of public debate, enables NGOs to join the proceedings on the defendant's side and present information relevant to the case, provides early dismissals for abusive claims and reimbursement of the full costs of legal representation to the defendant, and lastly, provides a publication mechanism of proceedings deemed to be SLAPPs.⁴³
- In Romania, where the Ministry of Justice finalised a draft transposition bill in June 2025, submitted to parliament on 11 February 2026 and currently under review in the Senate.⁴⁴ The bill covers domestic cases and provides procedural safeguards against manifestly unfounded claims.⁴⁵
- In Slovakia, where the Ministry of Justice presented an amendment to the Civil Procedure Code that responds to and transposes the Anti-SLAPP Directive. This amendment goes beyond the scope of the Directive, as it does not specify that it would be limited only to court proceedings with a cross-border element. Since December 2025, an interdepartmental consultation process has been under way⁴⁶ (Urbanikova, 2026).
- In Spain, where the transposition of the EU Anti-SLAPP Directive into national legislation would take place within a broader set of legal

40 Minister Jim O'Callaghan signs Defamation (Amendment) Act (Commencement) Order 2026, (2026, Feb. 25) <https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/press-releases/minister-jim-ocallaghan-signs-defamation-amendment-act-commencement-order-2026>

41 Delega al Governo per il recepimento delle direttive europee e l'attuazione di altri atti dell'Unione europea – Legge di delegazione europea 2025 (2-25, Aug. 11). <https://www.camera.it/leg19/126?leg=19&idDocumento=2574>

42 CILD (Italian Coalition on Civil Rights) (2025, Nov. 28). *Policy brief – SLAPP in Italia: impatto, lacune normative e proposte*. <https://cild.eu/blog/2025/11/28/policybriefslapp/>

43 Fusiecki, J. (2025, Nov. 23). *Regulacje anty-SLAPP gotowe. Wykorzystywany art. 212 zostaje w Kodeksie karnym*. https://www.press.pl/tresc/90405,regulacje-anty-slapp-gotowe_wykorzystywany-art_212-zostaje-w-kodeksie-karnym

44 PL-x No. 58/2026 Draft Law on protection against manifestly unfounded claims or abusive legal proceedings directed against persons involved in public mobilisation activities https://www.senat.ro/legis/lista.aspx?nr_cls=L276&an_cls=2026#ListaDocumente

45 Ganea, L., Ilie, D., Martin, R.. (Mar. 2026). *SLAPPs and Freedom of Expression in Romania*, Friedrich Naumann Foundation for Freedom Romania and Moldova, https://activewatch.ro/documents/303/SLAPPs_and_FoE_in_Romania_AW_Report_2026.pdf

46 Legislatívny proces, LP/2025/667, <https://www.slov-lex.sk/elegislativa/legislativne-procesy/SK/LP/2025/667>

reforms meant to improve the quality of democracy in Spain, known as the ‘Plan de Acción por la Democracia’ (Suau et al., 2026).

- In The Netherlands, where in April 2025 the state secretary for legal protection submitted a proposal of legislation to the Tweede Kamer⁴⁷.

It would be desirable that this transposition included domestic and criminal cases too, considering that the Directive only focuses on cross-border civil lawsuits, while most SLAPPs are domestic and might involve criminal charges.

2.2.2. Focus 2 - Content moderation on online platforms. Opaque processes despite EU-wide transparency requirements

Risks manifesting on social media and search engines are often tackled through EU-level policies and regulation, which plays a significant impact when it comes to related variables in the **Protection of information integrity** indicator. Content moderation by platforms is a pivotal example.

The variable asking whether online platforms moderate content with respect to freedom of expression scores medium risk in most EU Member States. This is because the EU’s Digital Services Act sets rules on the mitigation of systemic risks that apply across all these countries –providing a similar degree of protection but also showing similar shortcomings. Most countries report the same problems: a lack of meaningful data and insufficient justification for moderations, while often referring to some

higher-profile cases of removed content that were reported in the news—which they see as representing only the tip of the iceberg. The Estonian team, for example, reported that ‘platform transparency remains difficult for users to access and assess, as relevant information is often fragmented, unclear, or overly technical.’ They add: ‘This [practice] limits meaningful public scrutiny and may weaken trust in platforms’ responses to systemic risks’ (Jõesaar, 2026:12).

The transparency reports of online platforms (focusing on the first half of 2025⁴⁸) provide aggregate data on the moderation efforts taken by digital services that are classified by the DSA as very large online platforms (VLOPs) or very large online search engines (VLOSEs) with more than 45 million monthly users in the EU. The numbers often lack sufficient context to assess whether decisions were taken in a manner that respects users’ freedom of expression.

The reports show that countries with less widely spoken languages are underrepresented when it comes to human content moderators. X and LinkedIn, for example, have not engaged content moderators for more than a third of the countries of the EU. The Irish, Luxembourgish and Maltese languages are barely addressed by human content moderators of any platform, and minority languages (even if they are widely spoken worldwide, such as Russian and Arabic) are not covered by the reports. The lack of humans evaluating content moderation decisions in these languages is especially problematic, because it shows that decisions are taken by arti-

⁴⁷ Bescherming van journalisten en mensenrechtenorganisaties tegen strategische rechtszaken tegen publieke participatie (2025, Apr. 15)

<https://www.rijksoverheid.nl/actueel/nieuws/2025/04/15/bescherming-van-journalisten-en-mensenrechtenorganisaties-tegen-strategische-rechtszaken-tegen-publieke-participatie>

⁴⁸ Meta: Regulation (EU) 2022/2065 Digital Services Act Transparency Report for Facebook 29 August 2025, Meta: Regulation (EU) 2022/2065 Digital Services Act Transparency Report for Instagram 29 August 2025, Microsoft: LinkedIn Digital Services Act Transparency Report August 2025. <https://content.linkedin.com/content/dam/help/tns/en/August-2025-Digital-Services-Act-Transparency-Report.pdf>, X DSA Transparency Report - April 2025. <https://transparency.x.com/dsa-transparency-report-2025-april.html>, Google EU Digital Services Act (EU DSA) Biannual VLOSE/VLOP Transparency Report https://storage.googleapis.com/transparencyreport/report-downloads/pdf-report-27_2025-1-1_2025-6-30_en_v1.pdf, TikTok’s DSA Transparency Report - January - June 2025 https://sf16va.tiktokcdn.com/obj/edenva2/zayvwlyfjulyhwzuyh/ljhwZthlaukjlkulzlp/DSA_H1_2025/TikTok-DSATransparencyReport-January-June-2025.pdf

ficial intelligence, which may not be able to grasp the full context in which a post appears, thereby leading to potential over-blocking and a violation of freedom of expression.

The two Meta platforms, Instagram and Facebook, provide information on the so-called “automation overturn rate” in their transparency reports. According to these reports, the rate is on average, higher than ten percent in the EU, thus providing proof that AI-driven decision-making is prone to error. Only Lithuania, Slovenia and Sweden have reported a low-risk situation for content moderation, mainly because the experts did not register any signs of interference in users’ freedom of expression, and thus opted for the benefit of the doubt. Most country teams still consider social media platforms (many of them categorised as VLOPs under the DSA) to be significant in the spread of harmful content, such as disinformation. Despite the low-risk assessment for the variable on content moderation, it was highlighted in Lithuania that civil society remained critical of the perceived opaqueness of content removal and filtering on platforms (Jastramskis, 2026).

In Germany, the shortcomings of platform moderation prompted authorities to take steps towards complementary action. For example, state media authorities started to utilise AI tools of their own choice to proactively look for hate speech and extremist content. In addition,

‘...the Broadcasting Commission of the German States adopted key points for an amendment to the State Media Treaty, aiming for a concrete draft of the Digital Media State Treaty [... seeking] to expand the role of media authorities in platform supervision, specifically targeting algorithmic recommendation systems and AI-generated content. A key proposal involves ensuring the ‘findability’ of reliable content in search results and feeds intended to strengthen democratic discourse. (Kalbhenn, 2026:14, see also Rundfunkkommission, 2025).

Article 18 of the European Media Freedom Act gives special protections to media outlets publishing content on platforms if they self-declare as media service providers falling under regulation or self-regulation in Member States. Meta’s report on the year 2025⁴⁹ has thus far only mentioned four outlets that self-declared—all public service media (from Belgium, Finland, Germany and Italy). The platform has to publish data on content removals and appeals related to these outlets. According to the report, the most common reason for removals of news media content on Meta services was the attempt of outlets to pay to increase the reach of journalistic articles on current affairs (521 instances for these four outlets), which the platform considers to be political advertising, and therefore not allowed on its services. In 11 cases, the justification for removal was “adult nudity and sexual activity” – nine of these cases (and the one case of “adult sexual solicitation & sexually explicit language”) were appealed by the media outlets.

In addition to assessing content moderation actions initiated by platforms, the indicator on information integrity also looks at instances when state authorities request technology companies to take action on their platforms, with the aim of limiting the availability of harmful or illegal content. While most EU Member States refrained from making an excessive number of such requests, they barely informed citizens about them. The reporting on these enquiries was usually left to platforms themselves, who included authority requests in their DSA transparency reports. These were raising the same concerns about a lack of detail and context, as described above under platform reporting. The Dutch expert team wrote that ‘[T]here is still no clear and consistent overview of how often and on what grounds such requests are made. Earlier initiatives aimed at improving transparency have not led to a structural reporting system, which makes it difficult to fully assess the role of public authorities in this area’. (De Swert et al., 2026).

⁴⁹ Meta (Jan. 30, 2026). *European Media Freedom Act Annual Report*.

In some countries, the MPM country researchers shared concerns about (potential) overreach by authorities in content moderation. In Poland, it was pointed out that responsibilities are not clearly defined in situations in which too many state institutions can request content removal by platforms. This includes the Office of Electronic Communication, the National Broadcasting Council (KRRiT), and the Commissioner for Human Rights (Klimkiewicz, 2026:13-14). In Spain, the Preliminary Draft Bill for the Improvement of Democratic Governance in Digital Services and Media Regulation ‘has sparked significant debate by potentially empowering administrative bodies like the CNMC to issue content-removal orders directly’. Criticism included claims that

...by shifting this authority to a regulatory agency—rather than keeping it strictly within the courts as established by the 2022 Supreme Court ruling—the bill may bypass essential judicial safeguards. This move is seen as a risk to ‘due process,’ as administrative decisions lack the rigorous legal scrutiny and impartiality inherent in a courtroom setting (Suau Martínez et al. 2026:15).

In Romania, during the election campaigns of 2024 and 2025, the National Audiovisual Council, the Central Electoral Bureau and other authorities have taken “excessive measures” to tackle content appearing on online platforms, often targeting “regular citizens” whose posts should be protected by the right to freedom of expression (Toma et al., 2026:14).

It was also shown that some of the protections established by the DSA are not yet functioning properly: while it is not necessary to have out of court dispute resolution bodies in every country, there are still numerous languages that are not covered by the bodies established (European Commission, n.d.-a) – meaning that many citizens do not have access to out of court dispute resolution mechanisms if their complaints are related to posts written in their native language. Some Member States, such as Bulgaria,

Croatia and Spain have not yet awarded trusted flagger status to any organisation ‘for detecting potentially illegal content and alert online platforms’ (European Commission, n.d.-b). Content flagged by such organisations is supposed to be addressed by platforms with priority. In the case of France, concerns were raised about the potentially biased positions of some appointed flaggers (Ouakrat & Lupovici, 2026).

Out of court dispute resolution bodies were set up in some member countries, but it was mentioned that the platforms often did not take into consideration their requests. In Ireland, which is the place of establishment for most social media platforms in the EU, the organisation Appeals Centre Europe (ACE) offers out-of-court dispute resolution services in half a dozen languages. However, the country team described shortcomings related to their work:

ACE decisions are not legally binding on platforms and while the DSA requires platforms to engage with the dispute process in good faith, they retain the final decision about the content. In the introduction to its first transparency report ACE noted that co-operation with platforms had been “mixed”, suggesting that platforms were doing little to alert users to the existence of dispute settlement bodies like ACE. Furthermore, where users were able to access ACE and raise a dispute, ACE assert[s] that some platforms were not sharing the content needed to review disputes (Flynn, 2026:18).

While it was mentioned that most users are not likely to turn to the courts to seek remedy for a removed post or a blocked profile, in the Dutch case, it was highlighted that courts may nevertheless play an important role in defining how platforms may operate in Member States, ‘as illustrated by a 2025 ruling requiring Meta to make feeds that are not based on personalisation effectively usable’ (De Swert, 2026: 14).

2.2.3. Focus 3 - Surveillance in the

public interest. The regulation of the use of spyware in Europe

Intrusive surveillance software is designed to exploit vulnerabilities in other products with digital elements, enabling covert surveillance by monitoring, extracting, collecting or analysing data from such products in an indiscriminate manner (art. 2 (20) EMFA). In simple words, this software—also known as spyware—can be installed on any device (e.g. a phone) and collect any kind of information contained there or record any type of communication made through such a device. In some cases, there is no need for the device’s owner to click on any link for the software to be installed (“zero-click” technology).

On 18 July 2021, the French NGO Forbidden Stories published an investigation into the use of the Israeli surveillance company NSO’s hacking spyware, Pegasus, to spy on 180 journalists worldwide, including in France, Hungary and Spain.⁵⁰ This investigation triggered a debate on the use of intrusive surveillance technologies in the EU. The debate led to the enactment of an explicit prohibition of the use of spyware or other forms of breach of journalistic protection of sources, under art. 4 of the European Media Freedom Act.

Article 4 EMFA enshrines protection for journalistic sources and confidential communications in EU law. Member States are generally barred from compelling journalists or associated persons to reveal sources, detaining or sanctioning them, intercepting communications, or using surveillance technologies against them. Exceptions apply under certain conditions, including judicial authorisation, compliance with EU primary law and the Charter of Fundamental Rights, and a public interest justification.

Any surveillance measure must satisfy a case-by-case proportionality assessment, with less intrusive alternatives preferred whenever sufficient. Intru-

sive surveillance software (ISS) should, therefore, remain an *ultima ratio* measure, interpreted in line with EU fundamental rights and ECtHR/CJEU jurisprudence. Judges must verify, with periodical judicial review, both compliance with Article 4 conditions and proportionality in practice between the intrusion and the offence pursued. Derogations apply only to offences under Framework Decision 2002/584/JHA or other serious crimes punishable by at least five years’ imprisonment.

In most cases, however, civil society organisations and other relevant stakeholders have highlighted the vagueness of the exceptions to the prohibition of using spyware, often related to national security and the protection of classified information; allegedly, such expectations may basically neutralize the protection put in place by EMFA and the new national frameworks.

Article 4(5)(b)(i)EMFA permits the use of ISS when journalists—or persons who have a regular or professional relationship to them—are under investigation for offences listed in Framework Decision 2002/584/JHA, punishable in the Member State concerned by a custodial sentence or a detention order of a maximum period of at least three years. This creates risks for source protection, as journalists could be put under surveillance solely because their sources are suspected of listed crimes. Moreover, the notion of “serious crime” under Article 4(5)(b)(ii) of EMFA requires careful scrutiny. Over the past decade, the term has become central to EU internal security policy, yet scholars have repeatedly highlighted its conceptual vagueness, which undermines coherent policymaking and harmonisation. Research has shown that “serious crime” is identified through both legal criteria, such as sentencing thresholds, and empirical criteria, including the social harm and impact of offences (Paoli et al. 2016). The latter approach is particularly important because it links the seriousness of crime to the actual harm caused to society, as opposed to “perceived”-

⁵⁰ Rueckert, P. (2021, Jul. 18). *Pegasus: The new global weapon for silencing journalists*. <https://forbiddenstories.org/pegasus-the-new-global-weapon-for-silencing-journalists/>

crime seriousness (Visschers and Paoli 2025). This approach aligns with ECtHR and CJEU jurisprudence, including *Digital Rights Ireland Ltd* (C-293/12), which require strict scrutiny and proportionality whenever freedom of expression, privacy, and data protection are restricted (Malferrari 2025; Venice Commission 2024).

Article 4 of the EMFA requires prior authorisation by a judicial or independent authority before intrusive surveillance technologies may be used against media service providers or related persons, although urgent cases may permit ex post authorisation “without undue delay.” The Regulation also mandates periodic reviews to verify whether the conditions justifying surveillance remain fulfilled. These provisions, particularly ex post reviews, fall short of the standards established under Article 10 of the ECHR and ECtHR jurisprudence. In *Sergey Sorokin v. Russia* and *Big Brother Watch v. the United Kingdom* (2021), the ECtHR stressed the importance of prior judicial authorisation, independent oversight, and consideration of less intrusive alternatives before surveillance measures are deployed. Critics also question extending authorisation powers to independent administrative bodies, arguing that they lack the judiciary’s degree of independence (Bayer 2024). This concern reflects the ECtHR’s reasoning in *Sanoma v. the Netherlands* (2014), where authorisation by a public prosecutor was deemed incompatible with Article 10 of the ECHR.

EMFA does not specify time limits or modalities for spyware use, leaving regulation to Member States under EU law and CJEU oversight. National models may provide guidance,⁵¹ though spyware may require stricter safeguards than any other surveillance technology that has been regulated so far.

Finally, to guarantee the practical effectiveness of Article 4, the prohibition of unlawful state actions

should also apply to proxy actors, including quasi-autonomous non-governmental organisations (quangos) and private entities acting on behalf of public authorities. As a matter of fact, governments may circumvent formal restrictions by relying on intermediary organisations, including private “troll farms,” to conduct surveillance or disinformation activities indirectly. The recent Black Cube case in Slovenia, ahead of the March 2026 national elections, seems to be a fitting example.

Spyware are tools performing maximum invasiveness through minimum visibility, which recalls “black box” dynamics: a concept usually applied to algorithms, big data and machine learning tools, that seems to work for spyware as well given the “techno-fog” surrounding it (Di Salvo, 2024). The abuse of surveillance powers is taking place in democratic contexts, under security - related legislation, and this phenomenon is largely understudied (Papadopoulou, 2025:2). Practical cases of surveillance of journalists through the use of spyware technology are listed in Table 1.1 (Annexe 1). Particular attention should be paid to the Predatorgate case in Greece, the Graphite case in Italy, and the Pegasus case in France, Hungary, Poland and Spain; also, the presence of spyware producing companies in Bulgaria, Cyprus, Czechia and Malta must be signalled: as a matter of fact, the market of surveillance tools and the large number of companies involved is one of the crucial components of the commodification of this technology (Di Salvo, 2024). The opacity of the “black box” dynamics of spyware triggers serious “chilling effects” on journalists, fear and paranoia: one of the main forms of resistance to it appears to be unveiling such cases through journalistic investigation (Papadopoulou, 2025: 5), as it was the case in all of the known cases of surveillance on journalists through spyware listed in Table 1.1 (Annexe 2).

51 For example, the Italian Code of Criminal Procedure, art. 267 (2) provides that the prosecutor can dispose of wiretapping with a motivated order but that a judge should validate it within 48 hours. Also, the prosecutor should indicate the modality and timeframe for the wiretapping, which cannot be longer than 45 days unless specific concrete elements emerge (art. 267 (3)).

2.3 Recommendations for Fundamental Protection

The Fundamental Protection area of MPM2026 identified a number of important trends, including concerning developments and examples of good practice, that may help stakeholders involved in media policy and strategy uphold the fundamental rights to freedom of expression and media freedom. Journalists' working conditions—particularly regarding salaries and social security schemes—appear to be worsening. At the same time, major disruptive factors such as wars and climate change are having a significant impact on press freedom. Journalists reporting on these sensitive topics, as well as corruption and migration, are increasingly exposed to SLAPPs, physical intimidation (especially during demonstrations), and online attacks such as harassment, doxing, spoofing, and surveillance. These threats are particularly severe against women journalists, and impact on media workers' mental well-being.

Journalists may also have seen their content unjustly moderated online by platforms devoid of editorial responsibility or opaque algorithms. Risks are run by whistleblowers, even though the EU Whistleblowing Directive has finally been transposed in all the EU countries. The possibility for journalists and newsrooms to access public documents under FOIA laws is still not completely effective. The year 2025 was crucial for EU media policy. In this year the EMFA entered into force, while many EU countries started discussing its implementations as well as the transposition of the Anti-SLAPP Directive. All considered, the following section outlines a series of recommendations for diverse stakeholders in the media landscape

EU institutions should:

- Ensure the swift transposition of the EU Anti-SLAPP Directive in a manner that is fully aligned with the Council of Europe's approach

set out in Recommendation CM/Rec(2024)2.

- Ensure the timely implementation of the EMFA across Member States, in accordance with the case law of the ECtHR and the CJEU, with particular attention to Article 4 of EMFA, providing that governments cannot rely on vague national security claims to justify the surveillance of journalists or delegate such practices to private companies.
- Introduce stronger binding measures to protect journalists' working conditions, including the effective enforcement of the Minimum Wage Directive (2022/2041).

Member States should:

- Develop more structured mechanisms of cooperation and exchange of best practices regarding media policies, in the context of the EBMS and outside of it.
- Adopt or effectively enforce laws that protect journalists from attacks and harassment, with particular focus on preventing online threats and unlawful surveillance.
- Introduce labour legislation that guarantees journalists adequate minimum wages and access to social security protections.
- Transpose the EU Anti-SLAPP Directive in a way that also covers domestic SLAPPs and criminal law cases.
- Decriminalise defamation, including in cases involving public figures and institutions, and abolish imprisonment as a possible sanction.
- Ensure that National Regulatory Authorities (NRAs) — including media authorities and Digital Services Coordinators (DSCs) — remain independent and are provided with sufficient funding and staffing.
- Provide training for judges and law enforcement authorities on the rule of law and on the principles underpinning the Anti-SLAPP Di-

rective and the EMFA.

- Enforce national FOI legislation across institutions to ensure timely handling of requests, prevent unjustified denials, and eliminate the misuse of exemptions.
- Enhance compliance with whistleblower protection legislation through targeted awareness campaigns and robust safeguards for reporting persons.
- Introduce national strategies to tackle disinformation and FIMI, building on coordination and collaboration between multiple departments.

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

- Ensure their independence and uphold the rule of law, particularly regarding journalistic presence at demonstrations, precautionary arrests of journalists, and surveillance practices.
- Implement training programs focused on issues related to media freedom;
- Apply the DSA and EMFA impartially, with a clear focus on safeguarding the fundamental right to freedom of expression.

Newsrooms, journalistic organisations should:

- Promote and ensure fair working conditions and salaries, as well as comprehensive social security provisions for employees and members.
- Develop and implement psychological support systems for employees and members who face SLAPPs, harassment, or other professional threats.
- Establish funds or insurance schemes to cover the legal and personal costs incurred by journalists in SLAPP cases.

Very large online platforms should:

- Introduce targeted protections for journalists who are regularly subjected to online harass-

ment—such as hate speech, doxing, impersonation, and hacking attempts—and ensure they receive adequate safeguards.

- Provide more detailed reporting of content moderation actions in their reporting, explain in more detail the rationale of their moderation decisions (to affected parties and authorities) and provide disaggregated data focusing on specific policy violations.

Chapter 3

Market Plurality

3.1. In-depth results

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

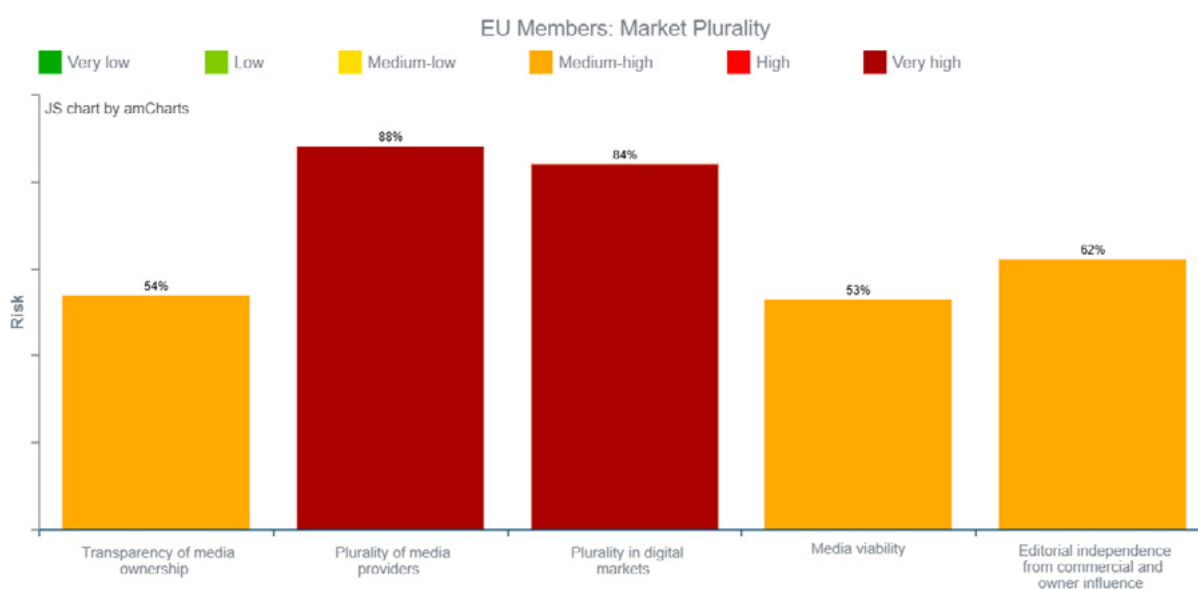


Figure 3.a. Market Plurality area. Averages per indicator

On average, **Market Plurality** is at high risk in EU countries, and the indicators that contribute most to this result are those related to ownership concentration of both the media providers and of the online intermediaries. **Plurality of media providers** and **Plurality in digital markets** are at very high risk. This result has remained unchanged since the implementation of the Media Pluralism Monitor, and depends mostly on socio-economic factors. Attempts to enforce competition and changes to the regulatory framework have not altered the outcome so far.

As in previous years, the other three indicators in this area are at medium-high risk. The **Transparency of media ownership** indicator is slightly higher than last year, showing that many EU countries are still far from operationalising the transparency obligations set out by the EMFA. The situation regarding **Media viability** has not improved. Ownership concentration and financing difficulties often lead to increased economic pressure on newsrooms, as reflected by the stable risk level of the **Editorial independence from commercial and owner influence** indicator.

TRANSPARENCY OF MEDIA OWNERSHIP (art.6(1) and 6(2) EMFA)

MEDIUM - HIGH RISK

This indicator assesses the risks arising from insufficient transparency of media ownership in the news media sector. It evaluates measures adopted at the national level to ensure the effective implementation of the EU legal requirements for disclosing media ownership details, including financial information. It further examines whether such disclosures are guaranteed in practice, in line with the EU legal framework.

Transparency of media ownership underwent changes in this edition of the MPM to reflect the full application of EMFA. The new variables composing the indicator in the MPM2026 translate the obligations set out in Article 6(1) and (2) EMFA. The indicator now contains eight variables equally split between legal and socio-political questions, which assess whether Member States have taken measures to ensure the effective application of the obligations established by Article 6(1) and (2) EMFA, and how these legal obligations are operating in practice at the national level.

Within this new context, the indicator on **Transparency of Media Ownership** scores a medium-high risk at the MPM2026. Estonia and Sweden are the sole countries in the very low risk band. Four countries are in the low risk band (Croatia, Germany, Lithuania and Portugal); six countries score a medium-low risk level (Finland, Greece, Poland, Slovenia, Slovakia and Spain); six score a medium-high risk level (Austria, Bulgaria, France, Ireland, Italy, Latvia); two countries score a high risk level (Denmark and Luxembourg); and seven countries score a very high risk level (Belgium, Cyprus, Hungary, Malta, Romania, the Czech Republic and the Netherlands). The very low and low risk results stem from the fact that these countries have adopted, or already had in place, laws requiring the disclosure of media ownership structures from all media service providers, including direct, indirect

and beneficial ownership, have mechanisms in place ensuring effective disclosure by media service providers, and generally make this data publicly available. Member States scoring in the medium-low, medium-high- and high-risk bands have frameworks that only partially align with the current EMFA requirements. However, some of them are currently in the process of adopting new legislation, or applying recently adopted legislation, amending their legal frameworks on media ownership transparency. Countries in the very high-risk band generally lack ownership transparency rules aligned with the new EMFA requirements and have not yet taken any action to align their legal frameworks, as is the case in Belgium, Cyprus, Hungary and the Netherlands. Others, though, are in the process of adopting new national rules — such as Malta and the Czech Republic — but still have frameworks in place that lag behind the newly established EU media ownership transparency framework.

PLURALITY OF MEDIA PROVIDERS

VERY HIGH RISK

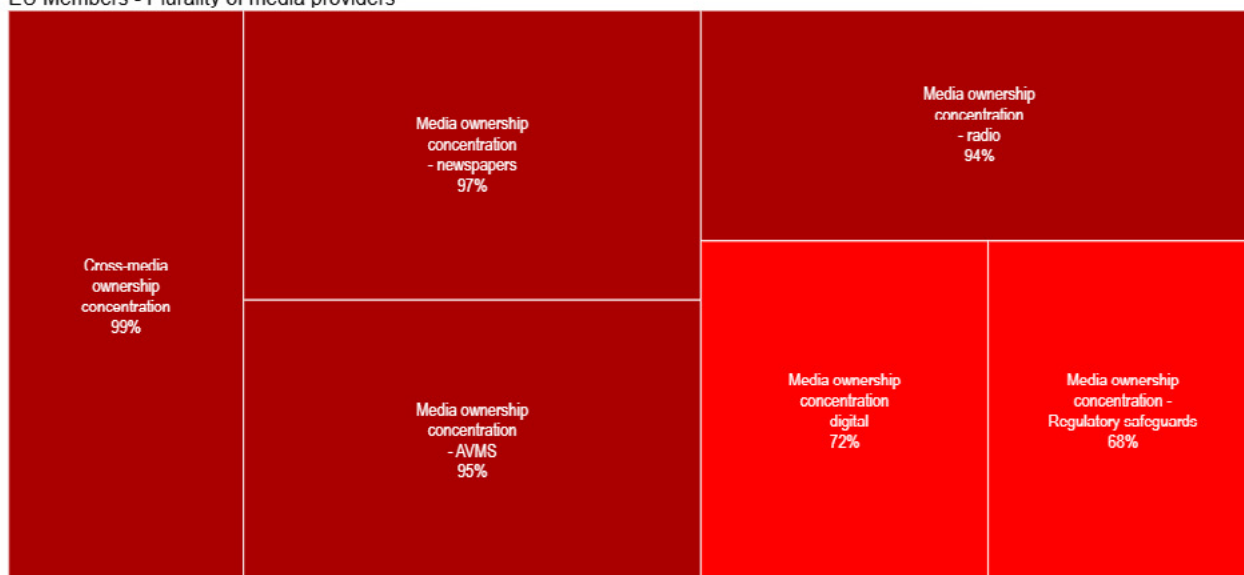
The indicator on Plurality of media providers assesses the threats to media pluralism that arise from concentration of media ownership. It contains a sub-indicator on the legal framework, to assess the existence and effectiveness of media-specific measures to prevent excess of market and opinion power; and 5 economic sub-indicators, using the Top4 index for each sector (AVMS, radio, newspaper, digital) and for the whole media market.

This indicator shows the highest risk level in the entire MPM, with no significant differences between EU countries. None of them are below the high-risk band. Twenty-one countries score very high risk, the remaining six score high risk, and they are: Austria, Finland, Greece, Italy, Portugal, and Slovakia. This homogeneous result can be explained by the economic dynamics that are common across

the European media industry. In fact, the legal sub-indicator on regulatory safeguards, albeit still in the high-risk band, is the sub-indicator that performs best in this area. It shows a wider range of results, with one third of the countries in the low or medium-low risk band.

Rossel and IPM, announced their merger (Wauters & Kuczerawy, 2026). In Germany, Media for Europe (MFE) finalised the acquisition of ProSiebenSat1. Before this operation, ProSiebenSat1 was the second-largest private audiovisual group in Europe (after RTL), and MFE the third largest. The Com-

EU Members - Plurality of media providers



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Figure 3.b. Plurality of media providers. Risk-level per sub-indicator

Note: Figure 3.b visualizes the results of MPM2026 for the sub-indicators on media ownership concentration, based on the Top4 index per sector and cross-media. A lack of market and audience data is evaluated as a risk, according to the MPM methodology.

The legal and economic sub-indicators show contrasting trends compared to last year: the former have improved, while the latter have worsened. On the one hand, reforms at a national level to comply with EMFA provisions on the assessment of media mergers reduced the level of risk in the legal realm. (see Focus 2). Conversely, economic data indicate increased levels of concentration in legacy media sectors, particularly newspapers and radio, as well as cross-media concentration.¹

Indeed, there have been several notable cases of media mergers and acquisitions in the assessment period. In Belgium, the two main actors in the newspaper sector in the French-speaking community, Groupe

mission on Concentration in the Media (KEK), cleared the acquisition. ‘The central reasoning for this decision was that the takeover does not fundamentally alter ProSiebenSat.1’s market position, nor does it objectively strengthen its existing influence on public opinion within the German media landscape’. (Kalbhenn, 2026, p. 23). In the Netherlands, the merger between RTL and DPG media (approved by the competition authority under conditions, see Focus 2), reduced the number of major media players in the country from four to three (one of which is the public broadcaster). (De Swert et al., 2026). In Italy, ‘during 2025, several highly significant ownership reorganisation processes were ini-

¹ It must be noted that the measurement of the economic variable is influenced by availability of primary data. Moreover, the sub-indicators for each media sector are weighted to calculate the average of the indicator according to different consumption habits. The change in data measuring consumption habits may also influence the final score. (See Methodology).

tiated, which were finalised between the end of the year (entry of LMDV Capital into “Il Giornale”) and the beginning of 2026 (including the transfer of the newspaper “La Stampa” to the SAE group and the sale of the GEDI group to the Greek group Antenna).’ (Vigevani et al., 2026, p. 6). Significantly, many of these operations have a cross-national dimension, reinforcing the arguments in favour of a pan-European perspective on media market plurality. (Parcu 2026)

PLURALITY IN DIGITAL MARKETS

VERY HIGH RISK

The indicator on Plurality in digital markets evaluates risks emerging from the market power of digital intermediaries to the news (very large online platforms, search engines, and - more recently - AI-based aggregators). It includes measures of concentration (based on the Top4 index in the advertising market and in the total online audience) and evaluates the factors that may enable a fair allocation of economic resources between media content providers and tech players.

The very high risk in this indicator derives from the oligopolistic structure of the digital markets, and by the assessment of their impact on the media environment. In this indicator, no country is below the high-risk band. Thirteen countries position themselves at high risk, and the other 14 at very high risk.

While the measurement of the previous indicator focuses on media content providers, the scope of this indicator includes the digital players that do not provide original information but that do have a crucial role in the distribution of and access to the news. Risks are assessed in two sub-indicators: *Online platforms concentration*, and *Fair allocation of economic resources*. As visualized in figure 3.c, the concentration of online platforms is at the highest possible risk level, almost without exception.

The very high-risk level for the *Online platforms concentration* sub-indicator is an obvious consequence of the dominance of only a few companies in the online advertising market. However, it must be noted that assessing the shares of the same players at the national level is not always possible based on the available data. Official measurements of concentration indexes for this market by regulators are



Figure 3.c. Plurality in digital markets. Risk level per sub-indicator

rare,² and in the MPM data collection this assessment is often based on estimates made by advertising agencies or researchers. When available, the data on online advertising markets in the EU countries confirm the worldwide tendency.³ In addition, the MPM also considers the audience concentration, which may better describe dominance in the attention markets.⁴ Nonetheless, comparable and reliable data on audiences is even more difficult to collect, signalling risks related to lack of transparency in the market.

The issue of audience measurement is also addressed in the sub-indicator on *Fair allocation of economic resources*, together with the state of the economic relationships between media, online platforms and AI companies. In this sub-indicator, legal frameworks and socio-economic factors are considered. These factors explain the greater variance across the Member States, with two countries at medium-low risk (France and Spain), and nine countries at medium-high risk (Austria, Belgium, Denmark, Finland, Germany, Italy, Portugal, the Czech Republic, and The Netherlands). Progress in these countries may derive from some form of digital taxation (Austria, France, Portugal and Spain), and/or from (self-)regulatory developments on audience measurement, and/or from the intervention of regulators and competition authorities to rebalance asymmetries of market power between media and platforms, and more recently between media and GenAI companies (see Focus 3).

MEDIA VIABILITY

MEDIUM - HIGH RISK

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

The indicator on **Media viability** remained medium-high risk and is unchanged from last year. The last available revenue trends show that ten countries saw a decrease in audiovisual media revenues (Austria, Cyprus, Greece, Finland, France, Ireland, Italy, Malta, Spain and Sweden). In some countries, the public service media saw cuts in its public funding. In Estonia, for example, ‘cuts to ERR’s funding raise concerns about the long-term viability of public service media and may weaken its capacity to fulfil its legal obligations in full’ (Jõesaar, 2026, p. 22).

The print newspaper market plateaued in four countries (Belgium, Estonia, the Netherlands and Poland), while the rest saw a decline. Radio performed better, with the overwhelming majority of countries experiencing growing or at least plateauing revenue for radios. For online native media, there was still a lack of data in many of the countries. In Spain, it was observed that the ‘increase in digital subscriptions’ did not lead to ‘a substantial improvement in revenue’ (Suau Martinez, 2026, p. 26). Aside from Cyprus and Romania, all countries reported efforts towards developing news

² Art. 24 EMFA includes Audience measurement in Section 5, “Transparent and fair allocation of economic resources”, and sets out the principles of transparency, impartiality, inclusiveness, proportionality, non-discrimination, comparability and verifiability. These principles are to be pursued through the means of self-regulation and co-regulation.

³ For example, in the annual report year 2025, the Italian Autorità per le garanzie nelle comunicazioni (AGCOM) the Top4 index for the online advertising market in Italy was 75,8% (https://www.agcom.it/sites/default/files/media/allegato/2025/RA%202025_APPENDICE%20STATISTICA_0.pdf see tav. 3.9).

⁴ Prat and Valletti 2022; Prat 2020; Ofcom 2022 and 2024.

sources of revenue. In a similar vein, only Cyprus, Romania and Slovenia saw no significant effort in their newsrooms to work on innovations in journalistic products or workflows. In the Netherlands, DPG Media started granting free subscriptions to students (until the age of 25) in an effort to ‘lower barriers to quality journalism’ and to increase demand in a section of the population that increasingly gets its news from social media (see De Swert et al., 2026).

The majority of countries reported a continued decline in the number of employed journalists, but exact numbers were often hard to find. In Malta, the bad working conditions and low salaries of journalists lead to a shortage of qualified professionals and ‘newsrooms struggle to find skilled individuals willing to work as journalists’ (Mallia et al., 2026, p. 31). Similarly, the working conditions of freelancers were seen as problematic, with improvements only reported in Denmark, Finland and Lithuania. Five countries reported having no favourable support scheme for private media (Bulgaria, Cyprus, the Czech Republic, Romania and Slovakia), but several others highlighted that the available subsidies are unable to provide a significant contribution to outlets’ sustainability. Hungary is the only country where none of the existing support schemes are made available to online media.

EDITORIAL INDEPENDENCE FROM COMMERCIAL AND OWNER INFLUENCE

MEDIUM - HIGH RISK

The indicator on Editorial independence from commercial and owner influence assesses risks to market plurality posed by business interests on the production of editorial content, both from commercial and owners’ influence. To assess this risk, it considers the existence of rules and regulatory safeguards about professional journalism as well as effective independence and autonomy of editorial decision/making.

Editorial independence from commercial and owner influence shows no change in its risk score,

remaining at medium-high risk. Only two countries (Germany and Luxembourg) reported strong enough social protections in cases of changes in editorial line or ownership, even though eight other countries reported having some sort of conscience clause for journalists. In France, the local team pointed out that such social protections of journalists only benefit the individuals, but they do not seem to prevent owners from interfering in the editorial line of newsrooms. Last year, for example, ‘the weekly Marianne experienced a wave of resignations, alongside a no-confidence motion against its new editor-in-chief, Ève Szeftel’ (Ouakrat & Lupovici, 2026, p. 23).

Disguised commercial practices still exist. Even though laws or self-regulation prohibit advertorials in every country of the EU, 17 Member States still did not see them as sufficiently effective. Nine countries saw commercial interference in journalistic work as a significant problem (Bulgaria, Croatia, Cyprus, Greece, Hungary, Lithuania, Romania, Slovakia, and Slovenia), while only four countries saw commercial interference as negligible (Denmark, Germany, Ireland and the Netherlands). In some cases, questionable commercial practices were seen as an outcome of structural weaknesses in a changing market. Croatia highlighted that ‘competition for limited advertising revenue often encourages practices that compromise professional standards (...) pushing outlets toward aggressive banner advertising, native advertising and click-driven content strategies’ (Bilić, 2026, p. 22). In Belgium, it was observed that some newsrooms experience commercial pressure through ‘corporate structures, synergy targets, and data driven publishing practices’ (Kuczerawy & Wauters, 2026, p. 26). It was often mentioned by country teams that local media are, in general, more vulnerable to pressure and less likely to abide by journalistic self-regulation. Owners of market-leading news media tend to have interests in other market sectors, thereby potentially compromising reporting. Only five countries (Croatia, Denmark, Finland, Sweden and the Netherlands) did not register such conflicts of interest.

EMFA Article 6(3)

In general, the ethical codes of journalists' associations provide for newsroom independence across the EU. However, there is significant difference between countries when it comes to the extent of newsrooms subscribing to self-regulation, and the respect of those codes among outlets formally subject to them. In the Netherlands, the Authority for Consumers and Markets (ACM) encouraged the strengthening of self-regulation when it approved the merger between DPG and RTL: 'DPG had to tighten the editorial statutes of all its news titles in order to strengthen their editorial independence'. (De Swert, 2026, p. 27). In 19 countries, the law stipulates that owners and management cannot arbitrarily interfere in the work of journalists, but only six of them saw this protection as effective. The disclosure of conflicts of interest, especially when they relate to owners, is not common practice.

Across the EU, some efforts were seen to strengthen newsroom independence in line with the EMFA. In the Czech Republic 'the newly adopted self-regulatory framework ("Desatero", or the "Ten Commandments"), agreed upon by representatives of Czech professional media organizations, journalistic associations, and public service media [...] calls on media service providers to establish internal rules safeguarding newsrooms from undue political and commercial influence' (Štetka et al., 2026, p. 21). In Spain, the draft law amending Law 13/2022 presented by the government in July 2025 considers 'conflicts of interest as a "serious offense", under the supervision of the National Commission on Markets and Competition (CNMC)' (Suau Martinez, 2026, p. 27). In Slovenia, the Mass Media Act requires publishers to,

disclose any actual or potential conflicts of interest that could influence the provision of information to the public (ZMed-1, art. 23). Such disclosures must be presented in a manner that is clearly understandable and accessible, however the effects of this requirement remain to be seen. The law also follows art. 6 EMFA by providing that editors, journalists, and other authors of content are independent and autonomous in their work within the media outlet's programme concept (Milosavljević & Biljak Gerjevič, 2026, p. 21).

In Luxembourg, the Draft Bill number 8625, presented 7 October 2025, 'seeks to limit economic influence on media by granting the Press Council a self-referral right (Art. 28bis), allowing it to initiate ethical investigations (...) without requiring formal complainant standing - a change praised by Press Council members as essential for proactive self-regulation' (Kies & Lukasik, 2026, p. 33).

3.2. Three focuses on Market Plurality

3.2.1. Focus 1 - The disclosure of media ownership information under Article 6 EMFA: interpretation and application across Member States

Article 6(1) requires media service providers to make

the ownership information listed in points (a) to (d) easily and directly accessible to their audience. This list encompasses not only basic information such as the legal names and contact details of media service providers (point (a)), but also the identity of direct or indirect owners with shareholdings sufficient to influence the operation and strategic decision-making, including ownership by a state or public authority or entity (point (b)). It further covers beneficial owners as defined by Directive 2015/849

(point (c)), and the total annual amount of public funds allocated for state advertising, as well as the total annual advertising revenues received from third-country public authorities or entities (point (d)).

Recital 32 of the EMFA clarifies that recipients of media services should have up-to-date media ownership information at their disposal, ‘in particular at the time they view, listen to or read media content, so that they can put the content in the right context and form the right impression of it’. It further specifies that the required information should be disclosed by the relevant media service providers in an electronic format, for instance on their websites, or through another medium that is easily and directly accessible.

Considering that recitals in European Union law are purposive and often used to interpret a norm (Klimas & Vaičiukaitė, 2008), read in conjunction with Recital 32, Article 6(1) EMFA should be interpreted as requiring media service providers to disclose the ownership information listed in points (a) to (d) directly to their audience. This means that ownership information must be available to recipients at the same time that they consume the content, whether in print or online (for example, in a newspaper or on a website). This is precisely why EMFA establishes two separate disclosure obligations under Articles 6(1) and 6(2) pursuing different objectives: the former relates to downward transparency and the latter to upward transparency.

However, current practice across Member States diverges from this standard. Prior to the application of the EMFA ownership disclosure rules, Article 5(1) of the Audiovisual Media Services Directive (Directive 2018/1808) and Article 5 of the E-Commerce Directive (Directive 2000/31/EC) required audiovisual media services and online media providers to disclose their legal names and contact details. The possibility introduced by Article 5(2) of the AVMSD led some Member States to enact laws extending the disclosure obligations for audiovisual media service providers to include beneficial

ownership. In any case, even where Member States extended the disclosure obligation, this was restricted to the audiovisual and online sectors; other types of media service providers, such as print media, were excluded, except where similar requirements existed in some Member States (Cole & Etteldorf, 2024). Furthermore, the identity of direct or indirect owners with shareholdings—including ownership by a state or public authority or entity—and public funds allocated for state advertising are new categories introduced by points (c) and (d) of Article 6(1) EMFA, and were therefore generally absent from national legal frameworks on ownership transparency.

MPM2026 data indeed shows that the problem is twofold. First, not all types of media service providers effectively disclose ownership information. Second, not all the information listed in points (a) to (d) of Article 6(1) EMFA is disclosed. According to the MPM2026, only Estonia and Poland currently present a low level of risk regarding the effective disclosure of ownership information required by Article 6(1) EMFA. Even so, the Polish country researcher notes that for audiovisual providers and operators of video-sharing platforms subject to the 1992 Broadcasting Act, information is available on their websites, whereas for other types of media, the information remains dispersed (Klimkiewicz, 2026). In Estonia, while ownership information from different types of media is available, financial information—including public funds allocated for state advertising—is not yet disclosed. This gap is expected to be addressed by a draft law amending the Media Services Act, for which approval is anticipated for 2026.

Article 6(2), on the other hand, does not impose obligations on media service providers. Instead, it places a direct obligation on Member States to designate a national authority or body responsible for developing national media ownership databases containing the information listed in Article 6(1). Specifically, the provision sets out two key requirements: first, Member States must identify the responsible

authority; and second, that authority must develop a database containing the relevant ownership information. The problems of incomplete ownership disclosure and uneven availability of information depending on the type of media service provider may, therefore, also affect the full application of this provision at the national level.

In this regard, at the time of the MPM2026 data collection, eleven Member States had not yet established a media ownership database as required by Article 6(2): Austria, Belgium, Cyprus, Denmark, Finland, Hungary, Luxembourg, Malta, Romania, the Czech Republic, and the Netherlands. Of these, some have since adopted, or are in the process of adopting, legislation aimed at aligning their national frameworks with EMFA requirements, including those on ownership transparency. This is the case for Austria, Denmark, Finland, Luxembourg, Malta, and the Czech Republic (see Table 3.1, Annex 3). Furthermore, of the 16 Member States that already have an operational database, only four make available all the information required by Article 6(1): Estonia, Latvia, Slovakia, and Sweden.

A final shortcoming revealed by the MPM2026 assessment is the level of the general public's accessibility to ownership databases. Even in countries where these databases exist, they are not easily or freely accessible. For instance, in Italy, the Register of Communication Operators (ROC) and the Register of Beneficial Owners (RTE), though containing comprehensive data on media ownership structures, are not publicly accessible, and can only be consulted by registered entities and competent authorities. Indeed, the RTE was originally conceived as a publicly accessible register but this was suspended as a consequence of the Court of Justice of the European Union (CJEU) decision on Joined Cases C-37/20 and C-601/20 (Vigevani et al., 2026). Likewise, in Greece, public access to databases is limited due to technical and procedural barriers (Papadopoulou & Angelou, 2026).

3.2.2. Focus 2 - Market power and opinion power. The Media plurality test in EU countries

As the results of the Media Pluralism Monitor show, a high concentration of media ownership has always posed a significant risk to pluralistic media offerings and effective exposure to diversity. Under Art. 22 of EMFA, the Member States are obliged to introduce the so-called "Media plurality test", to assess the impact of media market concentration on media pluralism and editorial independence. Since 2025, the MPM questionnaire contains a variable that asks for the existence, in national law, of rules and procedures that allow for an assessment of the impact of mergers involving media on media pluralism and editorial independence. The results are visualized in Figure 3.d.

In four countries (the ones in green in the figure: Finland, Italy, Portugal, Sweden) there are rules and procedures to conduct the assessment requested by Art. 22. These rules pre-existed the EMFA obligations in Italy and Portugal, although their interpretation and effectiveness within the new European legal framework remains to be seen (Vigevani et al., 2026; Cádima et al., 2026). Finland and Sweden introduced the Media plurality test with new laws implementing EMFA: in both cases, the correspondent provisions designate the competent authority and, as regards criteria and elements to be taken into consideration, replicate the phrasing of Art. 22.

In the 16 countries coloured in red, the Media plurality test was not in force at the time of the MPM assessment. This group includes different situations. In the majority of cases, Art. 22 is in course of implementation with draft laws while in some cases there is no separate assessment on media mergers and no draft law to introduce it (Cyprus, Lithuania, and Romania). Likewise, there are countries in which a general law to implement EMFA has been approved, but without any provision on media market concentrations (this is the case of Greece and Malta); and countries in which a separate assessment for media mergers is requested, but with

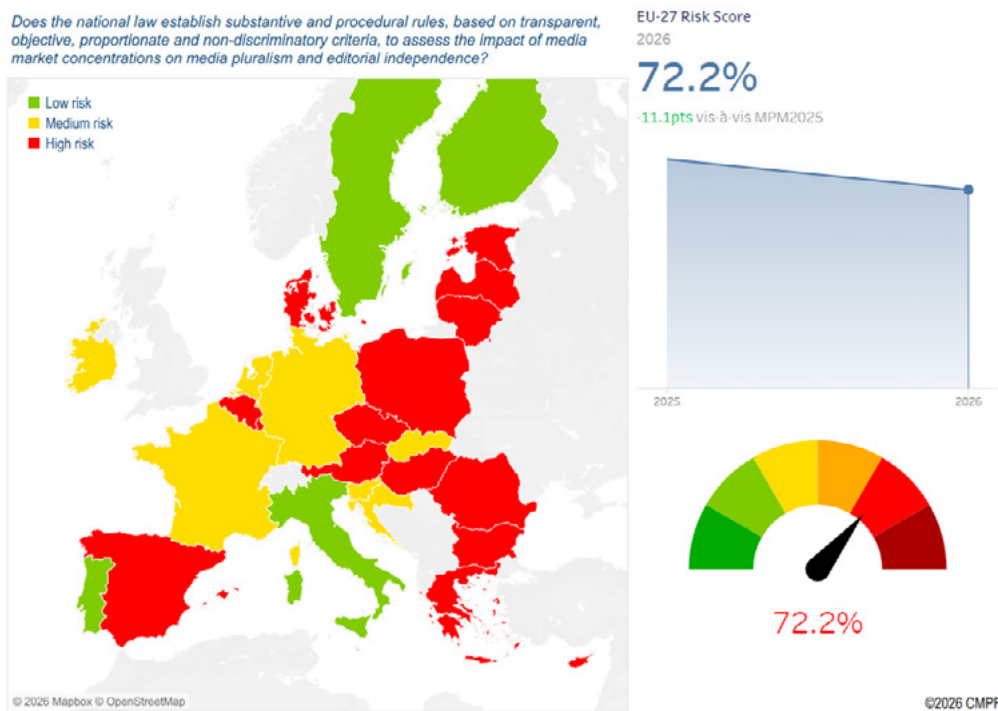


Figure 3.d. Media plurality test (variable 61) - map of risks per country

criteria and procedures that cannot be deemed as transparent, objective, proportionate and non-discriminatory (Hungary).

Among the seven remaining countries (in yellow: Croatia, France, Germany, Ireland, Slovakia, Slovenia and the Netherlands) there is some sort of Media plurality test, but with issues of compliance with Art. 22 EMFA. In France, Germany and Slovakia, the pre-existing legal framework already had a separate assessment on (some) media mergers but rules and procedures need to be updated. In France, ARCOM has called for its fast implementation and has been mandated by the French government to work on it (Ouakrat & Lupovici, 2026). The process is more advanced in Germany, with the 9th amendment to the State Media Treaty in course of approval. In Ireland and Slovenia, the recently approved laws present some limits, according to the media experts that implemented the MPM in those countries (Flynn, 2026, p. 27; Milosavljević & Gerjevič, 2026). In Croatia, the new rules on media mergers to comply with EMFA have been approved this year (2026). Finally, in the Netherlands there

are no legislative initiatives, but the framework of media mergers is evolving in practice. In the most recent procedure of RTL/DPG, the competition authority also sought input from the Commissariaat voor de Media and a range of other experts. Even though ‘an effective and official implementation of Art. 22 of the EMFA) is still not in place, the ACM already took it into account when coming to their judgment’ (De Swert et al., 2026, p. 23). Table 3.1 in Annexe 3 summarizes the state of implementation of Art. 22 in the EU Member States.

3.2.3. Focus 3 - The impact of AI on media sustainability and in the newsroom

The rapid development of GenAI systems and their widespread use has profoundly impacted media industry and news consumption in recent years. Together with an epistemic transformation of the information sphere, the AI-turn offers powerful tools, impacting all the segments of the news value chain, from production to distribution and marketing (Yeung & Dodds, 2024). At the same time,

it further complicates the economic relationships between the actors that provide media content and the “uneasy bedfellows” (Simon, 2022), that are not only the digital gatekeepers that have been regulating the access to the media, through social media and search engines, but also the providers of AI systems that use media content to train their model and retrieve it directly to the users in the AI assistants answers. New risks include an acceleration of the digital disruption of the media business model (Sjøvaag, 2024; Peukert, 2025), infrastructural dependence (Dodds et al., 2025), as well as reduction of journalistic autonomy and media pluralism (Carlini et al., 2026). New opportunities may arise from the use of innovation in the newsrooms, the reduction of costs, and the possibility of participatory AI tools (Tseng et al., 2025).

In recent years, a huge wave of litigation between publishers and AI has occurred, particularly in the US.⁵ In parallel, many media companies followed an alternative strategy, by signing deals with AI companies for the use of their content. In the EU, ‘licensing news content now appears to be one of several

possible avenues for the sector, although deals on content monetisation (e.g. with platforms and AI companies) may mostly involve large media companies’ (European Media Industry Outlook 2025, p. 8).

The Media Pluralism Monitor results include the impact of AI on the plurality of the media market, in two indicators, respectively addressing the issue of the economic relationships between publishers and AI companies, and exploring the existence of innovative practices in newsrooms.

In the indicator on Plurality in digital markets, a group of variables focuses on the financial agreements between media providers and tech companies (addressing separately the case of negotiations with digital intermediaries, such as the search engines and social media, and the emerging cases of deals with AI providers). In the majority of EU countries there are negotiations with digital intermediaries, even if just to a limited extent.

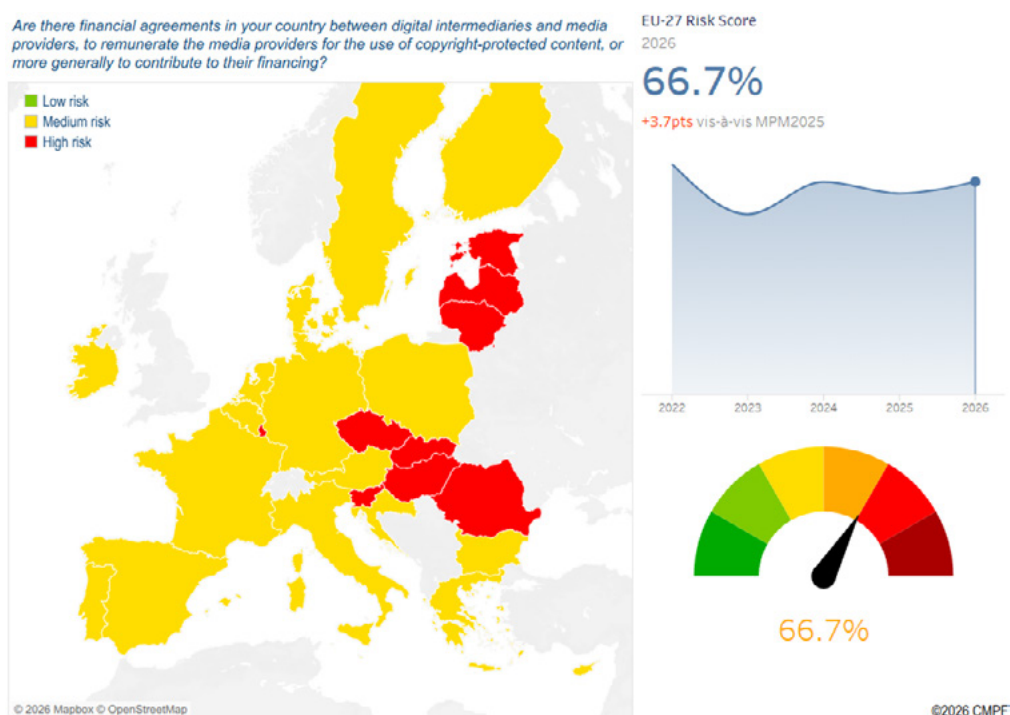


Figure 3.e. Financial agreements between publishers and online platforms (variable 76) - map of risks per country

⁵ In April 2026, 130 Copyright Lawsuits v. AI companies were reported, 100 in the US and 30 in the rest of the world. (<https://chatgptiseatingtheworld.com/2026/04/05/latest-world-map-of-copyright-suits-v-ai-companies-april-5-2026/>).

At the same time, deals between media providers and AI companies are less widespread, and are reported only in very few countries.

A follow up question in the MPM assessment asks about the transparency of such deals. The answers revealed that the conditions and economic content of deals that are reported remain unknown, even in general terms. What we do know is that these deals occurred in the bigger markets, that the licensed media content to come from such deals is in the most spoken languages of the EU, and that they predominantly regard the mainstream media.

In France, ‘...in 2025, several AI-media agreements aiming at compensating use of media content by AI-providers have been signed after *Le Monde* signed a lone agreement with OpenAI in 2024’, such as the ones between *Le Figaro* and *Le Monde* on the one hand, and the US startup Perplexity on the other. Following those deals:

new actors are trying to level the playing field such as APIG (Alliance de la presse d’information générale) and SEPM (Syndicat des éditeurs de la presse magazine), two press unions representing about 800 titles, which asked 25 of the main AI actors (OpenAI, Google, Microsoft, Bytedance, etc.) opened negotiations on the use of their contents. Surprisingly and quite abruptly, OpenAI refused to negotiate and announced to respect the opt-out (not to train their tool) decided by these media. However, several new agreements have been signed in 2025. It seems that publishers are betting on new actors of AI, including some French ones, in order to balance the dominance of OpenAI. For instance, the AFP has signed an agreement authorizing French AI startup Mistral to use its press releases in exchange for a remuneration. (Ouakrat & Lupovici, 2026, pp. 22-23).

Similarly, in Germany a trend toward individual agreements between publishers and AI providers is emerging (e.g., Axel Springer with OpenAI, RTL with Perplexity). These contracts grant AI services access to premium content in exchange for financial compensation. The lack of transparency remains problematic. The exact sums and conditions are subject to strict confidentiality agreements, making fair market valuation difficult for smaller publishers’ (Kalbhenn, 2026, p. 24). Similar patterns are reported in Italy and Spain. It is worth noting that the countries in which these deals are reported are also the ones in which regulatory and competition authorities are more active.

In Italy,

in July 2025, AGCOM adopted one of its first substantive enforcement decisions, determining the remuneration payable by a major platform (Meta) to the publishing group GEDI in the absence of an agreement between the parties (Delibera n. 180/25/CONS). This marked the transition from a purely regulatory framework to an operational dispute-resolution mechanism, whereby the Authority directly sets compensation based on criteria such as advertising revenues, audience reach, and the economic value of content⁶. (Vigevani et al., 2026, p. 29).

In Spain, in 2025 ‘two major lawsuits involving the two digital companies that dominate the digital advertising market in Spain were resolved. A Madrid court ordered Meta to pay €542 million to newspaper publishers’ associations and advertising rights companies for the fraudulent use of data to personalise advertising. A similar lawsuit against Meta, filed by major radio and television companies demanding €160 million for the same reason, is still pending judgment. The second lawsuit involved Google, which was being investigated by

⁶ In May 2026, the Court of Justice of the European Union ruled in favour of the Italian legislation, in connection with Meta’s action against the AGCOM’s decision (Case C-797/23). ‘The Court finds that a right to fair compensation for publishers is consistent with EU law, provided that that remuneration constitutes consideration for authorising their publications to be used online. Publishers must also be able to refuse such authorisation or to grant it free of charge. In addition, no payment may be required from suppliers when they do not use those publications’. (CJEU press release, <https://curia.europa.eu/site/upload/docs/application/pdf/2026-05/cp260069en.pdf>).

the National Markets and Competition Commission (CNMC) for abuse of its dominant position in negotiating with media outlets for the use of their content. The CNMC finally closed its investigation in 2025 after Google committed to informing publishers about the methodology used to calculate advertising remuneration, improving negotiation procedures with publishers, and updating the agreed payment amounts annually, among other things'. (Suau Martinez et al., 2026, p. 25).

The role of collective management organisation in the licensing negotiations is still limited, as shown by the map below.

In Belgium, the law transposing the EU copyright directive

empowers the Belgian Institute for Postal Services and Telecommunications (BIPT), to impose remuneration where platforms and press publishers fail to reach an agreement. Additionally, the Act establishes a mandatory right to remuneration for authors and performers, managed collectively through Collective Man-

agement Societies (such as Sabam), to be paid by platforms disseminating their works online, including streaming services. However, this act was challenged by Meta (Facebook), Google and others before the Constitutional Court, which referred 13 questions to the Court of Justice of the European Union (CJEU) for a preliminary ruling in an annulment action. (Kuczerawy & Wauters, 2026, p. 23).

In Denmark, 'The Danish Press Publications Collective Management Organisation (DPCMO) plays an important role in negotiating agreements with platforms on behalf of publishers. In 2025, DPCMO intensified its efforts to secure compensation for the use of journalistic content in AI systems' (Simonsen, 2026, p. 25). Developments on the matter are also reported in the Czech Republic where,

the Ministry of Culture authorized the Czech Publishers' Licensing Association (SLPV), representing the main market players, to negotiate licensing agreements with platforms such as Google and Meta. The association also intro-

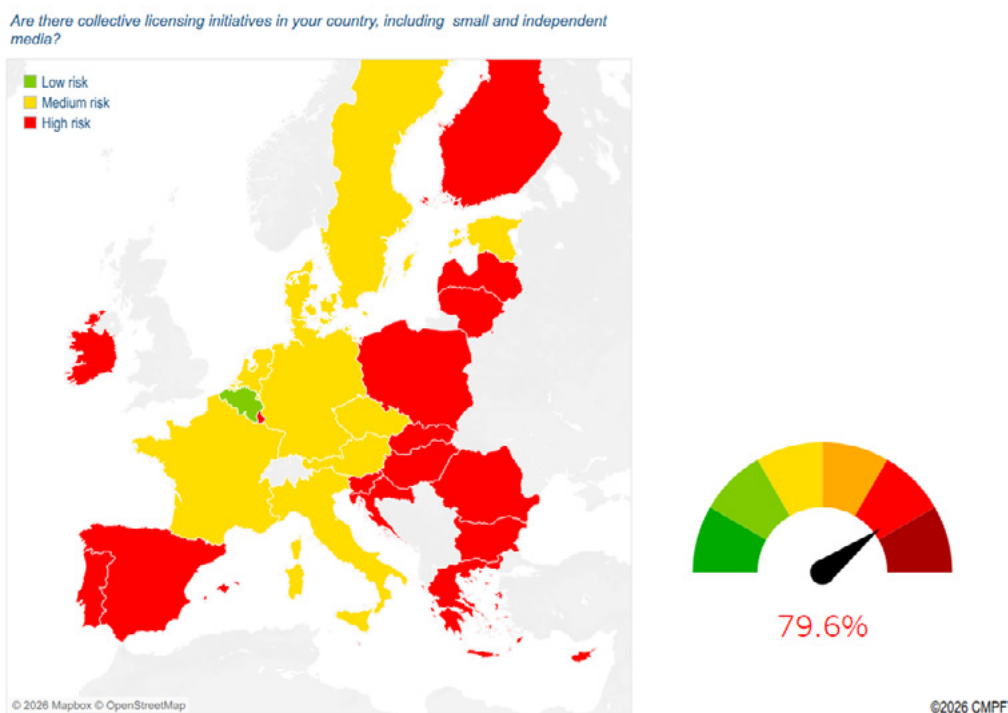


Figure 3.f. Collective bargaining initiatives (variable 80) - map of risks per country

duced a draft tariff scheme outlining how fees for the use of news content could be calculated. However, despite some initial contacts, key platforms have not entered formal negotiations, and no agreements with them have been concluded to date. (Štetka et al., 2026, p. 19).

The results summarized above allow us to track some interesting evolutions in the economic relationships between media and tech companies, but these are limited to the biggest markets and biggest media. Initiatives aimed at extending the benefit of the deal (or open new ones) to small publishers and new entrants are still very limited and far from effective.

In parallel, the use of (generative) AI in newsrooms could potentially foster innovation and improve sustainability, if done correctly (for example, by following the guidelines set out by the Council of Europe⁷). While only mentioned in a handful of country reports, according to the MPM2026 data collection there has been an uptake in the use of AI in European newsrooms ‘to help with internal processes, like translations or summaries’ (Toma et al., 2026, p. 23). During the data collection, artificial intelligence was mentioned as an example of innovation in newsrooms, where it is being implemented to improve their appeal, competitiveness and economic viability. However, there was limited space to assess whether the use of certain AI solutions could turn out to be counterproductive for news media. In the case of Poland, it was highlighted that there is a ‘very strong conviction among both news professionals and users that innovations need ethical guidance and structures under which they can be safely used’. The country team mentioned a study commissioned by the media regulator (KRRiT), titled *AI—Media in the Age of Algorithms*, which ‘showed that audiences (over 95% respondents) are not ready for a replacement of anchors or media presenters by artificial intelligence

[KRRiT, 2025]. Also, audiences miss unambiguous labelling of AI-created content—which needs to be, in their views, more transparent than [it] currently is’ (Klimkiewicz, 2026, p. 23). Moreover, in the case of Hungary, it was highlighted that AI technologies can be misused by media that do not abide by self-regulation: certain government-controlled news media relied on AI to create false evidence and to orchestrate smear campaigns ahead of the national election (Bleyer-Simon et al., 2026).

3.3 Recommendations for Market Plurality

The results of MPM2026 highlight once again the risks for media pluralism that originate in the economic sphere. All the indicators contribute to the average high risk. Those that measure concentration in the media and digital markets, and the existence of regulations and policies to contrast it, are in the very high-risk band. 2025 was the first year of implementation of the EMFA provision, which includes a section on restoring openness and fairness in the media markets. Moreover, this year marks the full implementation of the EU digital markets regulation. While these regulatory developments have been registered in the MPM monitoring exercise, they have not yet led to significant changes in average risk scores.

In the indicator on **Plurality of media providers**, in fact, the improvement of the assessment on the legal framework, mainly due to the EMFA novelty of the ‘media plurality test’, is counterbalanced by an accelerating tendency toward consolidation. In this regard, the main challenge is to balance media sustainability with media market plurality and diversity. The first cases in the EU show the tendency for the media authority to admit mergers on economic grounds, imposing remedies to safeguard media pluralism and editorial independence.

⁷ Council of Europe (2023, Dec. 12). *Freedom of Expression : News Guidelines on the responsible implementation of artificial intelligence (AI) systems in journalism*. <https://www.coe.int/en/web/freedom-expression/-/guidelines-on-the-responsible-implementation-of-artificial-intelligence-ai-systems-in-journalism>

The indicator on **Plurality in digital markets** shows an identical risk level to last year. Concentration is very high in the online advertising market, whereas measuring audience share is hindered by a lack of official data, barriers to access proprietary data despite the transparency obligations set by the EU regulations, and a lack of transparent metrics and shared industry standards. Economic relationships between media content providers, on one side, and online platforms and AI providers on the other, are developing on the ground in the biggest markets, but they are limited to the big media companies and their content remains undisclosed.

In parallel, the other indicators in the area are stable at the medium-high risk level, showing no significant improvement in the average score in terms of media ownership's transparency, media economic sustainability and protection of editorial independence from influences that derive from economic pressure of owners and/or advertisers.

EU institutions should:

- Monitor compliance with the transparency obligations under Article 6(1) and (2) EMFA and issue targeted guidelines to assist Member States in meeting these requirements where needed.
- Monitor and guarantee the compliance of the Member States to Art. 22 of EMFA, to ensure the effectiveness of the harmonised legal framework on media market concentrations.
- The EC, in consultation with the European Board of Media Services, should publish guidelines for the assessment of media market concentrations, specifying the order of priority of the elements to be taken into consideration to assess the impact of media market concentrations on media pluralism and editorial independence.
- The European Board of Media Services should become fully operational and cooperate closely with the designated authority to implement the 'media plurality test'.
- Enforce the transparency and data sharing obligations of digital gatekeepers under the DMA, in the online advertising sector; use competition enforcement to tackle abuse of market power in the online advertising chain.
- Address the challenges to the old copyright regime framework deriving from the developing of GenAI systems, to guarantee certainty of law and fair remuneration for authors and media content providers.
- Evaluate the use of other tools to promote fairness in the digital and media markets, including the adoption of a digital tax or levy, with the possibility of earmarking part of its revenue to support media pluralism.
- Provide dedicated support for independent news media and facilitate knowledge sharing on media financing and innovation.

Member States and national regulatory authorities should:

- Ensure and monitor the operationalisation of transparency obligations under Article 6(1) and (2) of the EMFA.
- Guarantee implementation of the rules and procedures for the 'media plurality test' in case of media mergers.
- Monitor and address risks related to media ownership concentration, at national and local levels.
- Collect and publish market and audience data on all the media sectors, at national and local levels.
- Foster the introduction of audience measurement systems inspired by the principles and criteria of Art. 24 EMFA, to guarantee transparency and openness of the digital markets.
- Encourage collective licensing initiatives by the media content providers, in order to include smaller, diverse and local media.

- Implement and oversee compliance with obligations on the disclosure of media ownership information and the development of national databases, as set out in Article 6(1) and (2) EMFA.
- Introduce adequate, transparent and fairly allocated public support schemes for private media—including online.

The media industry and the journalists' association should:

- Strengthen self-regulation and press councils to support newsroom independence from owner and commercial interests. Ensure the disclosure of ownership information according to Article 6(1) of the EMFA, covering all elements listed in points (a) to (d).
- Promote and adopt guidelines for an ethical and transparent use of AI in the newsrooms
- Promote collective licensing initiatives to rebalance asymmetries in the media and digital markets, particularly in the negotiations on remuneration of media content used by the platforms and/or GenAI providers
- Include the journalists' representatives in the negotiations with the platforms and AI companies in order to distribute the revenue along the media value chain, and evaluate the impact of newsroom innovations on employment and working conditions
- Introduce safeguards for editorial independence and the integrity of journalists and editors in line with the Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector.
- Promote innovations, the development of sustainable business models, and the sharing of best practices in journalism.

Chapter 4
**Political
Independence**

4.1. In-depth results

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the state and of political power over the functioning of the media market. In addition, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.

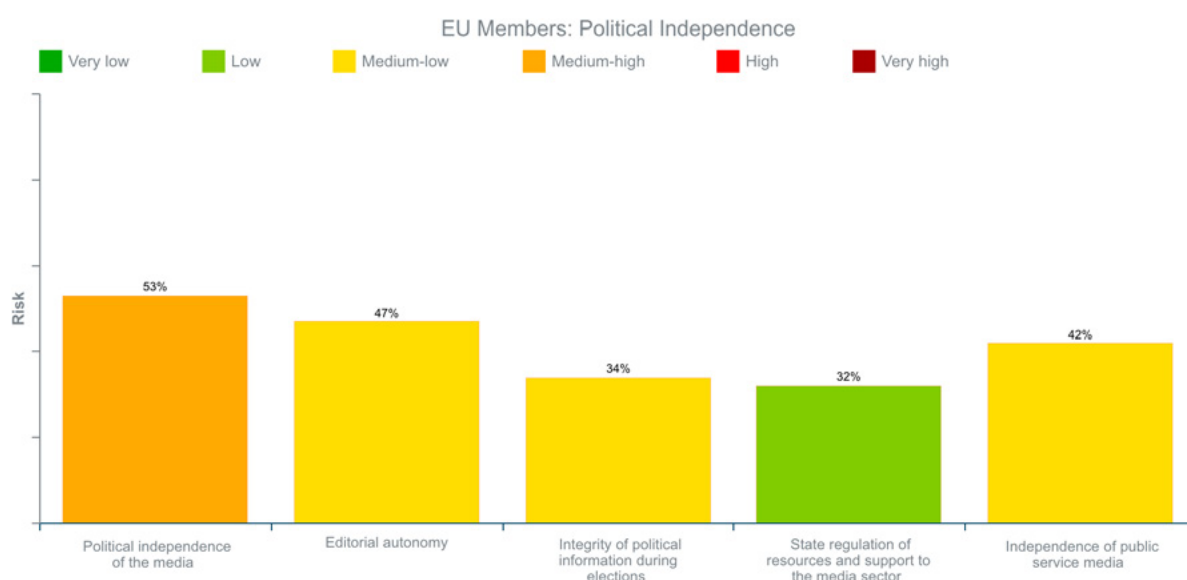


Figure 4.a. Political Independence area. Averages per indicator

Most of the indicators investigated under the **Political Independence** area reveal risk increases. The indicator **Political independence of the media** moved from the medium-low, to the medium-high risk band. This reflects increased politicisation of media ownership either through direct or indirect means, allowed by partial or inefficient regulatory safeguards. The indicator **Integrity of political information during elections** risk level also deteriorated, passing from the low, to the medium-low band. This was mainly due to a marked worsening in the *Rules on political advertising in the media* risk score, which reflects weak-

nesses in ensuring adequate transparency to political advertising services across broadcast media and online media outlets. However, it is important to underline that these issues are even more acute on online platforms, where issues of transparency and the enforcement of political advertising rules are even more problematic. The indicator **Independence of public service media** remains in the medium-low band. While deterioration is limited at the indicator level, the analysis in terms of governance and funding structures indicates significant risk increases. Finally, the indicators **Editorial autonomy** and **State regulation of resources and support**

to the media sector improved slightly. In the first case, the MPM analysis detected some positive developments with collective or cross-sectorial self-regulatory safeguards. However, the situation remains highly fragmented. In the public financing case, new obligations under EMFA Art. 25 are prompting state institutions and media service providers to reveal expenditure for state advertising. While some improvement is observed, the process is slow-paced and country specific.

POLITICAL INDEPENDENCE OF THE MEDIA MEDIUM - HIGH RISK

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

The indicator **Political independence of the media** moved from the medium-low, to the medium-high risk band. Half of the countries fall under higher risk zones (from medium-high to the very-high), reflecting a lack of comprehensive and effective safeguards against political influences through direct or indirect ownership and conflict of interest. Three countries score in the very-high risk band (Malta, Romania, Cyprus), three in the high-band (Hungary, Slovenia, Slovakia), seven in the medium-high band (Greece, Italy, Spain, Poland, Bulgaria, Latvia, Croatia), ten in the medium-low (Estonia, Denmark, France, the Czech Republic, Lithuania, Luxembourg, Finland, Portugal, Austria, the Netherlands), and four in the low band (Sweden, Ireland, Germany, and Belgium). The passage to the medium-high risk category, in aggregate terms, is particularly significant, since it confirms problematic issues already observed in recent implementations.

On the one hand, data suggest an increased parallelism between media ownership patterns and politics, with an ultimate impact on management choices and editorial output. This includes actual cases of direct and indirect control by politicians through ownership means, powerful business actors seeking to influence politics to secure favourable conditions for their non-media activities, and a preventive posture from owners to avoid conflict with political power. In Slovakia, risks persist after major personnel and editorial changes in TV Markiza and TV Joy occurred over the course of 2024, exemplifying indirect editorial control by owners to avoid reporting that might hinder state-related business interests (Urbanikova, 2026, p.28). Other country cases highlight the presence of media magnates who are not strictly political actors, but who exert significant influence over the political sphere, be it for purely political or commercial goals. In France, the influence of Vincent Bolloré over certain television outlets (notably CNews, Europe 1, and Le JDD) has continued over the course of 2025 (Ouakrat & Lupovici, 2026, p.28). In Italy, Silvio Berlusconi's heirs exercise a powerful informal role in shaping the direction of the party Forza Italia (Lamberti, 2026, as cited in Vigevani et al., 2026, p.38). As argued by Il Post, "One might say, with only a slight oversimplification, that for the Berlusconis, the party is a sort of extension of their business: it is through the party that they can influence politics, and it is through the party that they can ensure the government makes certain decisions in their favor"; including in the media sphere (Il Post, 2026).¹ Strong direct and/or indirect political control via ownership persists in Malta and Hungary, but several other countries present politicised ownership structures as well, especially at the local level. From a strict regulatory point of view, the case of the Czech Republic is notable, where a constitutional ruling reinstated the possibility of direct political ownership after the positive developments reported in the previous MPM Implementation (Štetka et al., 2025, p.7).

¹ Mediaset/MFE continues to be a leading group in terms of both audience and market share.

On the other hand, data suggest an increased interventionism of the state in media ownership, based on national security reasons. Notable is the case of Poland, where the listing of the two largest commercial TV companies (TVN, Polsat) among the strategic entities eligible for the protection of authorities, enabled the government to use its veto in case of ownership changes. So far, it is unclear if this will have an impact on the ongoing takeover of WBD by Paramount Skydance (Klimkiewicz, 2026, p.28). While most of the concerns about foreign political influence through ownership means are found in candidate countries (see the case of Montenegro, as outlined in the chapter on candidate countries), the Russian full-scale invasion of Ukraine is increasingly shaping media governance and ownership-related patterns in the EU27 as well. The MPM notes that these restrictions concerning foreign ownership are generating debate regarding proportionality and freedom of expression, highlighting the tension between safeguarding national security and preserving media pluralism within democratic societies.

Finally, this year's findings indicate that the digital native media sphere is increasingly characterised by the multiplication of online outlets with unclear ownership and a pronounced anti-establishment and/or far-right attitude. In some cases, this seems to be the effect of a coordinated action, the outcome of which is traceable in terms of biased political advertising practices, disinformation narratives, or blatantly skewed editorial content.

EDITORIAL AUTONOMY

(Art.6(3) EMFA and EC Rec.
(EU)2022/1634)

MEDIUM - LOW RISK

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

The findings for this indicator reflect a widespread absence of comprehensive cross-sectorial self-regulatory measures aimed at protecting the media from political influence, a severe fragmentation and ineffectiveness of internal safeguards, and a lack of mechanisms capable of preventing politically or commercially motivated appointments and dismissals of editors-in-chief. Two countries score in the very-high band (Greece, Hungary), four in the high-band (Romania, Malta, Croatia, Slovenia), five in the medium-high band (Slovakia, Poland, Portugal, Austria, Bulgaria), eight in the medium-low band (the Czech Republic, France, Italy, Cyprus, Spain, Latvia, Lithuania, Sweden), four in the low band (Luxembourg, Ireland, Denmark, Estonia), and four in the very-low band (Finland, Belgium, Germany, and the Netherlands).

Collective or cross-sectorial self-regulatory instruments, as assessed by the sub indicator *External safeguards*, generally address editorial independence only in broad and imprecise terms. Furthermore, the bodies entrusted with oversight functions, including media councils, often lack either adequate enforcement powers or sufficient resources to effectively address complaints. Particularly high risks, in these terms, are detected in Malta, Romania, Hungary, Greece, and Slovenia. Nevertheless, some countries have reformed, or are in the process of reforming, their collective agreements, by introducing updated provisions to strengthen editorial independence (e.g. Slovakia). This impacted positively on the results for this indicator, albeit to a limited extent.

With regard to *Internal safeguards*, however, the situation appears decisively more fragmented and lacking in transparency. While leading media outlets in most countries have adopted internal codes intended to uphold journalistic standards, these safeguards are frequently reported to be insufficient in terms of both the scope of protections and the procedures available to counter political interference. Moreover, only a limited number of countries report the existence of well-functioning internal

bodies, such as editorial committees or internal councils, capable of effectively implementing these self-regulatory mechanisms. Measures, where they exist, are often not publicly accessible, making it difficult to assess their quality and comprehensiveness. Notably, these findings concern only the leading media actors in each country and sector, suggesting that the broader situation may be even more problematic, particularly in the online environment and at the local level.

What, however, has the greatest impact on the level of risk is a general lack of specific measures aimed at ensuring that the *Appointments and dismissals of editors-in-chief* are protected from political and/or commercial interference. Newsroom councils rarely possess veto powers in cases involving controversial nominees or manifestly opaque and biased appointment procedures. Likewise, ad hoc representative bodies responsible for appointing editors-in-chief and safeguarding their autonomy and independence are largely absent across the countries analysed. An interesting law proposal from 2023 was drafted in France ‘to condition the attribution of public subsidies only to media granting voting rights to journalists for the nomination of the chief-editor’. However, it remains a dead letter (Ouakrat & Lupovici, 2026, p.29).

Although the overall situation with this indicator remains problematic, it is important to note that, where such safeguards are available and effectively implemented, they produce meaningful results. This underscores the importance of these instruments in protecting editorial independence and responding to the increasing risks associated with political ownership control and other forms of influence, including political and state advertising.

INTEGRITY OF POLITICAL INFORMATION DURING ELECTIONS

MEDIUM - LOW RISK

The indicator on Integrity of political information during elections assesses the existence and implementation of regulatory and self-regulatory frameworks for the fair representation of different political actors and viewpoints, as well as fair access, equal conditions, transparency, and monitoring of political advertising across public service media, private media and online platforms during electoral campaigns.

This indicator falls in the medium-low risk band, presenting a deterioration in the risk level. Hungary and Malta are the worst performing Member States – both falling in the high-risk band. Most Member States either scored in the low- (13) or medium-low (6) risk bands. Only three Member States fall in the very-low risk band (Czech Republic, Sweden, Estonia), with the same number falling in the medium-high risk band (Slovenia, Cyprus, Greece).

A deterioration in the risk score was observed for the sub indicator on *PSM bias in the electoral period*. While most Member States have rather effective legal safeguards to ensure that actors across the political spectrum are equally represented in PSM, smaller political actors often face more difficulty in accessing media space. Over 2025, concerns were detected in Poland, where the OSCE-ODIHR (2025) cited evidence of strong bias in PSM coverage of the elections. In line with previous results, the legal safeguards appear to be weaker for the commercial audiovisual media sector (sub indicator *Private audiovisual media bias in the electoral period*). Concerns about proper implementation in private media were evident in Romania (which held a re-run of its elections in 2025) wherein strong biased coverage was reported (ODIHR, 2025).

A deterioration also was detected for the sub indicator *Rules on political advertising in the media*. Legal safeguards to ensure equal opportunities for

buying political advertising on traditional media are generally in place, with most Member States either prohibiting paid political advertising (particularly on PSM)—making free slots available around the time of elections (e.g., Czech Republic)—or strictly defining the conditions for political advertising placement. As a result, few issues of unequal opportunities, including discriminatory pricing lists, were reported. However, labelling requirements that are in place at the national level are less exhaustive than the strict labelling requirements required by Regulation (EU) 2024/900 on the transparency and targeting of political advertising (TTPA), and were found, quite often, not to cover the online sphere. Moreover, evidence from the MPM suggests that the countries of the EU’s external border are particularly exposed to third-country-sponsored political advertising, particularly Latvia (which had elections in 2025), Poland and Bulgaria, which all scored in the high-risk category. Finally, several Member States have still not formally allocated an independent authority to oversee political advertising allocation under the TTPA, while a lack of effective monitoring from Data Protection Authorities (DPA) continues to be reported, especially in Eastern Europe. The combination of these factors has impacted negatively the risk score for this sub indicator.

Most concerns, however, are detected within the sub indicator *Rules for political advertising on online platforms*, which also reported significant developments based on the TTPA and the subsequent ban imposed by platforms. Most Member States either lack robust or targeted national rules requiring transparency related to the amount of spending by political parties, or political parties fail to comply with existing transparency obligations. There is also a lack of transparency with the targeting techniques used. This issue was reported in several Member

States—notably in Germany, Poland and the Netherlands—which all held national elections in 2025.² Notably, several Member States reported issues with the effectiveness of the ban on political advertising by several VLOPs (Bulgaria, Croatia, Hungary), with actors reportedly still being able to disseminate political advertising, by mislabelling content. The MPM data also reveals evidence of the use of fake/inauthentic influencer accounts and (pseudo-) organic, covert forms of political advertising (Hungary, Romania). On the whole, most Member States have not been very proactive in monitoring influencer activity. The absence of existing national rules governing influencer activity underscores the importance of the TTPA going forward.³

STATE REGULATION OF RESOURCES AND SUPPORT TO THE MEDIA SECTOR

LOW RISK

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

This indicator was subjected to a slight decrease, mainly due to some country development and a tentative start with implementation of Art. 25 of the EMFA provisions. Only one country (Bulgaria), falls under the high-risk band. Three countries scored in the medium-high risk (Hungary, Malta, Cyprus), four in the medium-low band (Croatia, Luxembourg, Latvia, Poland). The rest of the countries scored in the low-risk band, with three in the very-low band (Portugal, Estonia, Denmark).

² Note that the TTPA was fully applicable only in the last case.

³ The TTPA includes influencers under its purview, with the detailed labelling and disclosure requirements also applying to them. Before the TTPA, most Member States either had no rules to regulate influencer activity, or they relied on the general provisions of consumer protection and advertising law (e.g. Ireland).

The sub indicator on *Spectrum allocation* continues to reflect general respect for the regulatory principles and policy objectives established under the Radio Spectrum Policy Programme (RSPP 2012). Hungary continues to be the only Member State with medium-low risk issues, in these terms. In Spain, it was reported that the regulatory framework needs to be updated ‘to reflect the current radio landscape and to integrate all legally operating broadcasters’ (Suau et al., 2026, p.34).

The distribution of state subsidies also appears unproblematic, according to the related sub indicator *Distribution of government subsidies*. Most Member States provide some form of direct public funding to the media sector. Nevertheless, concerns may still arise regarding the fairness of the criteria and the actual distribution of funds in practice. Bulgaria and Cyprus are the highest risk-scoring countries, in these terms, with very-high and high-risk scores, respectively.

The most problematic sub indicator remains *Distribution of state advertising*. High risks are detected both in terms of regulatory safeguards, and actual practice with allocation, with more than half of the countries scoring in the very-high-risk band. At the same time, slight improvement was reported due to the entry into force of Art. 25 EMFA. While implementation under this article is generally lagging, several countries have designated a National Regulatory Authority to address the specific obligations under the new Regulation. Besides, in some Member States (e.g. Germany) public institutions and bodies have reportedly started to disclose expenditure. The overall picture, however, continues to be highly concerning both in terms of fairness, and transparency (see focus).

INDEPENDENCE OF PUBLIC SERVICE MEDIA (Art. 5 EMFA)

MEDIUM - LOW RISK

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

The indicator **Independence of public service media** remains in the medium-low risk band, signalling a slight deterioration. Almost half of the countries score in the higher risk bands, with three countries being assessed at a very-high risk (Slovakia, Hungary, Malta) and three at a high-risk (Greece, Italy, Poland). While in all Member States public service media operate within legal frameworks that formally regulate their governance structure, almost half of the countries report relevant procedural problems and notable cases of concern in terms of appointing management and supervisory bodies, with the related sub indicator (*PSM governance*) signalling a risk increase. Financial arrangements, likewise, remain vulnerable to political intervention. In several countries, public service media depend primarily on direct allocations from the state budget, while being deprived of additional protective mechanisms. This facilitates indirect political influence through the manipulation, reduction, or postponement of financial resources. Cases are reported of reforms that may actually increase politicisation, going in the opposite direction of the standards set under EMFA Art.5.

Over 2025, notable cases were detected in Lithuania, the Czech Republic, and Slovakia, but relevant instances of risk were also detected elsewhere. In the Baltic country, the budget of LRT was frozen, while a proposed amendment is causing uproar as it would simplify the process to dismiss the LRT director general (Jastramskis, 2026, p.5), thereby

augmenting risks vis-à-vis potential attempts of interference. In the Czech Republic, the new government's announcement to change the funding mechanism of the Czech Television (ČT) and Czech Radio (ČRo) would reverse the long advocated and expert-backed legal development that entered into force in 2025, ultimately reducing funding resources and increasing state discretion (Štetka et al, 2026, p.27; EFJ, 2026; IFJ, 2026; MAFFR, 2026). As for Slovakia, the appointment of a new director-general in a closed-door session in 2025 reinforced concerns over the system that was reformed under Act No. 157/2024 Coll (Urbanikova, 2026, p.4).

4.2 Three focuses on Political Independence

4.2.1. Focus 1 - The TTPA and the transparency of political advertising on online platforms: a real game-changer or a regulatory paradox? Some early insights from the MPM

The state of play of political advertising on online platforms in the European Union

The year 2025 marked an important year for strengthening rules on political advertising in the European Union, with the entry into force of Regulation (EU) 2024/900 on Transparency and Targeting of Political Advertising (TTPA) on 10 October 2025. This regulation introduces a harmonised regulatory framework across Member States as well as among different media sectors (i.e. print, audiovisual, online), whilst also addressing the emerging importance of influencers in political advertising. In a nutshell, the TTPA introduces: certain transparency and labelling requirements, with the aim of making it easier for citizens to spot political ad-

vertising content; stricter conditions for the use of personal data in order to prevent manipulative micro-targeting practices; provisions banning political advertising services to third-country sponsors during the three months preceding an election or referendum to prevent foreign interference (FIMI) during election periods; and designated national authorities tasked with monitoring compliance with the regulation.

However, right after the TTPA became fully applicable in October 2025, major online platforms (Meta, Google, LinkedIn and others) formally adopted a total ban on political advertising to avoid being burdened with these new obligations. On the one hand, this changed once again the conditions for political communication in the online sphere, with major consequences in terms of the transparency of sponsored content, and the techniques and strategies being deployed to promote political campaigns in social media platforms. On the other hand, the ban complicated monitoring by external parties, since its applicability now varies between media (including online media) and platforms. Based on this, and the fact that very few Member States have had major elections since the TTPA became fully applicable,⁴ a comprehensive assessment on the progress of its implementation was impossible in this year's MPM.⁵ Still, notable developments can be reported thanks to the MPM analysis, suggesting increased risks and major challenges ahead for a fair and transparent political communication in the online platforms' environment.

⁴ Stricto sensu, the Czech Republic held national elections (3-4 October) just before the TTPA entered into force and became fully applicable (10 October) and Ireland and the Netherlands held them shortly thereafter, at the end of October. Portugal and Estonia held local elections in October 2025, post-TTPA. As a result, the data sample is limited.

⁵ It is important to note that political ads are not allocated in the electoral period only, and the TTPA applies generally. However, electoral contests, and the periods right before, are the time frame in which political campaigning becomes more aggressive, especially online, where regulation is severely lacking.

Results on the designation of competent authorities responsible for monitoring and reporting

A first outcome of the analysis is the fact that several Member States (Belgium, Spain, Slovenia, Cyprus, Malta, Hungary, Poland, Portugal and Finland) have yet to officially designate a competent authority to oversee compliance with this Regulation. Ten Member States (Austria, the Czech Republic, Denmark, Ireland, Estonia, Lithuania, France, the Netherlands, Italy and Romania) have formally done so, and eight (Bulgaria, Croatia, Germany, Sweden, Slovakia, Greece, Latvia and Luxembourg) have announced plans to do so in 2026. In 2025, Germany outlined its plans in the proposed Political Advertising Transparency Act (PWTG). Croatia's 'Proposal of the Act Implementing Regulation 2024/900 on the Transparency and Targeting of Political Advertising' plans to assign three authorities—the Agency for Electronic Media, the Croatian Regulatory Authority for Network Industries (HAKOM) and the Personal Data Protection Agency (AZOP)⁶ to oversee the application and enforcement of the Regulation. As regards Sweden, as of January 2026, "The Swedish Agency for the Media is the competent supervisory authority for compliance with most of the regulation. The Swedish Authority for Privacy Protection (IMY) is the supervisory authority for the provisions regarding targeted political advertising online."⁷ In Slovakia, the implementation of the TTPA is included in the Legislative Plan of the Slovak Republic for March 2026.⁸ In Greece, there have been reports since September 2025 that Greece will prepare a proposal in 2026 (Papadopoulou et al., 2026). In Luxembourg, under the propos-

als of Draft Bill 8625, Autorité luxembourgeoise indépendante de l'audiovisuel (ALIM, formerly ALIA) will oversee compliance for all media sectors. Currently, ALIM is the National Competent Authority tasked with monitoring political advertising in the audiovisual sector alone (Kies et al., 2026).

General results on gauging the impact of the ban on political advertising by the VLOPs

Early insights from the MPM data collection suggest that the ban is not being enforced effectively by the VLOPs.⁹ This seems to depend, at least in part, from limitations in the platforms' automated detection system. Indeed, MPM data from the Czech Republic, Bulgaria, Croatia, Hungary and Romania, in particular, reveal that political actors have successfully exploited loopholes in VLOPs' automated systems of detection, by mislabelling content as non-political, avoiding explicit party branding, or even, craftily, in some cases, setting up Facebook groups seemingly about tourism and the environment in order to bypass the VLOPs' algorithmic filtering systems (Štetka et al., 2026, Spassov et al., 2026, Bilić, 2026; Bleyer-Simon et al., 2026; Toma & Popescu., 2026). Indeed, an investigation by Political Capital found that of the 1257 ads linked to Hungary's then-ruling party, Fidesz, only 45 (roughly 4%) of them were correctly labelled as political and eventually removed by Meta (Political Capital, 2026, as cited in Papp, 2026). As corroborated by a recent analysis by Liberties in the context of the 2026 Hungarian elections, Meta and Google's bans on paid political ads 'have not eliminated their use but have merely led advertisers to exploit regulatory weaknesses. These include simply not declaring

6 Government of the Republic of Croatia, Ministry of Physical Planning, Construction and State Assets. (2024, October 31). *Government session: A law to ensure effective application of EU rules on transparency of political advertising*. <https://mpudt.gov.hr/news-25399/government-session-a-law-to-ensure-effective-application-of-eu-rules-on-transparency-of-political-advertising/30630>

7 Integritetsskyddsmyndigheten. (n.d.). *Regulation on political advertising*. <https://www.imy.se/en/about-us/swedish-authority-for-privacy-protections-assignment/regulation-on-political-advertising/>

8 Ministry of Finance of the Slovak Republic. (2025). *Draft budgetary plan 2026*. https://www.mfsr.sk/files/en/finance/institute-financial-policy/strategic-documents/draft-budgetary-plan/draft_budgetary_plan_2026.pdf

9 This follows the widely documented issues facing TikTok in detecting and removing political advertising content during the 2024 Romanian presidential elections (BMFI, 2025).

ads as such, using proxy pages, coordinated manipulation of algorithms and paying smaller influencers’ (Arning, 2026). Overall, there is growing evidence that the ban by VLOPs is prompting, or at the very least, accelerating the shift¹⁰ towards less transparent forms of political communication, such as via (pseudo-)organic content, covert (fake) influencer-led campaigning, and, even more concerning, via coordinated amplification strategies¹¹ (see also: Pina, 2025).

Specific results on influencer-driven campaigning and coordinated inauthentic behaviour, before the TTPA’s full applicability

As of 2025, most Member States did not have any influencer-specific rules, self-regulatory measures or guidelines to govern the political advertising activities of influencers. Italy is a notable exception

with the introduction of a new ‘Code of Conduct for Influencers’ (*Codice di condotta per gli influencer allegato alla delibera n.197/25/CONS*¹²) in July 2025.¹³ Ireland has also been comparatively proactive in this regard. Whilst there is no specific Irish domestic law regulating influencer political advertising, in October 2025, the Irish Advertising Standards Authority signed a data-sharing agreement with the Competition and Consumer Protection Commission (CCPC) to improve regulatory oversight of influencer marketing in Ireland (Advertising Standards Authority, 2025).¹⁴ However, apart from these noteworthy examples, progress across the Union has been rather limited in this regard. It is telling that only a handful of countries—notably the Czech Republic, the Netherlands,¹⁵ Ireland and Italy—have some specific rules or guidelines in place to regulate influencers’ political advertising services (Ouakrat et al., 2026; Flynn, 2026; Suau Martinez

10 A shift which has been underway for several years since users are continuing to migrate to digital intermediaries for news consumption.

11 As several Country Teams of the MPM this year have pointed out, it is increasingly difficult to distinguish grassroots organic content, influencer-led political ads and coordinated manipulation networks for two main reasons: (1) the definition of political advertising is very broad and (2) transparency remains a pressing issue (Kalbhenn, 2026; Bilić, 2026). It is hoped that after the bedding-in period of the TTPA—when Member States will be actively monitoring compliance with the TTPA, including strict labelling requirements for influencers—that it will be easier to detect what is authentic, organic political content and commercial/sponsored (manipulated) content.

12 Autorità per le Garanzie nelle Comunicazioni. (2025). *Codice di condotta e linee guida in materia di influencer marketing* (Delibera n. 197/25/CONS, Allegato B). https://www.agcom.it/sites/default/files/media/allegato/2025/197_25_cons_allegato%20B_codice.pdf

13 Therein, “relevant influencers” that meet certain impact and reach criteria are obliged to register on a public register (“Elenco degli influencer”) provided and overseen by AGCOM. The code introduces mandatory identity disclosure requirements whereby “relevant” influencers are required to include their “legal name and surname and/or the nickname” on their profile presentations as well as declaring that they are registered in the AGCOM registry (“in elenco AGCOM”). Influencers should also use specific signage to identify any sponsorships and/or product placements in order to ensure that the commercial and political nature of their content is clear to the audience. The Code also establishes that AGCOM will actively monitor influencers’ activities using their investigative powers including requests for information. Although the Code of Conduct for Influencers is a strong statement of intent by AGCOM and puts Italy in a comparatively favourable position vis-a-vis other Member States concerning rules for influencers, it should be borne in mind that the TTPA includes a more specific and detailed set of labels such as notices identifying the sponsor, the aggregate amounts spent and disclose whether any targeting techniques used. Importantly, in theory the TTPA applies to all influencers regardless of their following or reach.

14 The agreement, in essence, allows the Advertising Standards Authority (ASA) to share details of social media influencers who fail to comply with advertising rules. The agreement facilitates the ‘effective and structured cooperation and coordination at national level’ and ‘swift and secured exchange of information’ among relevant national authorities as required by Article 22(7) TTPA. By referring non-compliant creators to a statutory body with investigative powers (CCPC), it equips authorities with administrative capacity to monitor and sanction influencers for transparency breaches. The data-sharing agreement builds on the joint ‘Guidance on influencer advertising and marketing’ guidelines for influencers and advertisers published by the ASA and CCPC in October 2023. (Competition and Consumer Protection Commission, & Advertising Standards Authority for Ireland. (2023). *Guidance on influencer advertising*. <https://www.ccpc.ie/business/wp-content/uploads/sites/3/2023/10/CCPC-ASA-Guidance-on-Influencer-Advertising.pdf>).

15 On 16 July 2025, the Media Act was amended so that influencers with as few as 5000 followers would fall under the purview of the Dutch Media Act. In practice, this means that all influencers may have to register with—and be overseen by—the Dutch Media Authority (CvdM), and they may have to adhere to the following rules: (1) ‘Advertising must always be recognizable. Covert advertising is prohibited; The use of clear hashtags and indicators is mandatory. [...] Transparency is essential. The viewer must be able to see at a glance that it concerns commercial content’ (Bos, 2025).

et al., 2026; Vigevani et al., 2026). Against this, data from the MPM indicates that influencer-driven campaigning is becoming a more prominent strategy for political parties. The most notable case occurred in December 2024, when the Romanian presidential elections were annulled by the Romanian Constitutional Court, citing a report submitted to the Romanian National Defense Council (CSAT). The report claimed propaganda activities on social media platforms—with influencers allegedly being paid to promote candidate Calin Georgescu on TikTok (Toma & Popescu., 2025, p.26)—likely backed by Russia (Ross & Popoviciu, 2025). This had immediate repercussions for Bulgaria too; in the country reports of campaign funding predominantly going to unofficial pages, spikes in activity from micro- and macro-influencers, and evidence of coordinated political promotion campaigns already emerged in the leadup of the June and October 2024 snap elections (Dimitarova, 2024; BMFI, 2025:33). After the Romanian events, a parliamentary commission was started to investigate Russian influence. (Nikolov, 2024, as cited in Spassov et al., 2025, p.28). Between 2010 and 2024, 69 million euros was reportedly spent by Russia on propaganda activities in Romania and Bulgaria, including problematic advertising (Koseva, as cited in Spassov et al., 2025, p.28). Similar issues were reported in Croatia (Gong, 2025).

As for 2025, issues were also reported in Romania for the re-run of the presidential election, where monitoring by the ODIHR election observation mission (EOM) found evidence of coordinated inauthentic behaviour (CIB) driven by bots, troll farms and inauthentic accounts (ODIHR, 2025). Similar concerns were also reported in Germany; investigations by GADMO (2025) found that during the 2025 federal elections, hundreds of opaque accounts masquerading as official party channels

emerged on Tiktok, spreading political ads—including those generated using AI—without any labelling or disclosure (GADMO, 2025, as cited in Kalbhenn, 2026). As a result, voters were not able to distinguish between authentic grassroots messages and coordinated influence operations (DRI, 2025). In Portugal, a journalistic investigation by Cyabra revealed an abundance of fake profiles in the X accounts of the three largest parties: promoting Chega and discrediting the AD and PS. The conclusions suggested ‘a coordinated strategy to weaken establishment parties while amplifying support for the far-right alternative’ (Cyabra, 2025).

Influencer-driven campaigning and coordinated inauthentic behaviour after the TTPA’s full applicability and subsequent ban by platforms

As mentioned above, the TTPA¹⁶ contains provisions that regulate the services provided by influencers. Whilst political opinions expressed in a personal capacity are generally exempt from the TTPA, if an individual receives remuneration from a third-party, the regulation’s rules on political advertising come into play. Specifically, if an influencer receives payment for spreading a political message, they must ensure that the content is clearly labelled and accompanied by a transparency notice. Findings from the MPM suggest that implementation is severely lagging, with relevant cases for concern emerging from the latest electoral turnouts in Europe.¹⁷

The most recent case concerns the 2026 elections in Hungary. Notwithstanding the TTPA’s full and direct applicability and the ban imposed by major platforms, the online environment was still allegedly ‘flooded’ with thousands of posts containing AI-generated content alongside pro-government messages circulated via influencers and accounts of unknown provenance (Figlarz, 2026)—a pattern

¹⁶ Under the TTPA, political advertising includes ‘paid content, sponsored search results, paid targeted messages, promotion in rankings, promotion of something or someone integrated into content, such as product placement, influencers and other endorsements’ (Recital 1).

¹⁷ As already noted, the MPM can provide only partial indications on influencers’ compliance under the TTPA in 2025, due to the very limited number of elections following TTPA’s full applicability. However, the current analysis complements MPM data with additional sources addressing the most recent developments on influencer-driven political advertising.

also observed in several analyses (Krekó et al., 2026; Nilsson-Julien et al., 2026; FactCheck.LT, 2026; Political Capital, 2026; Desmarais, 2026). Léderer, co-founder and director of the Hungarian watchdog, K-Monitor, observed that whilst the platforms' ban initially 'disrupted Fidesz's strategy of flooding the country with advertisements,' they still managed to evade Facebook's automated verification systems—and disseminate political ads regardless—shifting their strategy 'toward influencer-generated content that appears organic' (Léderer, 2026, as cited in Figlarz, 2026). To further complicate the enforcement of the TTPA, Léderer rightly points out that the transparency of influencers' activity is 'a complete grey zone because the Hungarian state has deliberately failed to appoint a supervisory authority to enforce the regulation' (Léderer, 2026, as cited in Figlarz, 2026).¹⁸

In the Netherlands—which held elections at the end of the 2025—incidents were reported of fake social media profiles springing up, allegedly run from abroad and funded by Russia (Bunskoek et al., 2025, as cited in Schuck et al., 2026). An investigation by RTL Nieuws identified over 550 fake accounts, many of which were allegedly posting from Nigeria and Ghana, with experts citing possible links to Russian influence operations (Bunskoek et al., 2025, as cited in Schuck et al., 2026). Following the RTL Nieuws report, CDA MPs raised parliamentary questions regarding possible electoral interference.¹⁹ Whilst the Dutch government refrained from commenting on individual cases and did not confirm any specific links to Russia, they acknowledged that these "troll armies" appeared to fit the pattern of foreign state actors wanting to un-

dermine democracy. However, the Dutch government played down their impact for the recent elections due to the small number of fake accounts detected,²⁰ and confirmed that they were pressing the social media platforms to act quickly to mitigate their potential impact.²¹

Although the parliamentary elections (3-4 October 2025) in the Czech Republic were, *stricto sensu*, held just a few days before the full applicability of the TTPA (and accompanying Act No. 234/2025 Coll.), as well as the subsequent ban (6 October 2025) on political ads on the main online platforms, Czech Radio reported on the prevalence of inauthentic accounts using fake identities to either smear or endorse political actors (Czech Radio, 2025). They also reported how these inauthentic accounts used paid advertising—labelled as 'sponsored'—in order to maximise the reach of these posts. Potentially exacerbating the negative impact of these inauthentic accounts was the fact that the platforms often reacted late to remove such profiles, allowing the content to spread before there was any takedown (Czech Radio, 2025). As a minor offsetting factor, TikTok reportedly removed several of these inauthentic accounts before the elections following concerns raised by the Czech Telecommunication Office of suspected foreign information manipulation and interference (FIMI) (ČTK, 2025).

Summary of the main trends

In conclusion, the MPM data demonstrate a deterioration in transparency, coupled with an increased reliance on covert channels (portals,²² unofficial accounts, bots, influencers) for digital po-

18 See also Civil Liberties Union for Europe. (2025). *Meta and Google advertising bans raise concerns for democratic debate*. <https://www.liberties.eu/en/stories/meta-google-advertising-bans/45513>

19 Ministerie van Onderwijs, Cultuur en Wetenschap. (2025). Open Overheid. <https://open.overheid.nl/documenten/eb797de2-51e9-4c25-b635-8256cf6f0ba7/file>

20 However, it remains an open question whether the number of fake accounts actually in circulation was higher than those detected.

21 Ministerie van Onderwijs, Cultuur en Wetenschap. (2025). Open Overheid. <https://open.overheid.nl/documenten/eb797de2-51e9-4c25-b635-8256cf6f0ba7/file>

22 In the Balkan regions, online portals were also flagged as a potential source of concern due to their opacity in terms of their provenance and ownership structures, the limited regulatory oversight governing the sector (e.g. Montenegro, Ružić, 2026) and their possible use as covert channels for state-sponsored political advertising (e.g. North Macedonia, Micevski et al., 2026). Although not falling under the TTPA's purview, the issues transpiring in these countries could easily apply to those

litical communication activities. In fact, the ban on political advertising by VLOPs appears to have shifted campaign strategies towards opaque (“pseudo-organic”) political communication, with influencer-led political communication becoming ever more relevant. Moreover, the ban appears not to be working effectively, as political messages bypass VLOPs’ automatic detection systems. In this situation, most Member States have not yet appointed oversight bodies to either enforce the regulation or address these concerns specifically in an effective and coordinated manner.²³ The end-result is an information environment lacking transparency, which is precisely what the TTPA aims to avoid.

4.2.2. Focus 2 - Recent developments with state advertising regulation and allocation under EMFA Art.25

As already underlined in previous MPM implementations, the politicised and untransparent distribution of state advertising consistently emerges as one of the most pressing challenges to media pluralism in the European Union. Media-specific rules governing allocation exist only in a few countries, while general public procurement schemes prove largely insufficient in ensuring fairness and transparency of state ads allocation.²⁴ The MPM 2026 results continue to show a concerning high-risk level for the

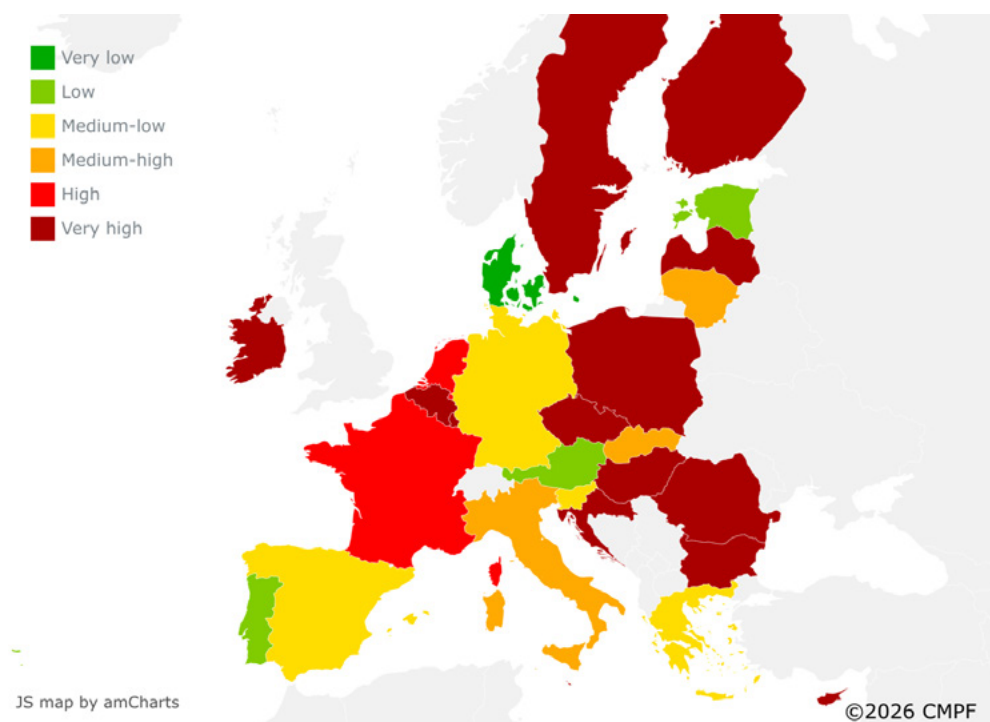


Figure 4.b. Sub indicator Distribution of state advertising. Geographical risk representation (EU27)

in the European Union, particularly if transparency rules and oversight bodies fail to adequately address the risks emerging from these opaque online portals.

²³ At the country level, major fragmentation is detected when it comes to addressing the wide range of threats to the digital environment. This may involve different institutions and bodies, at different levels, and with different tasks. The designation of a competent authority, or a clear repartition of tasks between different authorities (e.g. a Data Protection Authority, and a National Media Authority) in light of the new provisions under the TTPA, is paramount.

²⁴ As already underlined in the MPM 2025, these procedures may involve requirements such as competitive bidding, justification for direct allocations, and transparency in budget use, yet they generally lack safeguards aimed at ensuring media fairness or pluralism. Typically initiated by public bodies—such as ministries, municipalities, or state agencies—these processes can take various forms, including open tenders, simplified quotation requests, or direct-award exceptions, depending on the contract’s value. Decisions are commonly made based on factors like cost, audience reach, delivery capability, or technical proficiency, while considerations related to editorial independence or media pluralism are seldom treated as important selection criteria.

sub indicator in question, reflecting regulatory challenges, biased distribution, and poor transparency, contributing to increased levels of politicisation. As emerges clearly from several years of MPM implementation, the main issues observed pertain to a generalised lack of provisions addressing the online domain, the untransparent distribution of public advertising money through state-owned companies, and absence of detailed reporting requirements for public bodies. On top of this, effective monitoring from a competent regulatory authority is reported in very few Member States. As indicated by the geographical risk representation below, more than two-thirds of Member States fall under higher risk categories.

A first overview of regulatory developments under Art.25 EMFA

Against the risks identified in the previous section, EMFA Art. 25 has been provided with relevant provisions aiming to reduce State ads-enabled political influence and market distortion by promoting fairness, media pluralism, and public oversight. Accordingly, the allocation of state advertising shall now be conducted following principles of transparency, objectivity, proportionality, and non-discrimination. Public authorities are required to apply open and fair procedures, with all criteria publicly accessible in advance through user-friendly electronic means. The provision also encourages Member States to distribute state advertising expenditure across a broad plurality of media outlets, taking into account national and local media market characteristics, while remaining consistent with EU public procurement and state aid rules. Furthermore, the article imposes strong transparency obligations on public authorities, which must annually disclose information on state advertising expenditures, including the recipients, associated business groups, and the amounts allocated to each provider. Independent national regulatory authorities are tasked with monitoring and annually reporting on the distribution of such expenditure, ensuring accountability and assessing whether allocation prac-

tices comply with the established criteria (European Union, 2024).

Following the entry into force of these provisions in August 2025, to comply some Member States have adopted relevant provisions. In Greece, new transparency obligations for both public bodies and media providers were introduced through the adoption of Law 5253/2025. The NCRTV/ESR has been designated as the competent authority for monitoring (Papadopoulou & Angelou, 2026, p.33). Similarly, in Slovakia, Act No. 264/2022 Coll. on Media Services (adopted in 2025), introduced both transparency obligations and criteria for non-discrimination. More specifically, public authorities would be required to disclose in advance the intention to allocate money for state ads, while ensuring that relevant data are accessible to the public. Provisions in terms of plurality of distribution have also been introduced (Urbanikova, 2026, p.31).

In other Member States, legislative proposals are still unfolding. In Luxembourg, Draft Bill 8625 designated ALIM (evolving from ALIA) as the central national regulatory authority. Accordingly, ALIM ‘will assess compliance, publish public reports, and request further details from authorities to verify completeness’. No sanction powers are, however, attributed to ALIM (Kies & Lukasik, 2026, p.41). In Malta, the legal notice published by the government in August 2025 provided for the establishment of an ‘Office for Advertising and the Media’. This body ‘shall perform such functions relating to the implementation of the EMFA Regulation as may be assigned to it in this order or by further order by the Prime Minister’ (Mallia et al., 2026, p.42). In Poland, a new media bill introduces transparency measures for both state advertisers and media providers, while obliging state companies or state-funded entities to introduce a clear bylaw explaining procedures of selection of the media; criteria of selection and rules of distribution of advertising expenditures (Klimkiewicz, 2026, p.31). In The Czech Republic, the newly proposed Act on Media Services, would require ‘public offices, ministries, and other public

administration bodies to submit annual reports on their media advertising expenditure, including spending on online platforms, to the Czech Broadcasting Council. A public database containing this information would then be made available on the Council's website' (Štetka et al., 2026, p.26).

Major persisting issues with state ads allocation

Notwithstanding these improvements, the practical situation remains highly concerning. First, transparency is severely limited in most countries. For example, in Greece, the data filled in the online platform for public spending is reportedly incomplete and not easily retrievable (Papadopoulou & Angelou, 2026, p.33). In France, the Government Information Service (Service d'information du gouvernement - SIG) 'only provides a summary of all the governmental ad campaigns ran the past year' (Ouakrat & Lupovici 2026, p.33). In the Czech Republic, effective oversight is 'nearly impossible' (Berger, 2026, as cited in Štetka et al., 2026, p.26). Second, evidence continues to be reported in terms of discriminatory practices. In Spain, reports at both national and regional levels 'point to cases of political interference in its distribution' (Suau et al., 2026, p.34). Some slight improvement is instead reported in Poland, where state advertising expenses by state owned or controlled companies seem less unbalanced compared to the PiS era (Klimkiewicz, 2026, p.31), and in Germany, where some public bodies have started to publish state ad-related information (Kalbhenn, 2026, p.33).

Biased allocation is also highly problematic at the local level, where institutional communication is often more openly connected to political or politicised ownership structures associated with so-called municipal media. In many instances, these outlets are owned, controlled, or closely aligned with local political actors, enabling them to channel significant financial resources towards affiliated media organisations. As already reported in the MPM 2025, this pattern has been identified in several countries

recently, including Luxembourg, Poland, the Czech Republic, Croatia, Slovenia, and Slovakia (Bleyer-Simon et al., 2025, p.75). Finally, major issues continue to be detected in the online domain, including on online platforms. While major platforms provide ad libraries where information on institutional and social issue advertising can be retrieved (political advertising has been totally banned following the TTPA's full application), this does not equate to proactive transparency on the side of public bodies, which really would make expenditure accountable to the public.

4.2.3. Focus 3 - Reshaping European public service media systems under EMFA Art. 5

Following the entry into force of the EMFA in August 2025, Member States will be required to safeguard the editorial and functional independence of public service media against the risk of infringement proceedings. This will entail ensuring that appointments and dismissals of senior management are conducted through transparent, open, effective and non-discriminatory procedures, while also guaranteeing adequate and stable funding arrangements that do not compromise editorial independence (European Union, 2024). The situation revealed by the MPM analysis is ambivalent, in this regard. On the one hand, the 2026 implementation shows that many countries have undertaken reform processes to align with the new Regulation, with the nature of these reforms reflecting the institutional, regulatory, and socio-political contexts and traditions of Member States. On the other hand, the practical situation remains problematic, with the indicator **Independence of public service media** signalling an increase in the aggregate level of risk, mainly driven by the sub indicator *PSM governance*. Notably, cases are reported that the way in which reforms are unfolding may actually increase politicisation, instead of reducing it. In some countries, concerns are backed not only by major stakeholders working in the media sector but are aggravated by

the same public statements of political actors that proposed reforms.

Positive and negative approaches to governance and funding in public service media

The MPM analysis shows that stronger governance outcomes are often associated with institutional arrangements that diffuse decision-making power across multiple actors and procedures. In countries such as Sweden, Finland, the Netherlands, and, following recent reforms, Slovenia, governance structures incorporate actors such as universities, journalist associations, and civil society organisations into appointment processes, helping to broaden representation and reduce dependence on political bargaining. The analysis also identifies several procedural features that contribute positively to governance quality, including open calls for applications, transparent timelines, public hearings, and merit-based evaluation criteria. Other safeguards highlighted by the MPM include staggered mandates, which limit the impact of electoral cycles on institutional continuity, and stricter conflict-of-interest rules. Vice versa, concerns most often emerge where governments exercise direct or indirect control over the appointment of executives, where merit-based and publicly accessible selection procedures are absent, and where the removal of staggered mandates allow abrupt political reshaping of governance structures. Weak conflict-of-interest rules and broader institutional restructurings aimed at replacing leadership further contribute to the risk of political capture and instability within public service media systems (Bleyer-Simon et al., 2025, pp.77-79).

The MPM analysis underlines that the effectiveness of public service media funding depends not only on the amount of resources available, but also on the degree of stability, predictability, and procedural safeguards embedded in financing arrangements. Across the countries assessed, funding systems that reduce dependence on ad hoc governmental decisions tend to provide stronger conditions for editorial and operational autonomy. Licence fee

models are often associated with these advantages because they can offer a more regular and predictable revenue stream, even though several countries are currently debating reforms due to concerns related to collection, public legitimacy, and adaptation to digital consumption patterns. The analysis also highlights the importance of linking financial reforms to broader institutional safeguards. The findings suggest that funding arrangements are more resilient when they are based on transparent legal frameworks, clear allocation procedures, and mechanisms that allow public service media to operate with continuity and plan over the long term, rather than being exposed to recurrent political or budgetary uncertainty. In fact, funding arrangements create higher risks when they depend heavily on discretionary state budget allocations or politically determined financing decisions. Systems lacking stable, predictable, and legally grounded funding mechanisms are more vulnerable to political pressure, arbitrary reductions, delays, and uncertainty, undermining both editorial independence and long-term planning capacity. Even licence fee systems may generate risks where their level, structure, or reform process becomes subject to recurring political intervention. Additional concerns arise where allocation procedures are insufficiently transparent, where funding criteria are unclear or not linked to objective performance standards, and where public service media organisations remain exposed to short-term governmental or parliamentary bargaining over financial resources (Bleyer-Simon et al., 2025, pp.79-80).

Recent developments with governance and funding structures of public service media in Europe

Developments observed over the 2025 analysis return a complex situation. While several Member States have embarked on reform processes following the EMFA full applicability, the findings reveal increased risks as well as indications that some legislative proposals are far from the standard required by the Regulation.

A first concerning case is the draft law being currently discussed in Lithuania. The amendments proposed in the draft foresee a reduction in the threshold necessary for the dismissal of the LRT director general (dismissal would now only require the backing of seven of the twelve members of the council, instead of eight). The dismissal procedure of the director would also be simplified through the removal of a crucial provision that requires the violation of public interest provisions for the dismissal to be possible. Meanwhile, the Lithuanian parliament froze the 2026-2028 budget allocation to Lithuanian national radio and television at the 2025 level, sparking further debate (Jastrankis, 2026, pp.5, 7). These circumstances provoked a reaction from the European Parliament, which adopted a resolution concerning the potential violation of EMFA²⁵ and from the Council of Europe's Venice Commission.²⁶

A worrisome situation is also unfolding in the Czech Republic, following the new government's announcement to change the funding mechanism of Czech Television (ČT) and Czech Radio (ČRo). Specifically, the proposed law would abolish the current legal system to replace the licence fee with direct state funding, to be set at a fixed level and adjusted annually for inflation, capped at five percent.²⁷ In parallel, an amendment was issued to exempt a significant number of households (the 75+ age group and companies with less than 50 employees) from paying licence fees as of late 2026 (EFJ, 2026; IFJ, 2026). The proposal presents severe instances of risk. Firstly, it significantly reduces funding resources. Under the plan, ČT's annual funding would decrease 'from approximately CZK 6.7 billion (€274 million) to CZK 5.7 billion (€233 million), while ČRo's funding would be

reduced from CZK 2.5 billion (€102 million) to just over CZK 2 billion (€82 million)' (MAPMF, 2026). Secondly, it generates strong legal uncertainty. Continuity of rights, obligations, property and liabilities of both institutions would not be ensured, while the definition of independence in the draft is reportedly confusing. Space would also be open for indirect influence from political, commercial, and donor sources, while the continued validity of the Codes, Statutes and Memorandums remains unclear. Thirdly, the proposal is reportedly linked to the dissatisfaction of newly-elected governing leaders with PSM news coverage (Bastlová, 2025, as quoted in Štetka et al., 2026, p.27), suggesting that the main rationale behind the legal change would be the redirection of PSM editorial output along political lines (IPI, 2026). Last, but not least, the proposed change would reverse the long advocated and expert-backed legal development that entered into force in 2025. This development increased fees while indexing any further increase to the inflation rate (Štetka et al., 2025, p.23). The extreme rapidity with which the process is unfolding, coupled with the absence of legislative intent, and any public or expert debate (IFJ, 2026), is fuelling additional concern. Relevant stakeholders are currently voicing against the reform (IPI, 2026, IFJ, 2026, EFJ, 2026), claiming that it is arguably in violation of the provisions set out under EMFA Art. 5(3) and potentially those provided under other sub articles. A letter was recently sent on 11 May from IFJ President Zuliana Lainez and General Secretary Anthony Bellanger to Prime Minister Andrej Babiš 'demanding [from] him the immediate withdrawal of the law and the parliamentary amendment proposed by the coalition parties'.²⁸

25 European Parliament. (2026). *Joint motion for a resolution on the attempted takeover of Lithuania's public broadcaster and the threat to democracy in Lithuania* (RC-10-2026-0070). https://www.europarl.europa.eu/doceo/document/RC-10-2026-0070_EN.html

26 European Commission for Democracy through Law (Venice Commission). (2026). *Opinion on draft and adopted amendments to the Law on the Lithuanian National Radio and Television* (CDL-AD(2026)001). Council of Europe. <https://www.coe.int/en/web/venice-commission/-/cdl-ad-2026-001-e>

27 See: European Federation of Journalists. (2026, April 22). *Czech Republic: Public media funding bill raises concerns over compatibility with EMFA*. <https://europeanjournalists.org/blog/2026/04/22/czech-republic-public-media-funding-bill-raises-concerns-over-compatibility-with-emfa/>

28 See International Federation of Journalists. (2026, May 11). *Centenary Congress: IFJ adopts motion to protect public service*

Attention should also be paid to recent developments to the Slovak PSM system. The governance framework of the Slovak Television and Radio (STVR) was revised in 2024 under Act No. 157/2024 Coll. following the dissolution of Radio and Television of Slovakia (RTS) and the concomitant dismissal of its Board and Director. At that time, and even before, several stakeholders spoke out against the reform, claiming that it was steered towards increasing governmental control over the PSM. Such an argument was backed not only by legal analysis and media reports, but also by public statements by governmental actors. After the restructuring, several journalists left the broadcaster citing increased editorial interference and restrictions on guests and topics (European Centre for Press and Media Freedom, 2025b, 2025c; Hanák, 2025, as cited in Urbanikova, 2026, p.32). The appointment of a new director-general in a closed-door session in 2025 reinforced these concerns (European Centre for Press and Media Freedom, 2025a, as cited in Urbanikova, 2026, p.32). Finally, in February 2026, the Constitutional Court of the Slovak Republic made an inquiry at the Court of Justice of the European Union on the compliance of the law establishing STVR with EMFA, also in relation to governance procedures (Constitutional Court, 2026, as cited in Urbanikova, 2026, p.32).

4.3 Recommendations for Political Independence

As evidenced, the **Political Independence** area highlights a vast range of problematic dynamics affecting the European media sphere. This year, increased politicisation of media ownership either through direct or indirect means had been observed, enabled by partial or inefficient regulatory safe-

guards. Self-regulatory provisions are fragmented and, where available, only partially effective. Concerning patterns with political advertising continue, coupled with instances of coordinated inauthentic behaviour. State advertising continues to be allocated in an unfair and untransparent manner. Implementation under Art.25 EMFA is slow-paced. The independence of public service media is not secured in many countries, with concerning processes of reform unfolding in some Member States.

EU institutions should:

- Monitor implementation under Article 6(3) EMFA and EC Rec. (EU) 2022/1634.
- Monitor the compliance of the Member States under Art.5 EMFA to ensure independent governance and the funding mechanisms of public service media.
- Monitor the compliance of the Member States under Art.25 EMFA, to ensure fair allocation and reporting from public bodies.
- Monitor compliance with the TTPA.

Member States and national regulatory authorities should:

- Introduce provisions to ensure that the appointment and dismissal of editors-in-chief in commercial media is not based on political or commercial considerations.
- Set up comprehensive safeguards preventing political capture through ownership means, including for the digital media sphere. Regulate ownership and control by municipalities, for example, by excluding municipal outlets from the possibility of registering as a publication.
- Secure governance and funding structures

media in the Czech Republic. <https://www.ifj.org/media-centre/news/detail/category/centenary-congress-2026/article/centenary-congress-ifj-adopts-motion-to-protect-public-service-media-the-czech-republic> and International Federation of Journalists. (2026). *Motion to protect public service media in the Czech Republic.* <https://www.ifj.org/fileadmin/20260511115321708.pdf>

of state-owned news agencies from political bargaining.

- Reform governance and funding structures of public service media in such a way that these comply with the standards set out under EMFA Art.5.
- Consider introducing provisions conditioning the allocation of state resources to the availability of comprehensive internal self-regulatory measures.
- Public bodies shall disclose in detail State advertising allocation, as provided under Art.25 EMFA.
- Ensure the proper implementation and enforcement of the TTPA.
- Data Protection Authorities should act proactively, especially given the new obligations under the TTPA.
- Ensure that regulation for balanced/fair political communication in election times is comprehensive and updated to the digital era and guarantee that regulation does not impede smaller parties and candidates from getting heard.

The media industry should:

- Participate in, and abide to, collective and/or cross-sectorial self-regulation.
- Introduce comprehensive internal codes with detailed provisions in terms of editorial independence. They should also set up relevant internal bodies (e.g. editorial committees) acting as a filter between newsroom and management.
- In Member States where political advertising is prohibited, they should allocate airtime following fair and objective criteria.
- Ensure that political advertising is never disguised as editorial content.

- Make public insightful data on ownership and management structures.

Journalists' associations should:

- Work to ensure that collective and/or cross-sectorial self-regulation is provided with comprehensive and detailed safeguards in terms of editorial independence, with a focus on independence from political sources.
- Work for the setting up or the strengthening of self-regulatory bodies (e.g. media councils) tasked with the monitoring of such provisions.
- Advocate for the introduction of the provisions set under EC Rec. (EU) 2022/1634.
- Advocate for the introduction of provisions to ensure that the appointment and dismissal of editors-in-chief in commercial media is not based on political or commercial considerations.

Very Large Online Platforms should:

- Ensure that the provisions under the TTPA are duly implemented. Where a ban on political advertising has been adopted, ensure this is working effectively.

Chapter 5
**Social
Inclusiveness**

5.1. In-depth results

The Social Inclusiveness area focuses on universal, inclusive and safe access to the media, with emphasis on specific groups such as cultural and linguistic minorities, local and regional communities, women and people with disabilities. Media Literacy is also taken into account as it is an essential condition to safely access the media.

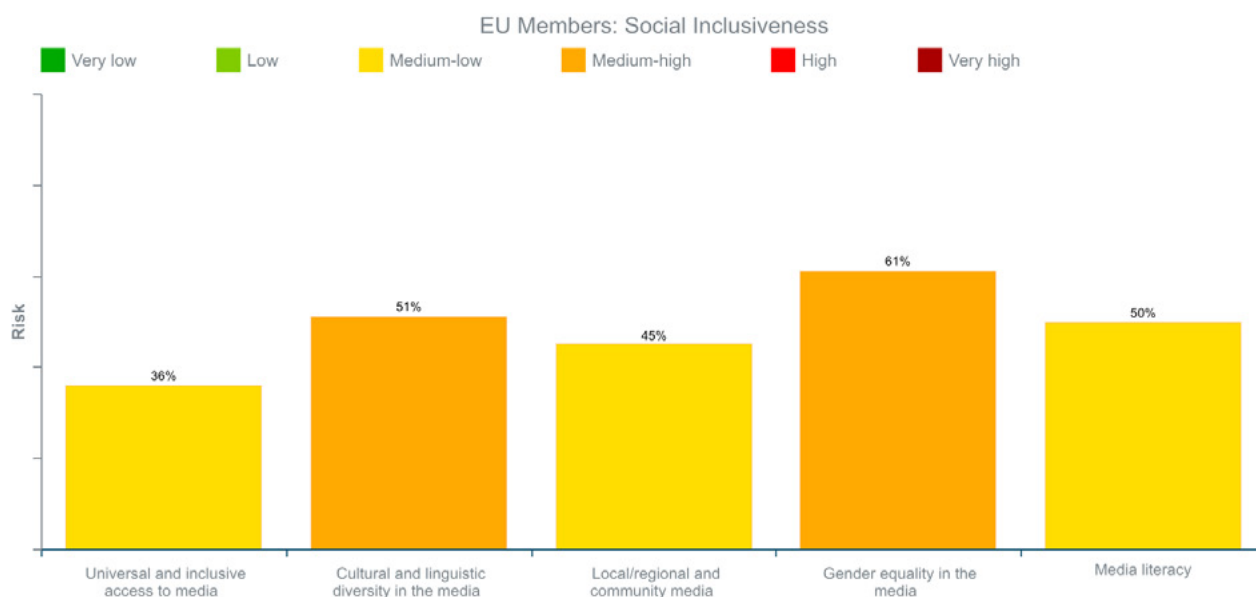


Figure 5.a. Social Inclusiveness area - averages per indicator

In line with the last edition of the MPM, all the indicators used to assess **Social Inclusiveness** are within the medium-low and the medium-high risk bands. None of the indicators have changed risk bands in 2025. However, this average score per indicator hides some important differences between countries.

While Scandinavian countries, Benelux and Germany perform well in the field of **Social Inclusiveness**, progress tends to be slower in Eastern and Southern EU Member States. Greece and Cyprus are the only EU27 countries classified as high risk in this field, indicating particularly serious challeng-

es. As Papadopoulou & Angelou (2026) point out, the main problem lies in the enforcement of existing legislation that remains inconsistent, fragmented, and only partially effective in addressing issues related to cultural and linguistic diversity, local, regional and community media news provision, and gender equality in the media. Consequently, vulnerable and marginalised groups continue to encounter barriers to access, visibility, participation, and equitable representation within the media landscape. In Cyprus, the absence of a comprehensive strategic approach further aggravates social inclusiveness issues (Christophorou & Karides, 2026).

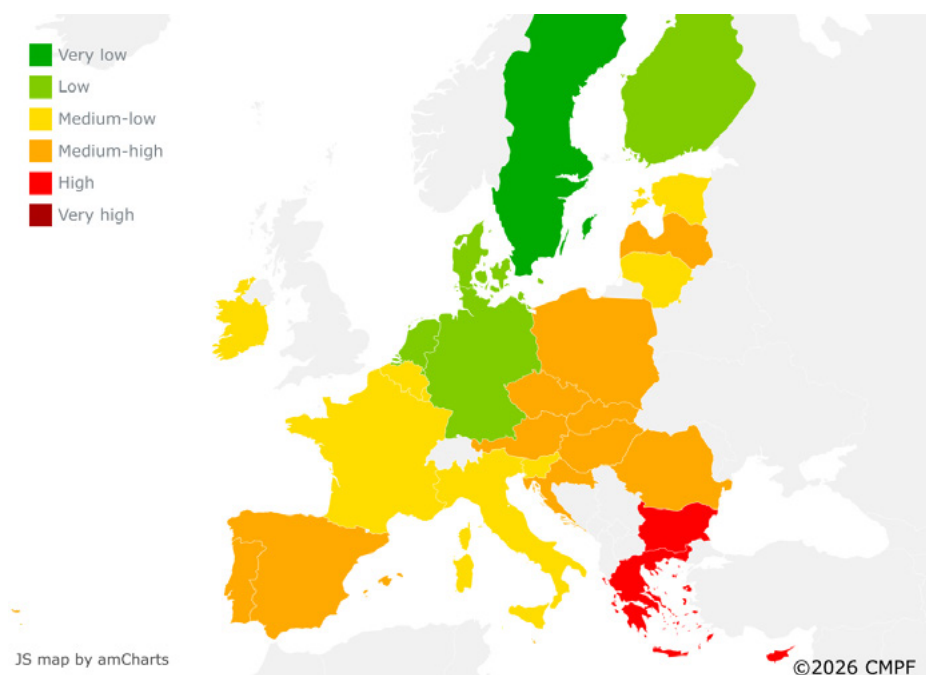


Figure 5.b. Social Inclusiveness area - Map of risks for country

UNIVERSAL AND INCLUSIVE ACCESS TO MEDIA MEDIUM - LOW RISK

The indicator on the Universal and inclusive access to media assesses the universality of traditional TV and radio network coverage, broadband and mobile coverage, and media accessibility for people with disabilities.

The average score for the **Universal and inclusive access to the media** indicator is medium-low risk, however this score is on the cusp of entering the low-risk band. While universal access to public service media and internet covers almost the entirety of EU territory, the main risk for this indicator lies in media accessibility for people with disabilities. The majority of Member States have made visible efforts to meet the requirements imposed by the Accessibility Directive and the Audiovisual Media Service Directive, with solid legal frameworks and national regulatory authorities monitoring the progress of media service providers. Italy is a good example of a country having made massive efforts to improve media accessibility for people with disabilities. According to Vigevani et al. (2026), media accessibility

has advanced significantly following the 2023–2028 RAI Service Contract and AGCOM Resolution no. 291/25/CONS. For audiences with hearing impairments, RAI now offers subtitles for more than 90% of general programming, while the use of AI-driven technologies has made it possible to extend real-time subtitling to live content on RaiPlay. Italian Sign Language (LIS) provision has also been expanded, covering not only news broadcasts but major institutional events as well. For viewers with visual impairments, audio description has become a mandatory and systematic feature in fiction productions and prime-time films. According to the most recent data, in 2024 RAI aired approximately 1,830 hours of audio-described programming, equivalent to about 35 hours per week (Vigevani et al., 2026, citing AGCOM, 2025i, p. 1). Besides, AGCOM has, for the first time, required major private broadcasters such as Mediaset and La7 to submit three-year Accessibility Action Plans (Vigevani et al., 2026, citing AGCOM, 2025i). These plans are subject to monitoring and may incur administrative penalties of up to €40,000 in cases of non-compliance with established quotas (Article 24 of Legislative Decree no. 82 of 27 May 2022), thereby strengthening consistent protection of the right to information for all citizens.

CULTURAL AND LINGUISTIC DIVERSITY IN THE MEDIA

MEDIUM - HIGH RISK

This indicator focuses on the inclusive and safe representation of minorities on public service media and private broadcasters. Existing protection against hate speech is assessed in this indicator, as a precondition to a safe media environment.

Ensuring cultural and linguistic diversity in the media remains a source of risk in most of the EU Member States. The most pressing issue is maintaining the media as a safe space and guaranteeing optimal protection against hate speech. Although most of the Member States have a legal framework to combat hate speech, as well as some mechanisms to report it, this tends to remain relatively insufficient. For example, France scores high risk in the sub indicator of *Protection against hate speech*. Existing strategy and legal protection seem limited, to the extent that in 2025 the government reiterated that the DSA obliges platforms to implement

measures aimed at limiting hate speech (Ouakrat & Lupovici, 2026, citing *Le Figaro*, 2025). The National regulatory authority, ARCOM, has revived the online hate speech observatory to find solutions to this issue (Ouakrat & Lupovici, 2026, citing ARCOM, 2026). Furthermore, the role of online intermediaries in combating hate speech remains largely inadequate across the EU27, particularly regarding the transparency of their content moderation and removal practices, as clear and transparent data on these processes is often lacking. Bulgaria presents the highest level of risk (very high risk) within this sub indicator. In September 2025, the European Court of Human Rights ruled in *Ilareva and Others v. Bulgaria* that the state had violated Article 8 in conjunction with Article 14 of the ECHR due to its ineffective investigation into death threats, incitement to violence, and hate speech posted on Facebook against human rights defenders working with migrants and minorities (Spasov et al., 2026, citing ECtHR, 2025c).

In most EU Member States, the fight against hate speech is often fragmented. As per Figure 5.c, Lithuania is the only country that scores a low risk regarding the existence

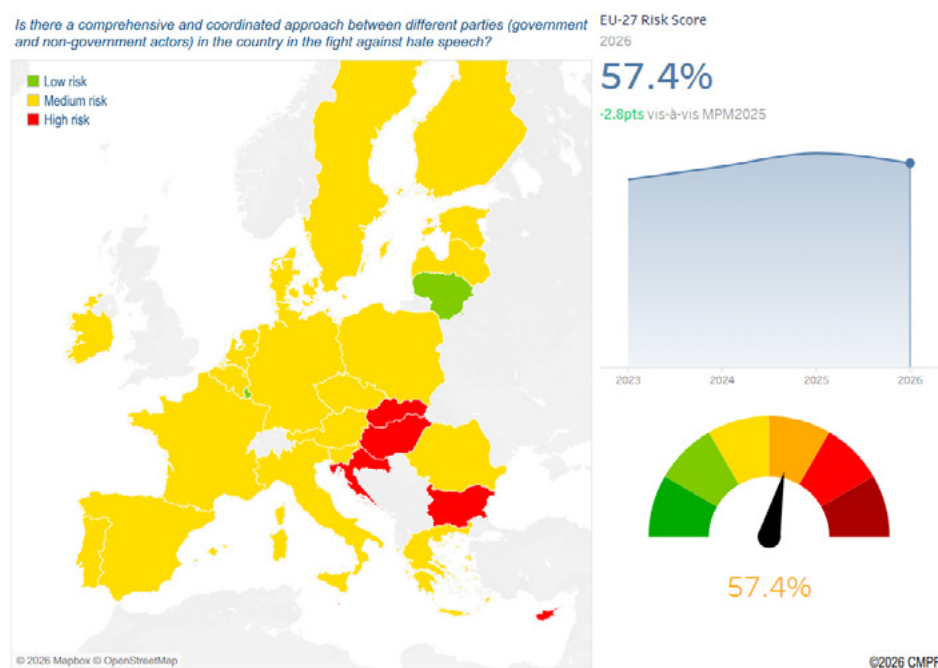


Figure 5.c. Variable 171 - Is there a comprehensive and coordinated approach between different parties (government and non-governmental actors) in the fight against hate speech in your country - Map of risks for country

of a coordinated strategy to fight hate speech. According to Jastramskis (2025), government institutions and non-governmental organisations signed a memorandum in 2024, the purpose of which was to ensure a coordinated, comprehensive, and effective response of state institutions, state bodies and non-governmental organisations to hate crimes and hate speech in Lithuania (Memorandumas dėl atsako į neapykantos kalbą ir neapykantos nusikaltimus stiprinimo, 2024 cited in Jastramskis, 2025). To increase the effectiveness of the fight against hate crimes and hate speech in Lithuania, at the end of 2024 the minister of internal affairs (Order Nr. 1V-162, 2024) formed a working group comprising representatives of government institutions and non-governmental organisations. This shows a coordinated approach between different parties in the fight against hate speech. As a result of the working group, the cabinet of ministers approved a comprehensive action plan to combat antisemitism, xenophobia and incitement to discord in all its forms, and to foster Jewish life.¹

LOCAL/REGIONAL AND COMMUNITY MEDIA MEDIUM - LOW RISK

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

The medium-low risk associated with **Local/regional and community media** shows a contrasting panorama. While Public Service Media tend to fulfil the critical needs of information in most countries (see Focus 2 below), the situation is more complicated regarding commercial media. One main risk factor emerges concerning local and regional commercial media and their sustainability. Most EU Member States score within the high-risk band, while only one country scores within the low-risk band: Sweden (Figure 5.d.). According to Färdigh (2026), over the past few years Sweden has adopted media

support policies designed to shift funding for editorial production from large national actors towards local and regional news providers. These policies are implemented through several targeted schemes administered by the Swedish Media Authority under the Mediestödsförordningen (SFS 2018:2053), the Presstödsförordningen (SFS 1990:524), and more recently, the Lag (SFS 2023:664) om mediestöd. These schemes include operational support, transitional support, and dedicated funding for local journalism in areas with weak or insufficient news coverage—often referred to as “news deserts”. They are technology-neutral, making them available to both print and digital media, and are intended to strengthen the long-term presence of journalism, promote content diversity, and improve geographical coverage. Support for local journalism can cover up to 75 percent of eligible editorial costs, provided that applicants finance the remaining portion themselves. If the funding has not prevented a steady rise in “news deserts”, it has however slowed down the trend (Färdigh, 2026, citing Institutet för Mediestudier, 2025). In order to maximise the effectiveness of the fund, policy debates are currently considering addressing so-called “thematic deserts”, as smaller local newsrooms often lack the capacity to undertake more advanced investigative reporting.

Lithuania has also prioritised support for private commercial local and regional media. As Jastramskis (2026, citing Media Support Fund, 2025a, 2025b, 2026) notes, the Media Support Fund now allocates more resources to regional and local media than to any other media sector. In 2025, 65 local and regional media outlets received subsidies of up to €40,000, while 70 regional and local media content projects were funded through dedicated schemes. In addition to project-based funding, media organisations can also receive operational support for salaries, technical infrastructure, digitalisation, and other essential costs, based on transparent criteria such as the number of editorial staff and other clearly defined indicators.

¹ Government of the Republic of Lithuania (2026, Jan. 21). *Government adopts action plan to combat antisemitism and xenophobia*. <https://lrv.lt/en/news/government-adopts-action-plan-to-combat-antisemitism-and-xenophobia-al9r/>

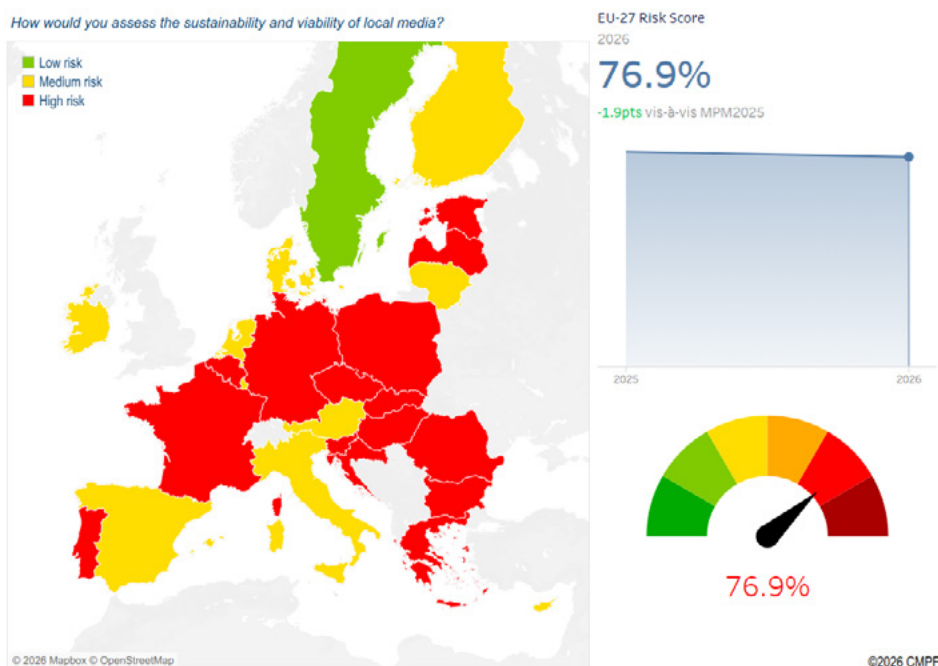


Figure 5.d. Variable 175 - How would you assess the sustainability and viability of local media?
 - Map of risks for country

This is in line with what has been implemented in Denmark since 2023. According to Simonsen (2025; 2026), the Danish Media Agreement 2023–2026 introduced targeted support for local and regional journalism through the establishment of a centre, *Gravercenteret - Danmarks Center for Undersøgende Journalistik*, dedicated to strengthening investigative journalism at the local level. The centre is funded with an annual public allocation of EUR 710,000 (DKK 5.3 million) during the 2023–2026 period.

GENDER EQUALITY IN THE MEDIA

MEDIUM - HIGH RISK

The indicator Gender equality in the media assesses gender parity in media production and, more specifically, in management-level positions, as well as the representation of women in political and news content, both in public service media and private companies, at the national and local level.

Since the initial implementation of the MPM, Gender equality in the media has consistently been

identified as a key risk indicator (see Figure 1.d), reflecting both quantitative and qualitative gender imbalances particularly in management positions and in women’s visibility within media content (Palmer & Urbániková, 2025). The representation of women in the media remains the most significant factor of risk in all the EU Member States, with none of the countries scoring either within the low- or very low risk bands (See figure 5.e).

In the medium-low risk band, Ireland accounts for the country whose risk score has decreased the most over the successive implementations of the MPM. According to Flynn (2026, citing Wheatley, 2026), women’s visibility in political and economic news has increased markedly over the past two decades, rising by approximately 15 percentage points in each area. However, the gap is still significant, and equal representation has not yet been reached. In Irish media, women account for 36% of “expert or commentator” roles, compared to 20% in 2005. Women represent only 28% of spokespeople, although this figure is double the proportion recorded in 2005 (Flynn, 2026, citing Wheatley, 2026). Besides this, the underrepresentation of women in positions of

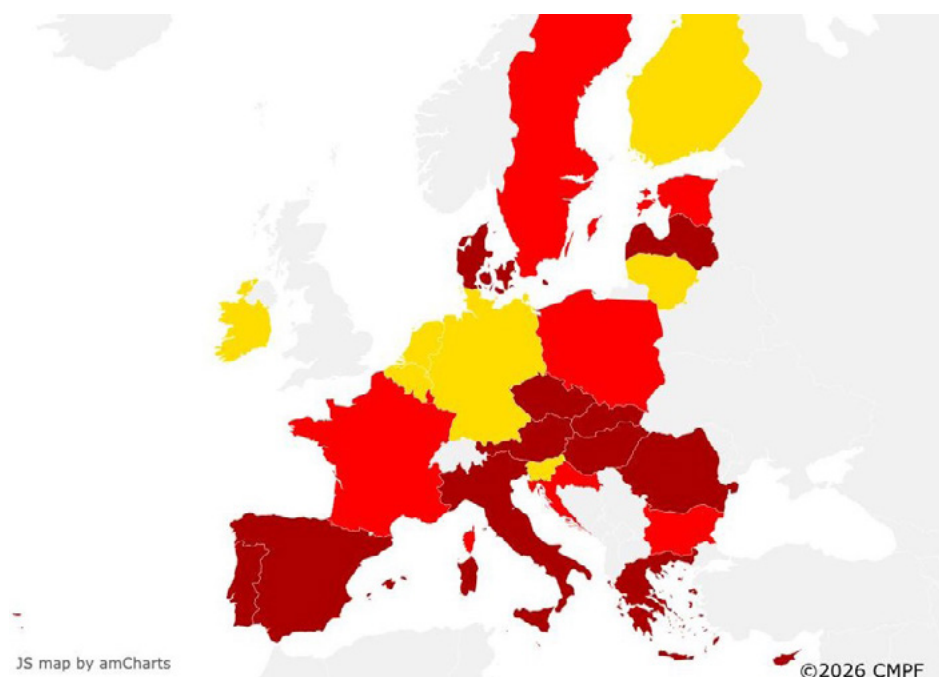


Figure 5.e. Sub-indicator representation of women in the media - Map of risks for country

power has persisted, alongside an ongoing tendency to describe women in terms of their age and physical appearance.

The persistence of high risk associated with the representation of women in the media is often linked to the absence of monitoring evaluation and learning mechanisms. To remedy this problem, Croatian Ombudswoman for Gender Equality oversees media adherence through complaints processes, thematic reviews, and public interventions. The Ombudswoman also issues warnings and recommendations when required. However, the efficiency of the Ombudswoman remains limited in practice. According to Bilic (2026, citing Ombudsperson for Gender Equality, 2025), the presence of sexist framing, objectification, and sensationalist coverage, particularly in reporting on gender equality and gender-based violence is still a problem in Croatia.

MEDIA LITERACY

MEDIUM - LOW RISK

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

Media literacy is associated with a medium-low risk, although this average sits on the cusp of the medium-high risk band. As per the previous implementation of the MPM, the risk is lowered by a handful of well-performing countries: the Scandinavian countries, the Netherlands and Estonia. Countries with low and very low risk scores typically combine strong, up-to-date media literacy policies with their effective implementation in mandatory school curricula. They also collaborate actively with civil society to support additional media literacy initiatives. This approach is reflected in the high levels of literacy observed among their populations.

If the scores associated with *Media literacy governance* frameworks are mapped separately (see figure 5.g), the map shows that, contrary to figure 5.f, the

majority of EU Member States have media literacy policies in place. However, most of these policies have limited impact due to limited and short project-based funding and may have limited impact on the overall media literacy skills of the population.

Even in the best performing countries, MPM researchers observed issues related to financing media literacy policies. In Estonia, Jõesaar (2026, p.38 citing Klesment, 2025) highlights that funding allocated to media literacy tends to be ‘fragmented and often project-based’, which contrasts with the ambi-

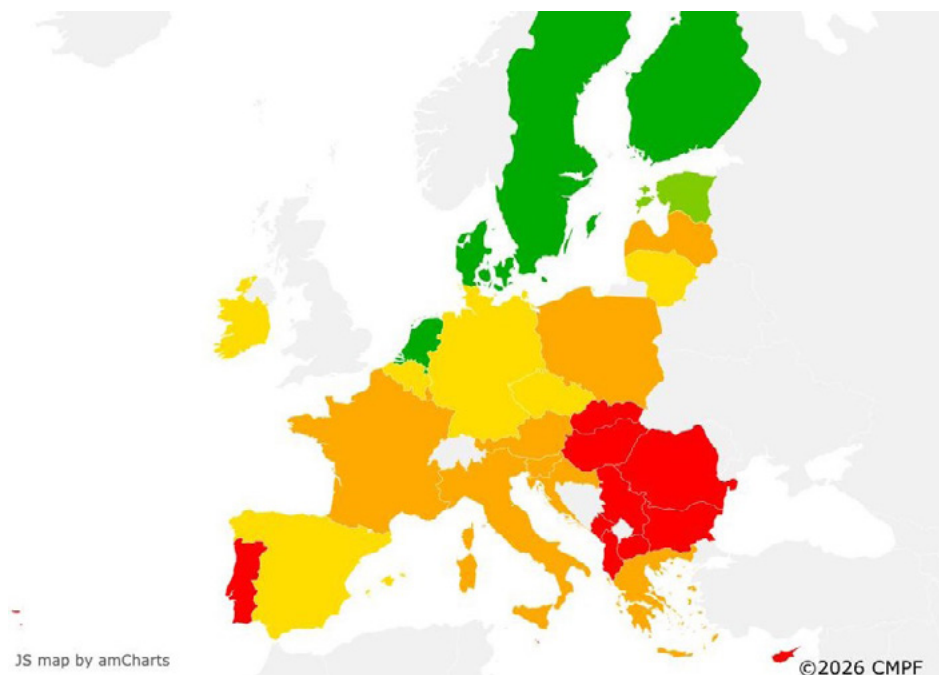


Figure 5.f. Media Literacy Indicator - Map of risks for country

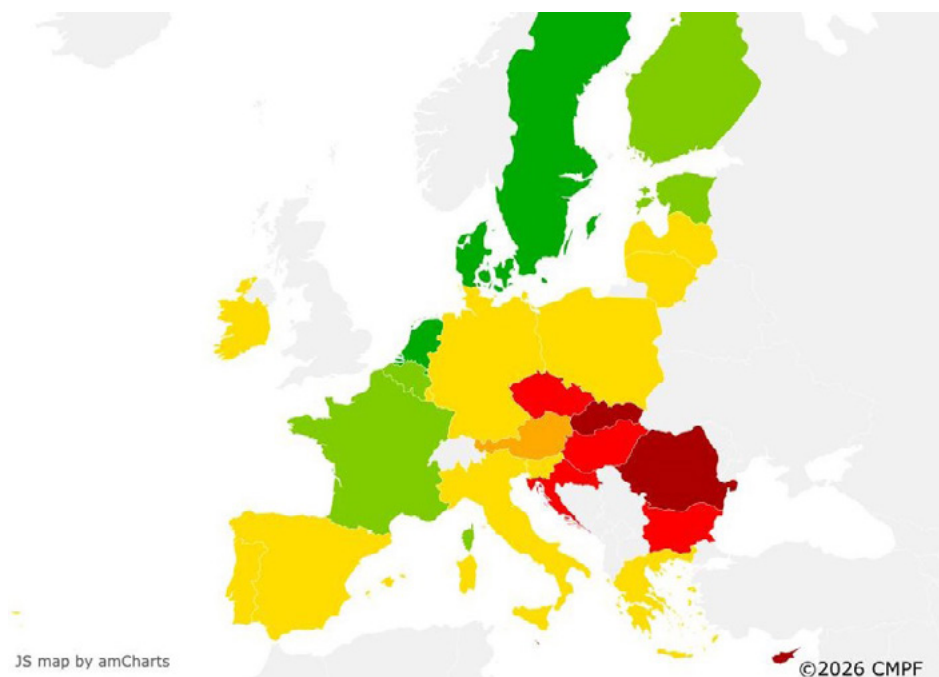


Figure 5.g. Sub-indicator Media literacy governance frameworks - Map of risks for country

tious projects described in the Media Literacy Action Plan. This plan includes five main pillars: curriculum integration, resource development, research and evaluation, awareness-raising, and network cooperation. Researchers observed a similar contradiction in Finland. Finland ranks second on the *Media Literacy Index 2026* and has a solid and comprehensive media literacy culture. The importance of media literacy has been reiterated in recent policy documents such as the Cultural Policy Report, approved by Finnish parliament in autumn 2025, the recent Security Strategy for Society published in 2025, and the Cyber Security Strategy 2024–2035. In 2025, the Finnish government even launched a consultation to update the National Media Literacy Policy for 2026. However, according to media literacy expert Kari Kivinen (cited in Palmer & Bleyer-Simon, 2026): ‘In political speeches, starting with the ones of the Finnish President, media literacy is presented as very important. However, the problem is funding. Funding is cut’. An example of funding cuts in Finland is the disappearance of the state funding for in-service training for teaching staff in 2025, which has directly weakened the opportunities for teachers already in the profession to update their media literacy skills. Such financial cuts are one of the main challenges to the implementation of a long-term and effective media literacy strategy, according to the new Media Literacy Policies 2025 (Cited in Palmer & Bleyer-Simon, 2026).

5.2. Three focuses on Social Inclusiveness

5.2.1. Focus 1 - “Appropriate prominence” : multiple interpretations in the absence of a legal definition

Over recent decades, Public Service Broadcasting has progressively transitioned to public service media, gradually diversifying and adapting its content offer to multiply its presence and to follow the technological and social evolutions of recent times (Bardoel

& Lowe, 2007). In this new environment, where online intermediaries function as key distributors of news content, the ability to locate and access media content of public value produced by PSM therefore became central to shaping freedom of expression and media diversity (Mazzoli, 2020, 2021). In order to ensure that PSM can still fulfil their public service mission and to stand out from other media producers, the European Commission inserted the notion of “appropriate prominence” into Article 7a of the revised Audiovisual Media Service Directive (AVMSD) 2018/1808/EU. Appropriate prominence aims at ‘ensuring the visibility and discoverability of audiovisual media providers that cater to a broad public and produce “general interest” content, such as news and current affairs’. (Mazzoli, 2023).

Although the transposition of Article 7a of the Audiovisual Media Service Directive (AVMSD) 2018/1808/EU was not mandatory, the Media Pluralism Monitor took into account these structural changes when measuring risks associated with the universal coverage of public service media. In the 2024 implementation of the MPM, a variable on the ‘appropriate prominence’ of the content of public interest produced by PSM was added to the sub-indicator on Universality of PSM coverage. Article 7a of the revised Audiovisual Media Service Directive (AVMSD) 2018/1808/EU states that ‘Member States may take measures to ensure the appropriate prominence of audiovisual media services of general interest’. Appropriate prominence being defined as ‘some kind of separation or highlighting of certain services’ (Capello, 2022). For the purpose of the MPM, ‘audiovisual media services of general interest’ were limited to public service media (PSM). Besides, taking into account the facultative character of Article 7a, the answering options were phrased in a way that focused on existing discussions on the topics rather than simply on identifying the transposition of the Directive with low risk. These options were: 1/ ‘The appropriate prominence of PSM content is never discussed’, 2/ ‘The notion of appropriate prominence of PSM content is dis-

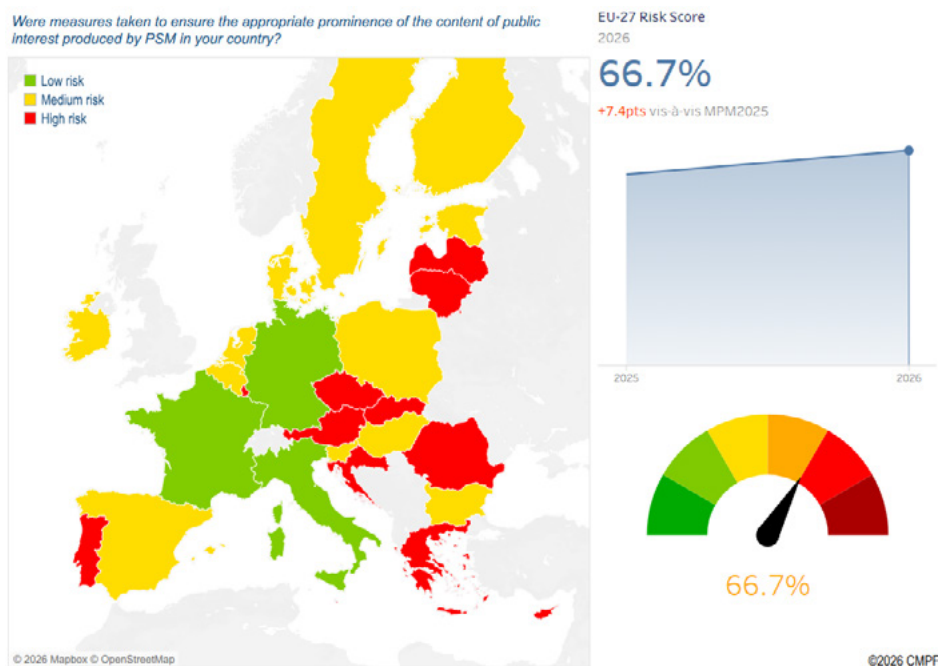


Figure 5.h. Variable 152 - Were measures taken to ensure the appropriate prominence of the content of public interest produced by PSM in your country? - Map of risks for country

cussed but few actions have been taken so far’, and 3/ ‘The notion of appropriate prominence of PSM content is consistently discussed and some measures have been taken to ensure an enhanced visibility of content produced by Public service media’.

So far, measures taken to foster the ‘appropriate prominence’ of public service media in EU Member States are limited. As illustrated by figure 5.h, most Member States have not yet considered discussing the matter, while only three countries score within the low-risk band, thanks to their explicit legal framework which allows them to apply appropriate prominence: France, Germany and Italy. Ten countries score within the medium risk band. Among them, the situation varies, between countries at an early stage of discussion such as Finland—where the ministry of transport and communications has recently launched a project to prepare a study on how the prominence of domestic media services could be improved in line with the Audiovisual Media Services Directive (Palmer & Bleyer-Simon, 2026)—, countries which have a must-carry law that contains notions of appropriate prominence (e.g. Hungary) and countries which have adopted a legal definition of appropriate prominence but are

lacking guidelines to apply these provisions, such as Belgium, Bulgaria, and Ireland.

Among the countries scoring within the low-risk band, the interpretation of appropriate prominence varies significantly, in the absence of a definition of appropriate prominence in Art 7a (see Table 5.1). While France and Italy adopted a positive approach—conserving the original ideal of “appropriate”, Germany takes a neutral approach, replacing the notion of appropriate by the notion of “absence of discrimination”. In terms of measure design, similar differences apply with very different specifications from one country to another, going from remote control design to user interfaces.

Table 5.1. Transposition of Article 7a - Audiovisual Media Service Directive (AVMSD) 2018/1808/EU

Country	Transposition of Art. 7a	What does the law say?
France	Article 20-7 of the 30 September 1986 law	<ul style="list-style-type: none"> • Definition of prominence: operators with a significant user base in France must ensure that services of general interest are appropriately visible on their interfaces. • Criteria to define prominence: “Visibilité appropriée” - Showcasing content on the homepage or home screen, in the recommendations to users; in search results initiated by the user; on remote control interfaces for devices that provide access to audiovisual communication services. • Who is eligible? Services of general interest are defined in Title III of the same law and include PSM and TV5 Monde. Besides, the French National regulatory authority ARCOM publishes yearly a list of operators that are considered as providing Services of general interest². • In case of breach? possibility of notification or fine for non-application.
Germany	Section 84 of the Interstate Media Treaty (Medienstaatsvertrag - MStV).	<ul style="list-style-type: none"> • Definition of prominence: (“Auffindbarkeit”) All offers must be detectable without discrimination by means of a search function. But prominence should be given to PSM and private programmes, which make a special contribution to the diversity of opinion. • Criteria to define prominence: not in the law: (8) The details of paragraphs 2 to 7 shall be governed by the national media institutions through common statutes and guidelines. • Who is eligible? PSM and private programmes, which make a special contribution to the diversity of opinion. Private programmes are determined by the Landesmedienanstalten for a period of three years each, according to the following criteria: share of news coverage of political and contemporary historical events, share of regional and local information; share of self-produced program contents, share of barrier-free offers, share of employees involved in the creation of the programme, quota of European works and share of offers for young target groups. • In case of breach? Not mentioned in the law.
Italy	AGCOM - Resolution n. 58/25/CONS – ‘Guidelines on the prominence of audiovisual and radio media services of general interest’.	<ul style="list-style-type: none"> • Definition of prominence - Services of General interest should be given prominence on all devices and user interfaces that allow access to these services, including Internet-connected televisions, decoders, and devices such as dongles and box sets. • Criteria to define prominence - 1/introduction of a dedicated “SIG rail” on the homepages of connected devices, featuring standardized icons for RAI and other national providers of public interest content, including an icon providing access to digital terrestrial television channels, icons for the five national SIG providers distributed online (RAI, RTI, La7, Sky Italia, and Warner Bros. Discovery Italia), a “Local TV” icon for accessing SIGs distributed locally, a “National” icon for accessing other national SIGs; a “Radio” icon for accessing radio SIGs distributed online and accessible on television screens. 2/”SIG basket” for automotive systems, ensuring that public interest audio remains accessible and high-profile • Who is eligible? PSM + 700 commercial services qualified as SIG, divided into approximately 320 audiovisual and 380 radio services (of which 80 national and 620 local; 320 in DVB-T, 370 in DAB+, 50 in DVB-S, 420 on IP). • In case of breach? None.

² ARCOM (n.d.). *Assurer une visibilité appropriée aux services d’intérêt général*. List for 2025 <https://www.arcom.fr/nous-connaître/nos-missions/assurer-la-regulation-des-acteurs-techniques-et-economiques/assurer-une-visibilite-appropriee-aux-services-dinteret-general>

Despite the fact that the policy objective of prominence rules was reiterated across Europe and acknowledged as an appropriate measure which could strengthen media pluralism (Cappello, 2022), the results of the MPM suggest that most of the EU Member States did not tackle the issue in the absence of obligation. When they did, the interpretation happened to diverge significantly and to be largely overlooked in practice. According to Garcia Leiva (2025), concerns are growing among relevant stakeholders about long term negative impacts if prominence rules are not widely translated into concrete measures soon. These concerns may even be reinforced in the context of AI playing a growing role in the discoverability and circulation of news content and exercising a higher degree of control over the public arena. (Jungherr & Schroeder, 2023). In this context, the review of the AVMSD, planned by the European Commission as part of the European Democracy Shield, is welcomed to define what an appropriate visibility and prominence of content of general interest by public service media is, and to offer an understanding of its modality.

5.2.2. Focus 2 - The role of PSM in local coverage and local public interest fulfilment

The growing body of research highlights the challenges facing local media, particularly in relation to economic sustainability, increasing pressures on editorial independence, and threats to journalists' safety at the local level (Trunkátová et al., 2023; Hayes & Lawless, 2021; Nygren & Nord, 2002). These problems are also associated with the phenomenon of news deserts (Abernathy, 2016), referring to areas where access to reliable and diverse information from independent news sources is limited or entirely absent (Verza et al., 2024). Ultimately, this situation deprives local communities of the relevant information necessary to make crucial decisions, often described as critical information needs (Friedland et al., 2012).

According to the latest Media Pluralism Monitor (MPM) results (Figure 5.i), only slightly fewer than a quarter of European Union countries are assessed as being at very low or low risk in this area, indicating persistent challenges in the provision of local, regional, and community media across the EU. Sweden is the only country classified as very low risk.

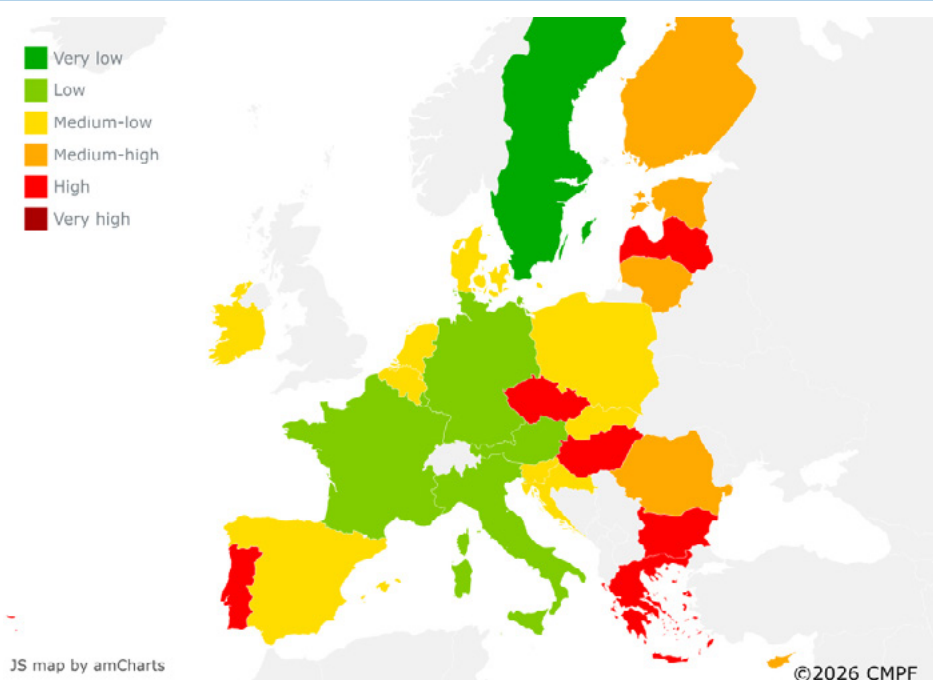


Figure 5.i. Map of risks per country for Local/Regional and community media indicator for EU26 (without Malta)

Despite this challenging situation, some scholars have suggested that public service media (PSM), particularly through their local and regional branches or correspondents, could help fill this informational void (Abernathy, 2020; Gulyas & Baines, 2020). Public service media serve as a vital source of impartial information and diverse political perspectives,³ while also providing a platform for public debate and fostering broader democratic participation among citizens.⁴ In contrast to commercial organisations primarily driven by profit, public service media are serving public interest, grounded in six core values: universality, independence, excellence, diversity, accountability, and innovation (EBU, 2012). Furthermore, Cañedo et al. (2022) identified twelve components that constitute the public value of public service media and classified them in three groups: essential, important, and interesting. Among the interesting value group is territorial cohesion, understood as fostering the social and cultural cohesion of territories. Therefore, through its role, PSM could supply local communities with relevant and essential information.

The sub indicator *PSM and local coverage* tracks developments related to the role of public service media in serving the public interest of local communities. The assessment is based on three aspects: the existence of legislation regulating local and regional PSM coverage; the actual presence of regional branches or correspondent networks which provide quantitative assessments of the local/regional PSM landscape; and, finally, the quality of PSM coverage of local issues.

This sub indicator records the lowest level of risk at the level of the EU26⁵ within the **Local/regional and community media** indicator, suggesting that public service media generally provide adequate coverage of regional and local issues. Several cases point to the existence of developed PSM networks with regional and local coverage. This is evident even in countries where legislation does not ex-

plicitly require public service media to maintain such structures (for example in Latvia, Lithuania, Sweden).

Around 65% of countries fall within the low or very low-risk band (Figure 5.j), underscoring the generally satisfactory level of local coverage provided by public service media. In the Netherlands, which has a robust system of regional public broadcasters, NLPO (the organisation representing local public broadcasters) published a report demonstrating how citizen participation contributes to diverse reporting that addresses a broad range of critical information needs (De Swert et al., 2026, citing NLPO, 2025). In Denmark, no significant reductions in the local structures of public service media have been reported since 2024, and their overall capacity appears to have remained stable (Simonsen, 2026). Italian legislation obliges RAI to maintain an extensive network of regional editorial offices to ensure continuous local news coverage (Vigevani et al., 2026), while Swedish public service media continue to play a crucial role in safeguarding the availability of local news within the broadcasting sector (Färdigh, 2026).

However, the issue is not only whether public service media are capable of covering local and regional areas, but also whether their independence and financial stability are adequately protected. Reviglio et al. (2025) identify a statistically significant positive correlation showing that countries with strong public service media also tend to demonstrate more favourable conditions regarding news deserts, further confirming the findings of Verza et al. (2024) and Gulyas (2023).

3 Council of Europe. (2022). Public Service Media. <https://rm.coe.int/leaflet-public-service-media-en/1680735c27>

4 European Media Freedom Act (EMFA), Regulation (EU) 2024/1083. <https://eur-lex.europa.eu/eli/reg/2024/1083/oj/eng>

5 Malta is excluded from this subindicator due to its small size and the significant overlap between national and local media.

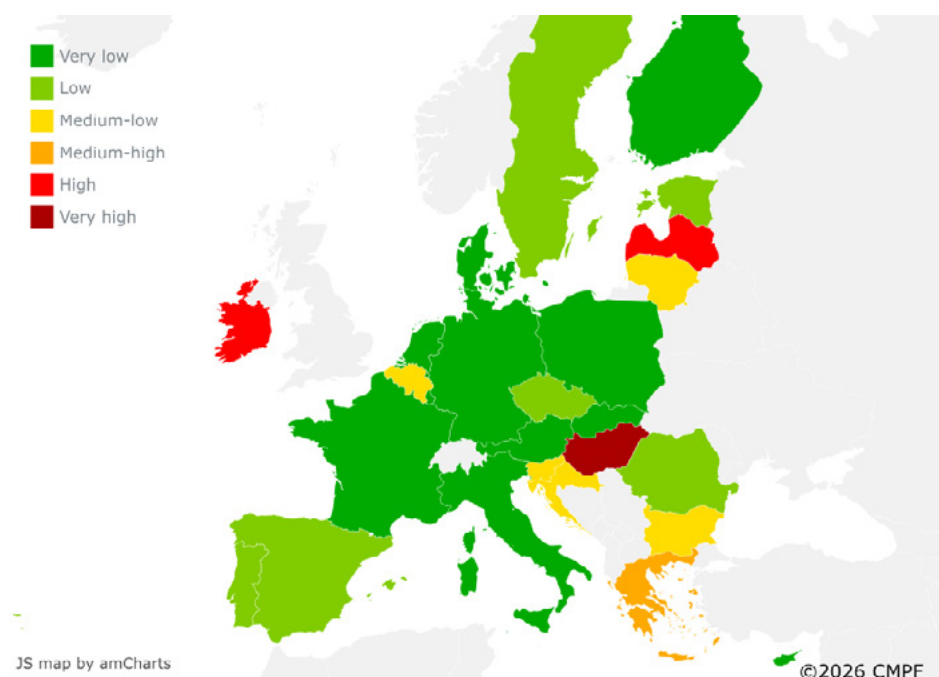


Figure 5.j. Map of risk scores for PSM and local coverage sub indicator for EU26 (without Malta)

There has been a growing and concerning tendency among many governments to tighten their control over the media sector, particularly over national public and state media outlets, which are often among the largest media organisations and key providers of content with substantial influence on audiences (Dragomir & IAPMR, 2025). Many public service media systems in Southern and Central Eastern Europe remain susceptible to political influence, which may undermine both the quality of their content and the level of public trust they enjoy (Šimunjak, 2016). These concerns are also reflected in the latest results of the Media Pluralism Monitor 2026 (see the Political Independence chapter and Figure 5.k).

In Hungary, which records the highest risk score for the *PSM and local coverage* sub indicator (very high risk), local PSM studios had been closed by 2016, while the centrally produced PSM content is widely considered to be heavily biased as a result of political capture (Bleyer-Simon et al., 2026). Meanwhile, Slovak Television and Radio still complies with its legal duty to maintain regional studios and staff networks and to provide regional news programming (Urbániková, 2026). Another issue is the fact that the independence of public service media

is characterised as very high risk, thereby questioning the fulfilment of critical information needs by these PSM networks in Slovakia (Figure 5.k). Similarly, although Czech public service media maintain a comparatively strong regional presence, this only partly mitigates the decline of independent local journalism and does not always guarantee thorough oversight of local political and economic power (Štětka et al., 2026).

Regarding the challenges related to insufficient financial resources, even in Estonia where the *PSM and local coverage* sub indicator is low risk, potential reductions in PSM resources may weaken the provision of comprehensive local coverage, as the planned 5% budget cut in 2025 threatens to diminish public service media's capacity to fulfil its public remit (Joesaar, 2026). Similarly, in the Netherlands, De Swert et al. (2026) mention that even though the process of improvement is underway as regional media are expected to receive more stable funding directly from the national government rather than from municipalities with the aim of promoting greater equality and professionalisation, this reform is also expected to lead to a reduction in the number of local public broadcasters to approximately 80 semi-regional broadcasters in the near future. In

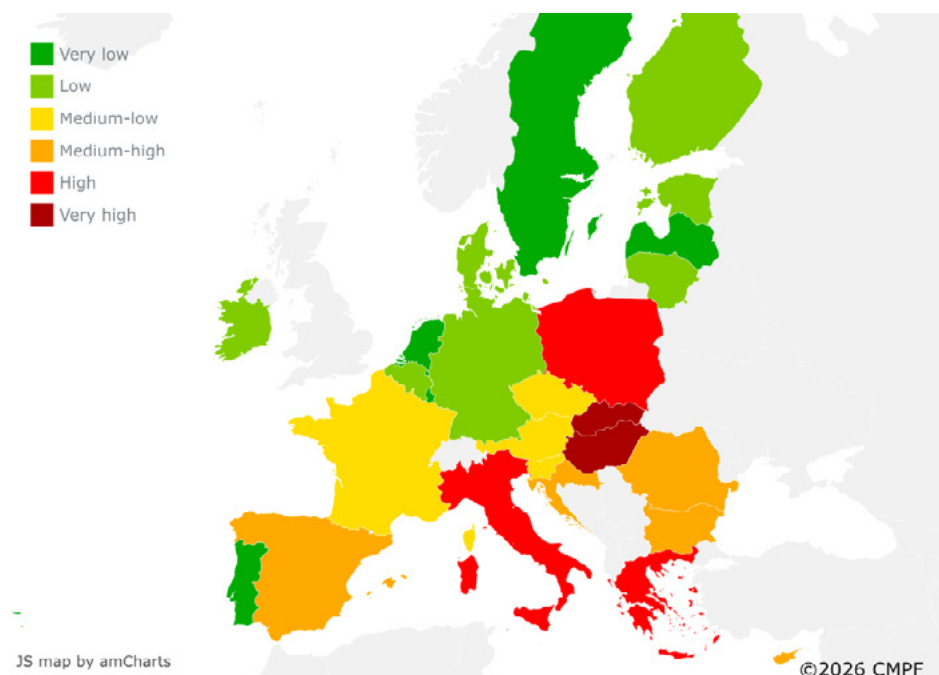


Figure 5.k. Map of risk scores for Independence of public service media indicator for EU26 (without Malta)

addition, the planned semi-regional public broadcasters are likely to compete with existing regional broadcasters and private local media outlets, potentially threatening their long-term sustainability and viability. How this reduction will affect the provision of public interest news on regional and local level remains to be seen.

As already indicated, political interference and insufficient financial resources within public service media may negatively affect the quality of public-interest news at the regional and local levels. Four of the 26 countries reported no data for the qualitative assessment of regional/local coverage (Austria, Belgium, Slovenia, and Romania). Nevertheless, the absence of such data was, in most cases, not considered a major risk. In Greece, for example, local television coverage remains insufficient and fails to fully meet the critical information needs of local communities (Papadopoulou & Angelou, 2026, citing ESR, 2025). Bulgarian PSM was even fined for failing to provide regional news coverage (Spasov et al., 2026, citing CEM, 2025n). Meanwhile Spanish public service media tend to focus their coverage on urban centres, often neglecting rural and remote areas (Suau et al., 2026). In Ireland, local correspondents are typically engaged only when RTÉ considers a story from their region significant enough for

national news bulletins. As a result, weeks may pass without local contributions, leaving the information needs of local audiences largely dependent on commercial local media (Flynn, 2026). Germany represents a particularly notable case, as public broadcasters are legally restricted from covering local issues, particularly online, a measure intended to safeguard the private press market. According to experts, this limitation may ultimately result in a complete lack of local reporting in future news deserts (Kalbhenn, 2026, citing Kalbhenn, 2024).

To conclude, although the situation regarding public service media and local coverage appears relatively positive, PSM cannot fully compensate for the decline of local news provision and can therefore address the problem of news deserts only to a limited extent. Further research and data are needed to assess both the extent and the quality of PSM coverage of local issues. One potential solution may lie in greater cooperation between local media outlets and public service media, which is an approach currently being discussed in countries such as Latvia and Sweden. At the same time, however, such arrangements may also entail certain risks, including the migration of young professionals from regional media outlets to public service media (Rožukalne & Skulte, 2026).

5.2.3. Focus 3 - Measuring news media literacy

In its *Shaping Europe Digital Future*, the European Commission highlights the importance of Media literacy:

Media literacy empowers citizens to make informed choices, covering both traditional and digital media. Understanding the constantly evolving media environment and critically assessing the sources of information are essential to participate in an open democratic debate. Media literacy also contributes to societal resilience against disinformation and foreign information manipulation and interference by helping individuals detect and counter misleading and harmful content (European Commission, 2026⁶).

In line with the European Media Freedom Act (European Union, 2024), media literacy is an essential skill for a healthy and resilient democracy. People need to master media literacy skills so as to fully enjoy fundamental rights, such as freedom of expression and access to information (UNESCO, 2013), especially in a changing world in which information integrity is at risk. As such, media literacy is a core element of the *Media Pluralism Monitor*, which considers it a fundamental prerequisite of an accessible media system.

Media literacy was added as an indicator to the *Media Pluralism Monitor* in 2020. Over the years, the variables used to assess media pluralism have focused on four sub-indicators: 1/ *Media literacy governance framework*—that is the existence of media literacy policies and of adequate funding to give life to these policies, 2/ *Media literacy in the compulsory curriculum*—the space allocated to media literacy within the mandatory school curriculum, including the training of teachers, 3/ *Lifelong media literacy activities*—media literacy initiatives conducted outside of the educational, and 4/

Media literacy skills—the level of media literacy skills within the population. If the first three criteria are rather straightforward, the fourth criterion has always been a source of intense discussion during the fine-tuning of the MPM questionnaire.

The CMPF team originally developed its assessment of media literacy skills based on the definition provided by the Audiovisual Media Service Directive, in which media literacy is defined in a more functional way as:

...skills, knowledge and understanding that allow citizens to use media effectively and safely. In order to enable citizens to access information and to use, critically assess and create media content responsibly and safely, citizens need to possess advanced media literacy skills. Media literacy should not be limited to learning about tools and technologies, but should aim to equip citizens with the critical thinking skills required to exercise judgment, analyse complex realities and recognise the difference between opinion and fact (Directive (EU) 2018/1808).

To measure media literacy skills, the MPM mostly relies on Eurostat's individuals' level of digital skills dataset. In MPM2020 and MPM 2021, the Eurostat's individuals' level of digital skills dataset (2015-2019) was used. The digital skill indicator was calculated according to four variables: 1/ *Information skills*—that is, the ability to identify, locate, retrieve, store, organise and analyse digital information, and to judge its relevance and purpose; 2/ *Communication skills*—to be able to communicate in digital environments, share resources through online tools, link with others and collaborate through digital tools, interact with and participate in communities and networks, as well as understand cross-cultural awareness; 3/ *Problem Solving Skills*—the ability to identify digital needs and resources, make informed decisions as to which are the most appropriate digital tools according to the purpose or need, solve conceptual problems through digital

⁶ European Commission (2026, April, 30th). *Shaping Europe's digital future. Media literacy*. <https://digital-strategy.ec.europa.eu/en/policies/media-literacy>

means, creatively use technologies, solve technical problems, and update one's own and others' competences; 4/ Software skills (for content manipulation)—create and edit new content (from word processing to images and video), integrate and re-elaborate previous knowledge and content, produce creative expressions, media outputs and programming, and deal with and apply intellectual property rights and licences. These skills are, however, very general and do not focus on news media literacy

The change of the Eurostat methodology in 2021 was therefore welcome, with the integration of a more news focused indicator: *Information and data literacy skills*, defined by the Digital Competence Framework 2.2 as the capacity to 'articulate information needs, to locate and retrieve digital data, information and content. To judge the relevance of the source and its content. To store, manage, organize digital data, information and content' (Vuorikari et al., 2022). This indicator has therefore been used since the MPM 2023. However, a closer look at the calculations shows that the level of news media literacy to be considered above basic remains limited. The activities used for calculating the information and data literacy skills are: 1/ finding information about goods or services; 2/ seeking health-related information; 3/ reading online news sites, newspapers or news magazines; and 4/ activities related to fact-checking online information and its sources. To score above basic levels, participants should declare proficiency in more than one activity.

However, this indicator is far from reflecting media literacy skills according to the definition of media literacy provided in AVMSD. It aligns only with the first part about "learning about tools and technologies", but overlooks the aspects related to "critical thinking skills required to exercise judgment, analyse complex realities and recognise the difference between opinion and fact". Given the pitfalls identified in the Eurostat

data, other options, considered references in the field of media literacy study, were explored as possible variables for the dataset. Among them, was the annual OSI Sofia Media Literacy Index⁷ often cited in the media. It consists of a composite index that includes eight proxies to media literacy—namely the Country Freedom of the Press score by Freedom House, the Press Freedom Index by Reporters without Borders, PISA score in reading, mathematical and science literacy, tertiary education enrolment, trust in others, and E-participation that ranks countries. However, it does not provide an assessment of media literacy skills as such, and partially overlaps with the MPM assessment. Otherwise, most of the other media literacy are either one-time assessments (e.g. Study on Assessment Criteria for Media Literacy coordinated by EAVI for the European Commission in 2009⁸, UNESCO's 2013 Global MIL Assessment Framework⁹) or of a narrow scope such as the Nordic Media Literacy Survey for TemaNord carried out in 2025 in five countries¹⁰. There is no large-scale assessment of media literacy, nor is there any large-scale assessment of news media literacy with established metrics.

Consequently, the set of variables used by the MPM to measure media literacy skills has evolved over time without ever finding the exact perfect fine-tuning (see Table 5.2).

7 Open Society Institute Sofia (2026). *Media Literacy Index 2026: Denmark, Finland, Ireland, and Netherlands Lead European Ranking of Resilience against Disinformation*. <https://osis.bg/?p=5746&lang=en>

8 EAVI (2009). *Study on Assessment Criteria for Media Literacy Levels. A comprehensive view of the concept of media literacy and an understanding of how media literacy levels in Europe should be assessed*. https://ec.europa.eu/assets/eac/culture/library/studies/literacy-criteria-report_en.pdf

9 UNESCO (2013). *Global Media and Information Literacy Assessment Framework: country readiness and competencies*. <https://www.unesco.org/en/articles/global-media-and-information-literacy-assessment-framework>

10 TemaNor (2025). *Nordic Media Literacy Survey*. <https://pub.norden.org/temanord2025-572/>

Table 5.2. Evolution of the Media literacy skills indicator

Implementation	Variables	Rationale	Threshold	Limitations
2020, 2021 & 2022	2 variables What is the percentage of the population that has basic or above basic overall digital skills? What is the percentage of the population that has low overall digital skills?	Use of Eurostat dataset on Individual digital skills - Individuals' level of digital skills (2015-2019) ¹¹ In 2022, there was a change of dataset linked to the discontinuity of the previous dataset - Replacement by Eurostat dataset on Individual digital skills - Individuals' level of digital skills (from 2021 onwards) ¹²	- Internal threshold calculated using High/middle/lower tertiles - Thresholds were adapted every year.	- Internal thresholds: the assessment is made in comparison with others instead of absolute performance threshold. - The high correlation between these variables over the three implementations suggested redundancy.
2023	1 variable What is the percentage of the population that has basic or above basic overall digital skills?	A very high correlation between the two variables over the years suggested redundancy.	No change	Only one variable per sub-indicator created a problem of imbalance in the questionnaire.
2024	1 variable What is the percentage of the population that has basic or above basic Individuals information and data literacy skills?	Instead of using the full digital indicator from the Eurostat dataset, only its first component was taken into account- information and data literacy skills - which is closer to news media literacy	No change	Only one variable per sub-indicator created a problem of imbalance in the questionnaire
2025	2 variables What is the percentage of the population that has basic or above basic Individuals information and data literacy skills? What is the share of individuals who have checked the truthfulness of the information or content they found on internet news sites or social media over the past 3 months in your country?	A second variable was added to balance weight in the calculation of the risk level. The second variable uses Eurostat dataset on Evaluating data, information and digital content (2021 onwards) ¹³	No change	Contradictory patterns between high information and data literacy skills and checking the truthfulness of the information or content. Truthfulness appeared to be a misleading proxy, suggesting that average trust in the media may have an impact.
2026	2 variables What is the share of the population that has above basic information and data literacy skills? Are information and data literacy skills evenly distributed across the country, considering differences between urban and rural populations, age, gender and education level?	The variable on fact-checking information was replaced by a coefficient calculating the homogeneity of media literacy skills among different groups of populations. ¹⁴	No change	No significant patterns observed. The question is not granular enough to provide an interesting insight. Palmer et al. (forthcoming) suggests that the educational background may have an impact on overall digital skills but only for advanced critical thinking skills.

11 Eurostat (n.d.). *Individuals' level of digital skills (2015-2019)*

https://ec.europa.eu/eurostat/cache/metadata/en/isoc_sk_dskl_i_esmsip2.htm

12 Eurostat (n.d.). *Individuals' level of digital skills (from 2021 onwards) (isoc_sk_dskl_i21)*

https://ec.europa.eu/eurostat/cache/metadata/en/isoc_sk_dskl_i21_esmsip2.htm

13 Eurostat (n.d.). *Evaluating data, information and digital content (2021 onwards)*

https://ec.europa.eu/eurostat/databrowser/view/isoc_sk_edic_i21/default/table?lang=en&category=isoc.isoc_sk.isoc_skul

14 This variable measures the homogeneity in digital skills proficiency across different population groups, namely urban and rural populations, age groups, gender and education level. The risk score for this variable is calculated as follows: (1) The standard deviation of digital skill proficiency (covering Eurostat's five core digital skill domains) is calculated across four demographic groups (urban/rural, age cohort, gender, education level); (2) The composite index score is then calculated as the average standard deviation across the four demographic groups; (3) Countries are then grouped into tertiles, with a higher standard deviation (the proxy for unequal distribution) representing a higher risk score.

This absence of large-scale assessment of news media literacy with established metric, to some extent, prevents a thorough assessment of media literacy policies and activities, as we cannot measure their effectiveness in the long run. There is a serious need for proxies to assess media literacy, as defined in EMFA, that takes into account ‘critical thinking skills required to exercise judgment, analyse complex realities and recognise the difference between opinion and fact’. The OECD’s Programme for International Student Assessment (PISA), has announced its intention to measure media and artificial intelligence literacy in its next edition. This is an excellent first step, but media literacy assessment cannot be reduced to the younger group of the population.

5.3. Recommendations for Social Inclusiveness

In line with the MPM 2025, the medium-low risk level associated with Social Inclusiveness in the MPM 2026 highlights persistent structural issues, particularly linked to gender equality in the media and maintaining a safe media environment with adequate cultural and linguistic diversity. Strengthening the media literacy skills of European citizens also emerges as a major concern. The level of risk varies significantly across countries. Scandinavian countries, as well as Germany and the Netherlands, stand out as they fall within the low-risk category and demonstrate visible progress through innovative initiatives in this area. Sweden appears as the example to follow, being the only country to score in the very low risk band. In contrast, all other countries face higher levels of risk, largely due to notable disparities across different indicators. Based on these observations, the following stakeholders should implement the following recommendations:

EU institutions should:

- Consider a revision of Article 7a of the AVMSD on appropriate prominence, taking into account the current difficulties of interpreting and putting into practice the notion of appropriate prominence.

Member States and public authorities should:

- Develop a comprehensive strategy with relevant stakeholders to avoid the spread of “news deserts”. This includes the creation of long-term and dedicated funding to support local media as an essential element in the fight against news deserts. Best practices in the field are:
 - The experience of the Swedish Media support fund which focuses on local media.
 - The experience of the Danish fund to support local investigative journalism to guarantee quality local journalism.
- Ensure a solid legal framework for community media that includes forms of media outlets other than radio or TV. A legal definition is essential to provide access to funding. Community media are essential to fight against the spread of news deserts as well as disinformation.
- Developing a comprehensive strategy with relevant stakeholders to provide an adequate response to hate speech. Relevant actors include, among others, state actors, national regulatory activities, civil society, NGOs, police forces, VLOPs and VLOSEs. Best practices in the field include:
 - The creation of a memorandum with a variety of stakeholders in Lithuania to define a long-term action plan. Ensure that police forces are trained on aspects of online hate speech, and effective responses to provide for hate speech victims.
- Contribute to foster gender diversity in the media by:
 - Including the obligation of gender parity in media management boards within the PSM service contract.
 - Including the obligation of monitoring content within the PSM service contract.
 - Paying particular attention on gender diversity at the local level.

- Developing a comprehensive strategy with relevant stakeholders to foster media literacy within the population. This includes:
 - Providing an up-to-date and comprehensive definition of media literacy. Media literacy policies should be updated to include current challenges linked to disinformation and AI. However, media literacy should not be reduced to digital literacy and must include news media literacy, following the comprehensive definition contained in Art.2(21) EMFA.
 - Providing long-term funding to media literacy to ensure an effective action plan.
 - Inciting VLOPs and VLOSEs to develop co-operations with other stakeholder to finance media literacy projects.
- Organising trainings to foster gender-equality awareness of working journalists.
- Monitoring media content to identify inequalities.
- Making diversity policies easily available to the public.
- Strengthen cooperation between PSM and local commercial media companies in order to contrast the “news desert” phenomenon.
- Continue fostering media accessibility for people with disabilities. This includes:
 - Working in partnership with NGOs focusing on media accessibility for people with disabilities to develop tools that are adapted to their needs. Audio-descriptions for people with disabilities should be considered as a priority.
 - Exploring new AI-related technology to improve media accessibility. Italy is a good example of what can be achieved, as is Estonia (see Palmer & Zuffova, 2024)

National regulatory authorities should:

- In partnership with PSM, implement a systematic quantitative and qualitative monitoring of PSM content to assess the representation of all groups in society including minorities, marginalised groups and women and improve their representation. Best practices in the field are:
 - The experience of the Finnish public broadcaster Yle is an example of good practice to replicate in terms of monitoring (see Blagojev et al., 2025; Ylikoski & Ala-Fossi, 2025).
- Systematically gather local media market data including local media revenues and audience research.

Public service media and commercial media companies should:

- Develop a comprehensive strategy to guarantee a diverse and inclusive media environment, with an emphasis on gender equality, which remains a major problem. This includes:
 - Ensuring diversity within the newsroom, including in managing positions.
 - Developing editorial guidelines that promote

Very large online platforms should:

- Collaborate with national authorities and public service media to define a strategy to define and guarantee the appropriate prominence of public service media.
- Actively contribute to the fight against hate speech. This includes:
 - Collaborating with national regulatory authorities to implement in practice the obligation of the DSA.
 - Providing more country specific systemic risk assessment reports, with clear and transparent data on moderation and content removal practices.
 - Providing national data to researchers to measure hate speech phenomena online.

- Collaborate with national authorities to develop adapted media literacy initiatives in national languages

Chapter 6

Media Pluralism in four EU candidate countries

Albania, Montenegro, Serbia and the Republic
of North Macedonia

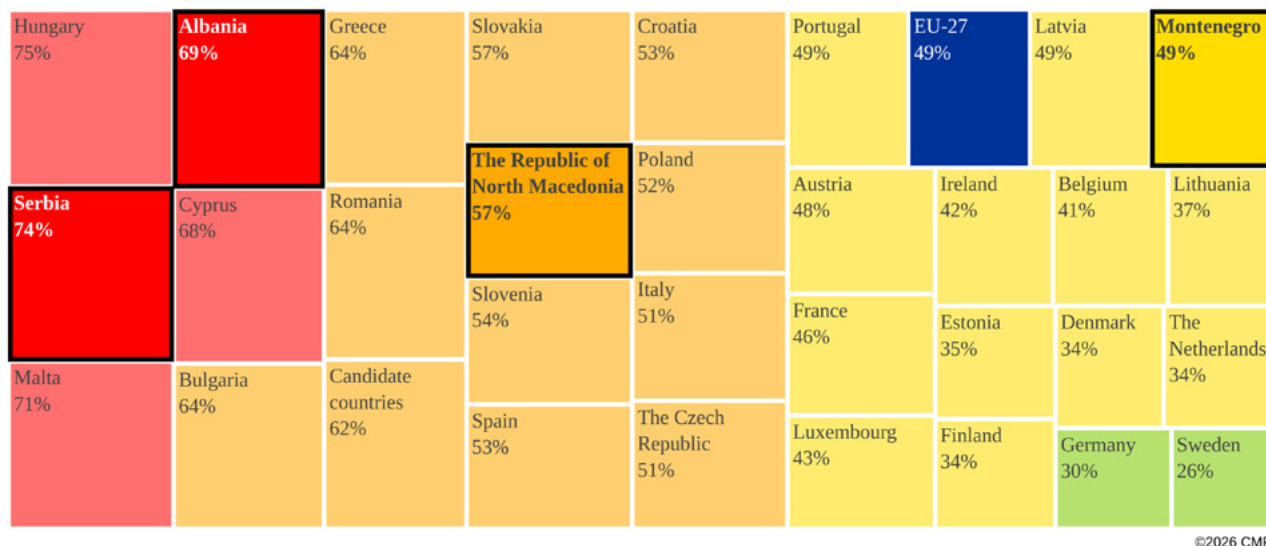


Figure 6.a. Overall assessment - General tree map ranking including candidate countries

This chapter analyses the risks to media pluralism in the following EU candidate countries: Albania, Montenegro, Serbia, and the Republic of North Macedonia.¹ Among them, Montenegro has made the most significant progress in the EU accession process, having provisionally closed 14 out of 33 negotiation chapters,² while EU member states' ambassadors approved the establishment of an ad hoc working group tasked with drafting Montenegro's Accession Treaty.³ Conversely, in Serbia, the deterioration of the rule of law and media freedom has prompted serious warnings from EU institutions, and the European Commission is currently assessing whether the country complies with the conditions for receiving EU funding.⁴ The results of MPM 2026 reflect similar trends in the field of media pluralism.

In MPM 2026, Montenegro is the best performing candidate country, falling from the medium-high to the medium-low risk band. This progress is primarily attributed to the adoption and implementation of new media legislation. In particular, two missing members of the regulator Agency for Audiovisual Media Services (AMU) were elected, while its competencies and enforcement powers were expanded. Sanctions were introduced for unregistered online outlets, the independence of local public broadcasters was strengthened through guaranteed funding, the budget of the Media Pluralism Fund was increased, and the Public Service Media (PSM) Council was restored to full capacity (Brkić Ružić, 2026). Furthermore, the ministry of culture and media and ministry of economic development drafted a law on the implementation of the Digital Services Act (DSA)⁵ and Digital Markets

1 Türkiye is not part of this year's monitoring, therefore, aggregate-level comparisons for candidate countries with the year before will not be conducted.

2 European Commission. (2026, March). Montenegro - Membership status: candidate country. Enlargement and Eastern Neighbourhood. https://enlargement.ec.europa.eu/countries/montenegro_en

3 European Western Balkans. (2026, April 22). EU ambassadors approve working group for Montenegro accession treaty - European Western Balkans. European Western Balkans. <https://europeanwesternbalkans.com/2026/04/22/eu-ambassadors-approve-working-group-for-montenegro-accession-treaty/>

4 Dimitrova, R., & Jeliakov, N. (2026, May 4). No Formal Decision to Suspend Funds for Serbia over Law Reforms, European Commission Spokesperson Says. Wwww.bta.bg; BTA. <https://www.bta.bg/en/news/world/1118954-no-formal-decision-to-suspend-funds-for-serbia-over-law-reforms-european-commis>

5 Vlada Crne Gore. (2026a). Javni poziv - Nacrt zakona o sprovođenju regulative o digitalnim uslugama. Vlada Crne Gore. <https://www.gov.me/clanak/javni-poziv-nacrt-zakona-o-sprovođenju-regulative-o-digitalnim-uslugama>

Act (DMA)⁶ respectively, which, at the time of writing, are undergoing public consultations. The government also expressed willingness to incorporate the European Media Freedom Act (EMFA) into the Montenegrin legal framework⁷. However, Brkić Ružić (2026) notes that Montenegro has yet to align its legislation with the GDPR, while high media concentration, indirect political influence over the media, attacks on journalists, and the prevalence of hate speech continue to burden the media environment.

In contrast, Serbia's media situation has significantly deteriorated. The media regulator has been non-functional for more than a year, while physical attacks on journalists have increased alongside growing institutional pressure and unlawful digital surveillance (Milutinović, 2026). As a recent development, the government established a working group to once again amend media laws, this time with the aim of harmonising them with the European Media Freedom Act (EMFA). However, this move has raised concerns among representatives of journalists' associations and media organisations, who argue that Serbia is not prepared to address the complex requirements stemming from the EMFA given the absence of a functioning regulator and the ongoing problems with the implementation of existing legislation.⁸

The European Parliament's Foreign Affairs Committee praised Albania's strong commitment to EU accession and progress in reforms, while calling for further efforts in the areas of the rule of law, anti-corruption, media freedom, and political dialogue.⁹

Furthermore, it is the second candidate country, after Montenegro, to receive an Interim Benchmark Assessment Report and is in the final stage of negotiations.¹⁰ According to the results of MPM 2026, media pluralism in Albania remains in the high-risk category. Some of the issues include the uneven implementation of the legal framework, existing legislative gaps, the concentration of media ownership in the hands of a small number of family-owned enterprises closely linked to non-media businesses, and continued impunity related to physical attacks against journalists. On a more positive note, the state police adopted guidelines on safety of journalists, designated contact persons, and integrated training modules into professional development programmes. In addition, the parliament adopted a Law on Whistleblowers and the National Strategy Against Foreign Interference and Disinformation (Likmeta & Voko, 2026).

The Republic of North Macedonia remained in the medium-high risk band, with persistent challenges including the lifting of the ban on state advertising, which may be used as a tool for exerting control over the media, the lack of transparency in election campaign spending, the postponement of legislative harmonisation with the European Media Freedom Act (EMFA) and the Digital Services Act (DSA), and the visible decline of the local media market. Extensive government influence over the media has further deepened concerns that media pluralism is being constrained not only through structural dependencies, but also through sustained political pressure on critical journalism and public discourse (Micevski & Trpevska, 2026). Micevski & Trpevska

6 Vlada Crne Gore. (2026b). Javni poziv - Nacrt Zakona za Sprovođenje Regulative (EU) 2022/1925 o Digitalnim Tržištima. Euprava.gov.me. https://euprava.gov.me/e-participacija/Javna_Rasprava/javni-poziv--nacrt-zakona-za-sprovo%C4%91enje-regulati

7 Đurišić, J. (2025, August 11). Plan da DSA i EMFA budu dio crnogorskog pravnog poretka tokom 2026. godine | EUME. Wwww.eu.me. <https://www.eu.me/plan-da-dsa-i-emfa-budu-dio-crnogorskog-pravnog-poretka-tokom-2026-godine/>

8 Coalition for Media Freedom (2026, March 24). Coalition for Media Freedom: Serbia is not ready for the European Media Freedom Act (EMFA). Slavko Ćuruvija Fondacija. <https://www.slavkocuruvijafondacija.rs/en/coalition-for-media-freedom-serbia-is-not-ready-for-the-european-media-freedom-act-emfa/>

9 ATA. (2026, May 5). EP Foreign Affairs Committee adopts report on Albania; MEPs praise Albania's dedication to joining EU. <https://en.ata.gov.al/2026/05/05/ep-foreign-affairs-committee-adopts-report-on-albania-meps-praise-albanias-dedication-to-joining-eu/>

10 European Western Balkans. (2026b, May 27). *Kos: "Albania has officially transitioned into the concluding phase of EU accession negotiations"* - European Western Balkans. European Western Balkans. <https://europeanwesternbalkans.com/2026/05/27/kos-albania-has-officially-transitioned-into-the-concluding-phase-of-eu-accession-negotiations/>

(2026) further state that although the Law on Media was amended to introduce transparency requirements for digital media service providers, these measures appear insufficient, as many media outlets have still not disclosed ownership and financial information.

Risks to media pluralism across the areas of **Fundamental Protection**, **Market Plurality**, **Political Independence**, and **Social Inclusiveness** remain higher in candidate countries than in the EU27. By contrast, most areas in EU Member States are assessed as posing a medium-low risk, with the exception of **Market Plurality**, which remains in the high-risk category.

The area of **Fundamental Protection** falls within the medium-low risk band, suggesting that legislation ensuring fundamental protections is largely in place in candidate countries; however, the main challenge lies in its implementation. This is further compounded by precarious working conditions for journalists, as well as physical and online attacks, threats, and intimidations targeting media workers. Another particularly worrying trend is the rise of digital surveillance of journalists that was reported in some countries.

Both the EU27 and candidates record the highest risk in the area of **Market Plurality**, highlighting the widespread crisis affecting media markets. In addition, the lack of data across all media sectors makes the assessment of this area especially challenging in candidate countries.

The largest gap between the EU27 and candidate countries is recorded in the areas of **Political Independence** and **Social Inclusiveness**, indicating that challenges in these fields are more pronounced in candidate countries. In particular, **Political Independence**, which falls within the medium-high risk band for candidate countries, is undermined by political influence over editorial policies, weakened media independence, and the political capture of public service media (PSM). Meanwhile, the area of **Social Inclusiveness**, assessed as high risk among candidate countries, is characterised by the spread of hate speech, persistent challenges in ensuring access to information for specific groups—including persons with disabilities, women, local and regional communities, and minorities—as well as underdeveloped media literacy initiatives.

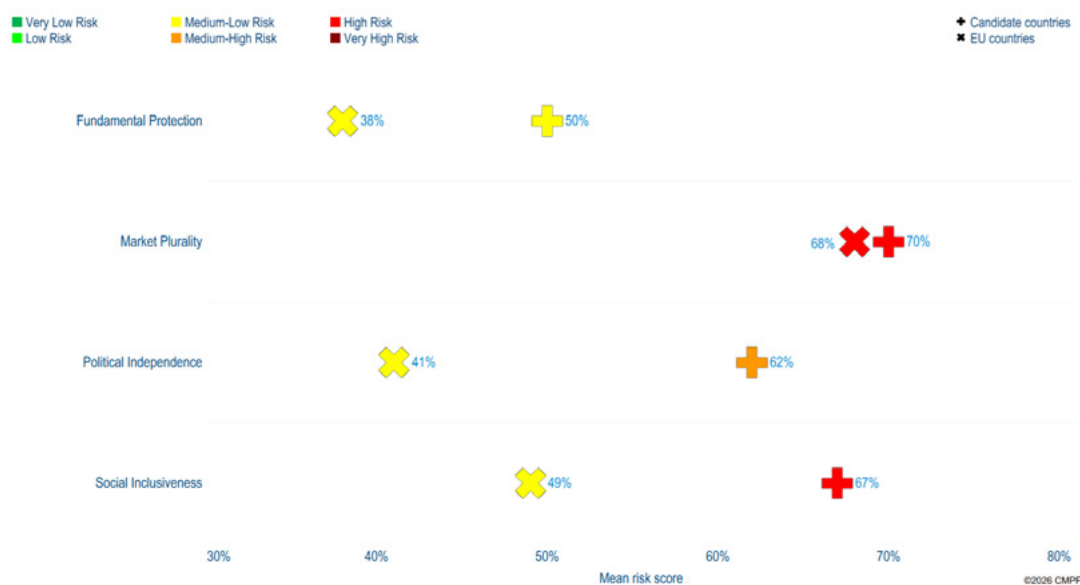
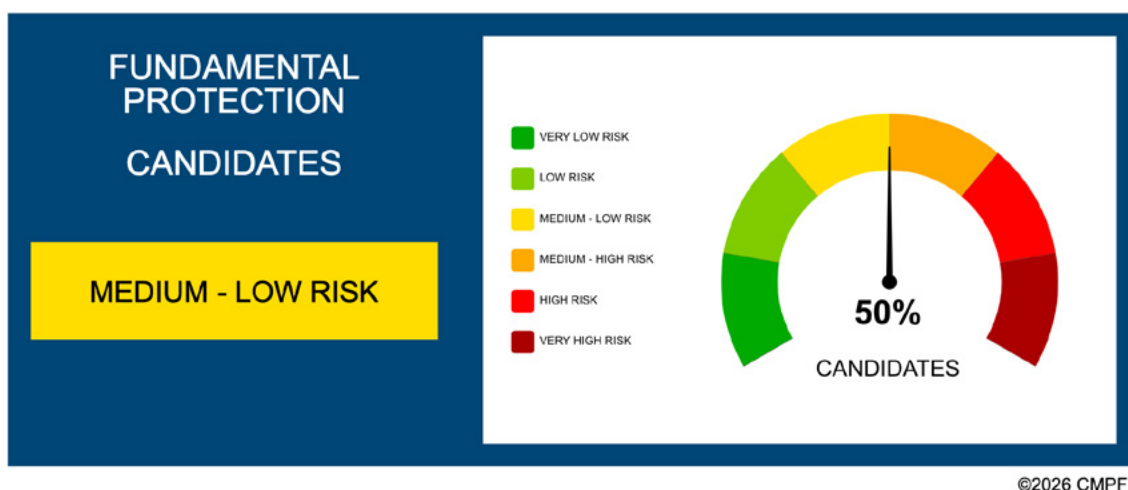


Figure 6.b. Risk per area candidate countries vs. EU Member States

6.1. Fundamental Protection



The area of **Fundamental Protection** lies close to the threshold between the medium-low and medium-high risk bands. All indicators show higher levels of risk in candidate countries compared to EU Member States, and the indicators **Protection of freedom of expression** and **Protection of the right to information** are within the same medium-low risk category for both groups. For candidate countries, the highest risks are recorded in the areas of **Protection of information integrity** and **Journalistic profession, standards and protection**, underscoring persistent challenges related to

the regulation and safeguarding of online information, as well as the difficult working conditions and safety concerns faced by journalists and media workers across all countries. Although the lowest level of risk is recorded for the indicator **Independence and effectiveness of national regulatory authorities**, this area still reveals numerous challenges specific to these countries, particularly concerning the independence of these bodies.

In the case of the **Protection of freedom of expression** indicator, which also falls within the me-

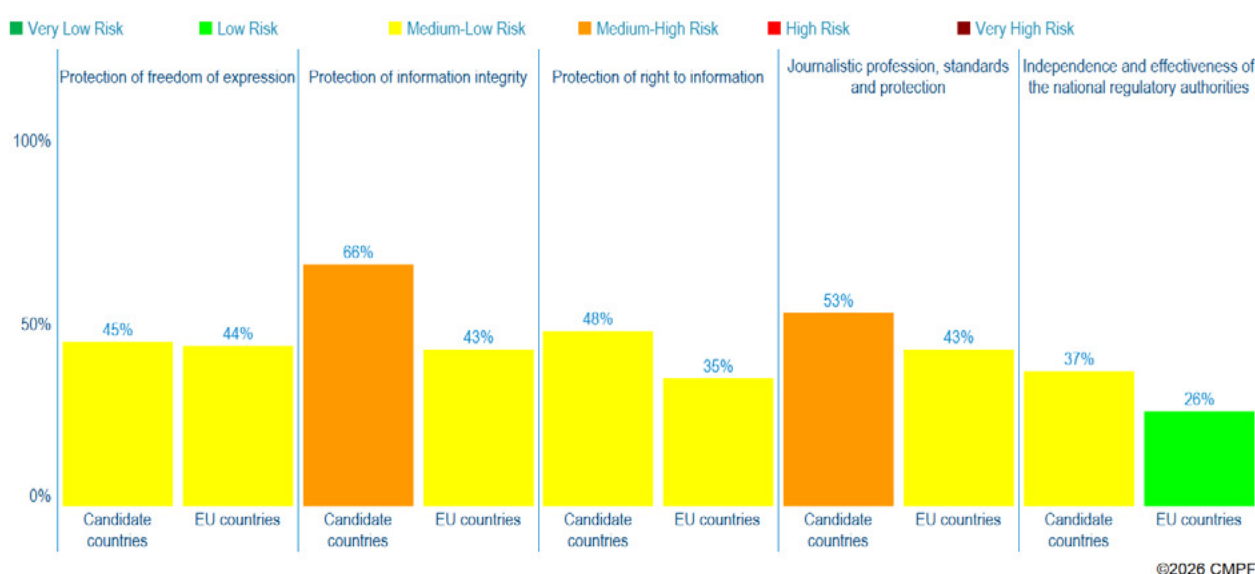


Figure 6.c. Risk per indicator for Fundamental Protection area for candidate countries vs. EU Member States

dium-low risk category, it is worth noting that dedicated anti-SLAPP legislation remains absent across candidate countries. The highest number of SLAPP cases was recorded in Serbia, where the investigative portal *Krik* alone faced 14 such lawsuits (Milutinović, 2026). Similar cases have also emerged in Montenegro, including a lawsuit filed against the newspaper *Vijesti* by Andrej Vučić, the brother of Serbian President Aleksandar Vučić, who sought €5,000 in damages for alleged harm to his reputation and honour.¹¹ The lawsuit concerned an article reporting on Andrej Vučić's alleged connections to organised crime (Brkić Ružić, 2026, citing Nikolić and Moratti, 2025). In candidate, as well as EU countries, environmental issues and corruption are two of the main topics triggering SLAPPs and threats against journalists or activists.

The highest risk within this MPM area is recorded for the indicator **Protection of information integrity** (medium-high risk), which also shows the largest gap compared to the performance of EU Member States. As highlighted by numerous experts and civil society organisations, particular attention should be paid to the harmonisation of national legislation with EU acts regulating the digital sphere. On the one hand, the potential for misuse is considerable, especially in relation to the definition and regulation of illegal content (Milutinović & Krstić, 2026; Vujić, 2024). On the other hand, candidate countries are not part of the Digital Single Market, raising questions about the effectiveness and enforcement of these rules, particularly with regard to Very Large Online Platforms (VLOPs). Across all candidate countries, VLOPs, as well as Very Large Search Engines or VLOSEs, continue to lack transparency regarding content moderation and removal practices, while governments have yet to designate Digital Services Coordinators. Additional concerns arise where media regulatory authorities are expected to assume this role, given the serious questions surrounding the independence

and functionality of such bodies in candidate countries (Nenadić & Blagojev, 2026). Based on MPM results this is particularly evident in the cases of Serbia and Albania. Montenegro has advanced the furthest in this area where a law on the implementation of the DSA is in preparation. However, this approach does not necessarily represent a universally applicable model, given the differing political and institutional contexts of other candidate countries and their varying levels of progress in the EU accession process. In Albania, an interesting case was the government's decision to block TikTok for one year due to the spread of hate speech. The measure has been challenged before the Constitutional Court, with proceedings still ongoing. (Likmeta & Voko, 2026 citing Semini LL., 2025).

For the **Protection of the right to information** indicator, which falls within the medium-low risk category, virtually all researchers from candidate countries report persistent problems related to administrative silence, the unwillingness of institutions to disclose information of public interest, unjustified refusals to provide access to information, and shortcomings in awareness about whistleblower protection. In Montenegro, although the Law on Free Access to Information was amended in 2025 to accelerate procedures and broaden the scope of information that public authorities are required to publish, the introduction of a cost-sharing provision raised concerns that it could discourage public participation and conflict with both European Court of Human Rights standards and constitutional guarantees (Brkić Ružić, 2026 citing HRA 2025).

The indicator **Journalistic profession, standards and protection** records the second-highest level of risk, remaining within the medium-high risk range and reflecting the particularly difficult position of journalists in candidate countries. Persistently poor working conditions across all candidate countries—

¹¹ By the time this report was published, Andrej Vučić's lawsuit against *Vijesti* over Sky ECC messages had been dismissed. Kočanović, J. (2026, May 27). *Javnost treba da zna za Vučića iz Skaja: Odbijena kao neosnovana tužba brata predsjednika Srbije protiv "Vijesti."* *Vijesti.me*; *Vijesti*. <https://www.vijesti.me/vijesti/crna-hronika/810390/javnost-treba-da-zna-za-vucica-iz-skaja-odbijena-kao-neosnovana-tuzba-brata-predsjednika-srbije-protiv-vijesti>

Article 4 EMFA - Protection of journalistic sources and communications

In candidate countries, certain legal provisions safeguarding the protection of journalistic sources are in place, with the exception of Montenegro. However, none of these countries have legislation containing specific provisions addressing the unlawful use of spyware. Cases of unlawful surveillance of journalists have been reported in both the Republic of North Macedonia and Serbia. In the Republic of North Macedonia, information received in 2025 from an official representative of the National Security Agency (ANB) indicated that a targeted group of journalists had been subjected to unlawful surveillance for several years (Micevski & Trpevska, 2026 citing SSNM, 2025). In Serbia, numerous cases of unlawful surveillance of journalists were documented, alongside pressure exerted by police officers on journalists to disclose confidential sources during mass protests. Milutinović, (2026 citing Amnesty International 2025) also reported the use of advanced spyware and forensic technologies, including Pegasus, Predator, NoviSpy, and Cellebrite. This is a highly sensitive issue that requires broad, transparent, and inclusive discussion among all relevant stakeholders across multiple disciplines, as it cannot be adequately addressed solely through media legislation. In Serbia, for example, there is opposition to discussing amendments to media laws aimed at aligning them with the EMFA while allegations of unlawful surveillance of journalists by state authorities remain insufficiently investigated and prosecuted (Stojković, 2026).

including low salaries, the absence of collective agreements, and job insecurity linked to short-term contracts—create an environment in which media workers are more vulnerable to external pressures or are driven to leave the profession altogether. At the same time, the high number of attacks, threats, and intimidation campaigns, both online and offline, often carried out with impunity, create an increasingly hostile environment for journalists and media outlets to perform their public interest role. The most severe situation was recorded in Serbia, where 98 physical attacks against journalists were documented in 2025.¹² Particularly alarming were cases involving attacks by law enforcement officers against journalists covering mass student protests, with local journalists being especially affected (Milutinović, 2026). In Albania, women journalists are particularly targeted facing online harassment, abuse and sexist attacks (Likmeta & Voko, 2026).

In Montenegro, although attacks against journalists persist, progress has been noted in the prosecution of those responsible (Brkić Ružić, 2026). One reported physical attack was related to the covering of an environmental hazard in the Republic of North Macedonia, further underlining the risks faced by journalists reporting on issues of public interest (Micevski & Trpevska, 2026 citing MIA, 2025).

Finally, although the indicator **Independence and effectiveness of national regulatory authorities** records the lowest aggregate risk within the area (medium-low), researchers in candidate countries continue to identify significant concerns. These include already existing political influence over the regulator in Albania, unclear and non-transparent selection criteria in the Republic of North Macedonia, a completely non-functional regulator in Serbia, and the fragility of the currently independent regu-

¹² Overall, 340 journalists and media outlets were affected by various forms of pressure and intimidation, including physical assaults, property attacks, and verbal threats (Milutinović, 2026, citing MFR, 2025). Reported cases include the detention of *Peščanik* columnist Dejan Ilić on suspicion of ‘causing panic and disorder’, the arrest of student journalist Luka Pešić while covering an anti-corruption protest in Belgrade, during which he was reportedly thrown to the ground as police attempted to seize his phone, and the detention of Australian SBS radio correspondent Nikola Doderović while reporting from a rally organised by the ruling Serbian Progressive Party (SNS) in Niš. In another case, a group of journalists travelling from Croatia to cover protests in Serbia was detained at the border, denied entry, and forced to return.

Article 7 EMFA - National regulatory authorities or bodies

Considering the expanded obligations stemming from the EMFA, many of which will likely fall under the responsibility of national regulatory authorities, serious concerns remain regarding the capacity and independence of these bodies in candidate countries. In some cases, the regulator is currently non-functional, as in Serbia (which scores the highest risk of all candidate countries on this indicator, in the high-risk band); in others, political dependence and the independence of certain members have been questioned, as in Albania. The Republic of North Macedonia continues to face issues related to appointment procedures and the absence of co-regulatory mechanisms, while Montenegro, despite attempts at political interference in the appointment process, has so far managed to ensure the efficient and independent functioning of its regulator. At the same time, the new responsibilities introduced by the EMFA - including media concentration assessments, monitoring the independence of public service media, overseeing the allocation of state advertising, and encouraging the development of codes of conduct to harmonise audience measurement methodologies—require substantial additional institutional and financial resources.

lator in Montenegro due to political interference in appointment procedures (delays and annulments of public calls). On a more positive note, regulators in both Montenegro and the Republic of North Macedonia are currently operating at full capacity.

Recommendations

EU institutions should:

- When assessing alignment of legislation with DSA and EMFA, consider the specificity of candidate countries, as they are not part of the Digital Single Market.

Candidate states should:

- Ensure the smooth, timely, and consistent implementation of media legislation already in force.
- Ensure the independence and effectiveness of national regulatory authorities by reducing political interference and by avoiding delays in the election of council and board members. The transparency of regulatory authorities' work

should also be strengthened. This is particularly essential prior to national legislation alignment with EMFA and DSA.

- Improve the legal framework for the protection of journalists from attacks, threats, and smear campaigns, and ensure the consistent implementation of existing legal safeguards. All cases should be thoroughly investigated and prosecuted without impunity.
- Ensure greater protection of journalistic sources by media laws and other relevant legislation and investigate and prosecute cases of unlawful surveillance of journalists and media workers.
- Publicly condemn all threats, attacks, and acts of violence against journalists in order to improve their working environment, and refrain from targeting or attacking media outlets and journalists in public discourse.
- Adopt anti-SLAPP legislation.
- Improve the implementation of the right to information law by ensuring uninterrupted access

to documents within the deadlines prescribed by law and increasing transparency.

- Strengthen legal safeguards for the protection of whistleblowers.
- Ensure transparency and the meaningful participation of all relevant stakeholders in the drafting processes of media legislation.

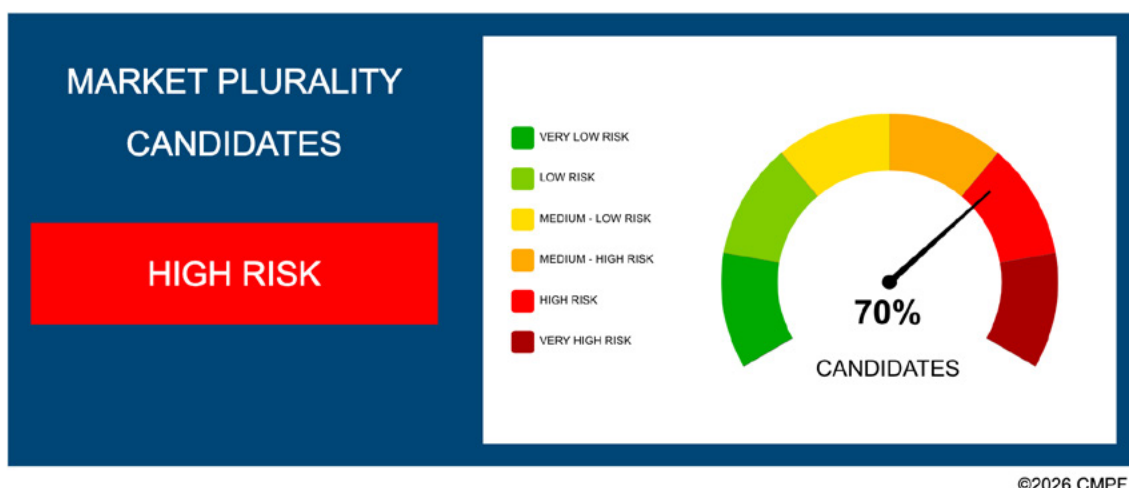
Media community and journalists' associations should:

- Strengthen measures aimed at improving journalists' working conditions and reducing labour rights violations.
- Strengthen solidarity within the media profession in order to support the media community in countering attacks and smear campaigns, particularly those initiated by state officials.
- Work towards strengthening professional associations and self-regulatory bodies.
- Develop monitoring mechanisms to track the alignment of national legislation with the EMFA and DSA.

Very Large Online Platforms and EU institutions should:

- Extend DSA compliance mechanisms to candidate countries as well. To this end, it is necessary to establish in-depth cooperation between very large online platforms (VLOPs), governments, and civil society organisations from candidate countries in line with the DSA due diligence framework. The European Commission should also play an active role in this process.

6.2. Market Plurality



The area of **Market Plurality** falls within the same high-risk band for both candidate countries and the EU27. In candidate countries, the indicators **Plurality in digital markets** and **Editorial independence from commercial and owner influence** record the highest levels of risk, very high and high risk respectively, once again highlighting the lack of effective regulation in the digital sphere, as well as the weakened independence of media outlets from commercial and business interests.

The indicator **Transparency of media ownership** is in medium-low, showing the lowest level of risk in the area, and performing better in candidate countries than in EU Member States. Progress has been observed overall, except for Serbia. This is partially due to the changes this indicator has undergone in this edition of the MPM to reflect the full application of EMFA. In Albania, improvements have been made to the legal framework; however, implementation remains insufficiently transparent, as the rules apply only to the audiovisual sector and not to print

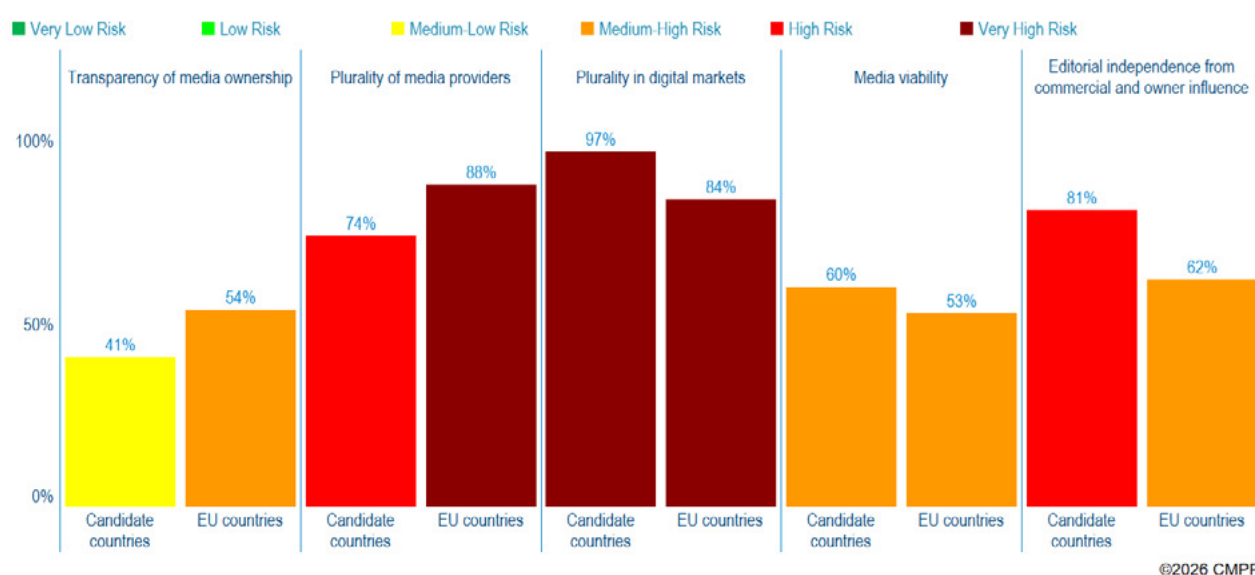


Figure 6.d. Risk per indicator for Market Plurality area for candidate countries vs. EU Member States

or online media (Likmeta & Voko, 2026). In Montenegro, transparency has been steadily improving both through public registries and on the websites of media service providers, resulting in a very-low risk level this year (Brkić Ružić, 2026). Conversely, in Serbia, registries do not provide up-to-date or easily accessible data. Apart from Montenegro, in all other candidates the alignment with EMFA Article 6 is only partial.

The indicator **Plurality of media providers** records a lower risk score in candidate countries compared to the EU27, although it still remains within the high-risk band, suggesting comparatively lower levels of media ownership concentration. However, this finding should also be viewed in light of the lack of reliable cross-sectoral data, which makes it difficult to draw more precise conclusions; and in the light of the relatively late development of the commercial media sector inside these countries.

Market concentration and Article 22 EMFA

The legal frameworks to address media ownership concentration, with limitations or thresholds or other measures, vary considerably across candidate countries. In Montenegro, media concentration is not assessed across all sectors and the main concern relates to the high concentration of foreign ownership, predominantly originating from Serbia. In the Republic of North Macedonia, ownership rules in the audiovisual sector are highly restrictive, whereas such rules do not apply to digital media. Nevertheless, the regulatory authority oversees compliance with ownership regulations and merger procedures (Micevski & Trpevska, 2026). In Albania, only general competition rules apply, while in Serbia the Regulatory Authority for Electronic Media (audio-visual sector) and the ministry of information and telecommunications (print) assess the impact of mergers on media pluralism, although without a clearly defined methodology and primarily using only quantitative thresholds (Blagojev, 2026). None of the candidate countries have introduced a dedicated plurality test to evaluate the broader impact of mergers and acquisitions on media provision and pluralism. A particularly concerning development was recorded in Serbia, where numerous local media outlets were acquired ahead of local elections by a media company known for repeatedly breaching the Code of Ethics. These takeovers have undermined local news provision and weakened editorial independence, as the editorial policies of the acquired outlets reportedly changed following the acquisitions.¹³

The indicator **Plurality of digital markets** remains in the very-high risk band, as none of the candidate countries have adopted adequate legal provisions to ensure transparent and fair digital markets. At the same time, there is a significant lack of publicly available and reliable data in this area. No substantial changes have been recorded since last year. Candidate countries have still not transposed the EU Copyright Directive, and there are no agreements between media providers and digital intermediaries regarding compensation for media content.

Likewise, there are no ongoing discussions concerning remuneration from either digital platforms or AI companies for the use of media content. Candidate countries have also not introduced digital services taxes or global minimum taxation frameworks. However, in Montenegro, public consultations were launched in 2025 on a draft Law on Global Minimum Corporate Income Tax, while work also began on drafting a national AI strategy (Brkić Ružić, 2026). In Serbia, one interesting development occurred in May 2026, when a Cooper-

¹³ Obrenović, M. (2026a, March 24). Informer se širi Srbijom: Za potrebe lokalnih izbora, TV Lav plus postala regionalni propagandni centar. Cenzolovka. <https://www.cenzolovka.rs/drzava-i-mediji/informer-se-siri-srbijom-za-potrebe-lokalnih-izbora-tv-lav-plus-postala-regionalni-propagandni-centar/>

ation Protocol on the Development of a National Large Language Model was signed between the Office for IT and eGovernment and several institutions, including media organisations such as RTS, RTV, Tanjug news agency, and Politika.¹⁴ However, it remains unclear how quickly this project will develop, what level of quality it will achieve, and whether and to what extent participating media organisations may receive remuneration for the use of their content.

Media viability falls within the same medium-high risk band as in EU Member States, although candidate countries record a higher overall risk score. This reflects the broader crisis affecting the media sector, which in candidate countries is closely intertwined with strong political influence and pressure on the media. In the Republic of North Macedonia, for example, the local media market has been severely affected: the audiovisual sector is in decline, the number of local journalists is decreasing, and online media outlets do not receive subsidies (Micevski & Trpevska, 2026). In addition, the reduction of USAID support across the region in 2025 had a considerable negative impact on the media sector. By contrast, the latest numbers show improving revenues in the audiovisual, radio and print sectors, and an increase in the number of journalists in Montenegro, although data on revenues in the online media sector remain unavailable (Brkić Ružić, 2026).

Editorial independence from commercial and owner influence remains one of the most pressing issues affecting media markets across all candidate countries. Media outlets continue to be highly vulnerable to both business and political influence. In the Republic of North Macedonia, the lifting of the ban on state advertising has been criticised, as it may further increase political influence over the media and deepen media dependence on state funding (Micevski & Trpevska, 2026 citing Kevin & Trpevska, 2023). Although self-regulatory mech-

anisms provide some safeguards, they remain weak overall. Even where internal self-regulatory instruments exist, such as newsroom codes of ethics, they are often treated as formal requirements rather than genuinely binding professional standards. The separation between editorial and commercial interests is further undermined by the fact that media owners are frequently connected to businesses in non-media sectors and often fail to disclose conflicts of interest, a pattern observed across all candidate countries. In Albania, where this indicator was assessed the worst (very-high risk), it was highlighted that ‘media owners who support government policies receive subsidies for their non-media businesses through public contracts, PPPs, and strategic investment status’. (Likmeta & Voko, 2026, p. 24).

14 UNDP Serbia. (2026). Cooperation Protocol on the Development of a National Large Language Model. UNDP. <https://www.undp.org/serbia/news/cooperation-protocol-development-national-large-language-model>

Article 6(3) EMFA- Independence of editorial decisions

Challenges across candidate countries in this area are largely similar. Where regulatory and self-regulatory mechanisms exist, they are either poorly implemented or remain weak in practice. In Serbia, for example, internal ethical codes are formally required as part of the media registration process in the Media Register maintained by the Serbian Business Registers Agency. However, the Coalition for Media Freedom found, following a review of the Agency's database, that only a very small number of media outlets have complied with this obligation.¹⁵

In practice, pressure from political and economic centres of power is so intense that many media outlets either resort to self-censorship or ultimately cease operations altogether. Furthermore, in countries where public subsidies for media exist such as Serbia, state funding is often allocated to outlets that regularly violate professional and ethical standards, while independent and professional media struggle to compete in an unfair environment (Milutinović, 2026).

By contrast, in the Republic of North Macedonia, not-for-profit media outlets still appear to retain a greater degree of protection from corporate influence and commercial pressures (Micevski & Trpevska, 2026).

Recommendations

Candidate states should:

- Ensure that ownership transparency adequately covers all media sectors (audiovisual, print, and digital) and introduce transparency obligations for both media providers and media authorities, in line with the standards established by the EMFA.
- Ensure that financial data on media revenues is publicly accessible, transparent, and regularly updated.
- Ensure that regular evaluations of media concentration in the market and its effects on media pluralism are conducted covering all sectors, and that the impact of the digital sphere is included in these evaluations in line with the EMFA requirements.
- Strengthen the independence, institutional capacity, and operational effectiveness of national regulatory authorities.

- Develop regulatory frameworks that address the relationship between media and online platforms, including fair remuneration mechanisms in close cooperation with civil society organisations, media and journalists associations, representatives of academia and other stakeholders.
- Adhere stronger to self-regulatory safeguards protecting journalistic integrity and the integrity of media ownership should be further promoted and effectively enforced.
- Align the national legislation with the EU Copyright Directive.

National regulatory authorities should:

- Foster the introduction of transparent, unbiased and verifiable audience measurement systems and regularly collect media market, readership and audience data.
- Strengthen communication and cooperation with other relevant institutions and bodies, particularly those responsible for financial over-

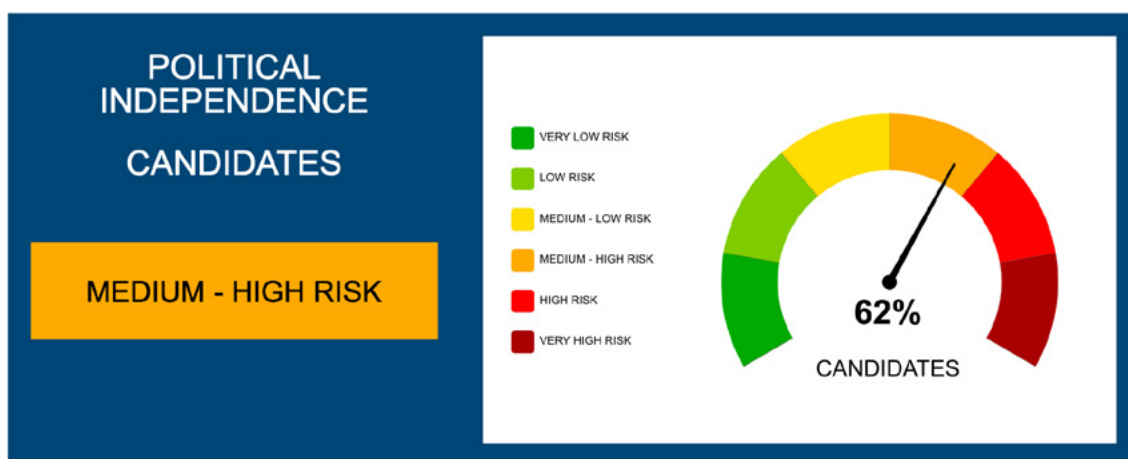
¹⁵ Danas. (2026). Coalition for Media Freedom: Why has the APR media database still not been aligned with the law? <https://www.danas.rs/vesti/drustvo/koalicija-za-slobodu-medija-zasto-baza-medija-apr-a-jos-uvek-nije-uskladjena-sa-zakonom>

sight, competition protection, and electronic communications, in the process of assessing media concentrations.

Media community and journalists' associations should:

- Strengthen and enforce self-regulatory mechanisms to protect journalists from commercial and ownership pressures, thereby reducing the risk of self-censorship.
- Media owners should disclose any potential conflicts of interest and refrain from influencing editorial policies in order to obtain subsidies to their non-media businesses.
- Media service providers should publish ownership information and advertising data to increase transparency and strengthen trust with their audiences.
- Establish a common negotiating framework between AI companies and media publishers.

6.3. Political Independence



The area of **Political Independence** in candidate countries is assessed as posing a medium-high risk. As already noted, political influence over the media remains a persistent problem in these countries, significantly undermining the ability of independent and professional media to fully perform their public interest role. Existing self-regulatory safeguards are too weak to effectively counter the strong political pressures exerted on the media sector. The worst-performing indicators are **Editorial autonomy** and **Political independence of the media**, both of which fall within the high-

risk category, with the situation being considerably worse than in the EU27, where these indicators are assessed as medium-low and medium-high risk respectively. Although the indicator **State regulation of resources and support to the media sector** records the lowest risk score within this area (medium-low risk), key issues—particularly the lack of transparency in state advertising—remain unresolved in most candidate countries.

Political independence of the media, the second highest-risk indicator, points to the severely compromised independence of media outlets in can-

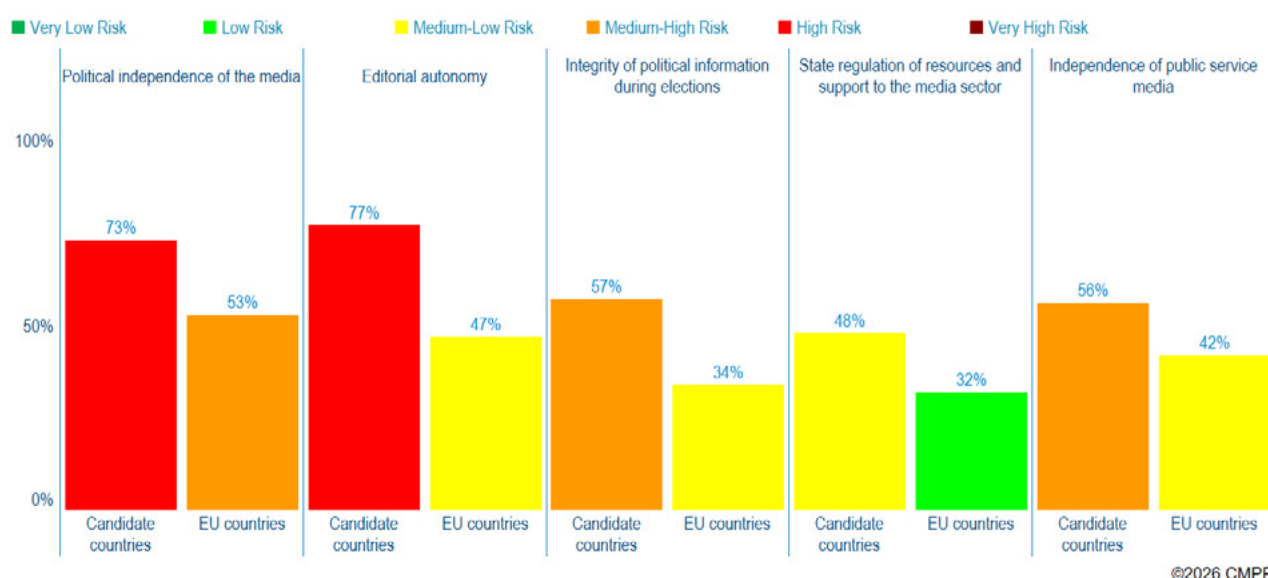


Figure 6.e. Risk per indicator for Political Independence area for candidate countries vs. EU Member States

candidate countries. Media are frequently subject to both direct and indirect political influence exerted through ownership means. In some cases, such influence is even publicly acknowledged. For example, in the Republic of North Macedonia, the director general of a national TV station (*Alfa TV*) stated that the purpose of the TV station is to support government policies as effectively as possible and that it is entirely legitimate for the owner to shape the editorial policy (Micevski & Trpevska, 2026 citing Prva TV, 2025). In Albania, ‘media ownership is leveraged for blackmail by owners seeking to gain licences or win tenders’ (Likmeta & Voko, 2026, p. 28 citing BIRN Albania & Global Media Registry, 2023). In Serbia, pressures on independent media became particularly visible in the case of United Media (UM), which owns several media outlets, after a leaked phone recording suggested the involvement of senior state officials in efforts to weaken the group and align its editorial policy with that of other politically captured media (Milutinović, 2026 citing MFRR, 2025). Even in Montenegro (with the lowest, yet still medium-low risk score), serious concerns regarding foreign influence over the media sector have been raised. Four out of five commercial broadcasters are majority or fully owned by Serbian businesses or political centres allegedly seeking to influence editorial policies in line with foreign political interests (Brkić Ružić, 2026 citing Article 19, 2025).

The indicator **Editorial Autonomy** demonstrates the very limited effectiveness of both internal and external self-regulatory mechanisms across candidate countries. Press councils generally exercise little influence, while public awareness of their existence and role remains low. Violations of professional and ethical standards are widespread. As Milutinović (2026, p. 36) notes, ‘Serbia’s self-regulatory instruments exist largely on paper’. A similar situation can be observed in most candidate countries. In the Republic of North Macedonia, internal codes of ethics are largely absent.

Furthermore, there is a lack of effective legal or

self-regulatory safeguards to ensure editorial independence, particularly regarding the appointment and dismissal of editors-in-chief. Even where such safeguards formally exist, as in Montenegro, their practical effectiveness has yet to be fully assessed. According to Micevski & Trpevska (2026), amendments to the Law on Media adopted in 2014 in the Republic of North Macedonia weakened previously existing provisions that had established binding guarantees aimed at protecting editorial independence from external pressures.

In 2025, elections were held in all candidate countries, including local elections in the Republic of North Macedonia, local elections in several municipalities in Montenegro and Serbia, and parliamentary elections in Albania. The indicator **Integrity of political information during elections** is assessed as posing a medium-high risk. Across all candidate countries, researchers noted biased media coverage during electoral campaigns and a lack of equal representation.

In Montenegro, the situation was somewhat better in public service media than in commercial media, similar to the previous year. In Serbia, despite the existence of relevant regulation—and partly due to the prolonged dysfunction of the media regulator REM—audiovisual content was ‘marked by misleading political advertising, hate speech, and the suppression of pluralism. Local issues were largely sidelined, with many stations airing pre-recorded party materials that were not clearly distinguished from regular news programming’ (Milutinović, 2026, p. 37). This development should also be viewed in the context of the previously mentioned acquisition of local media outlets by a government-affiliated media company ahead of the elections.¹⁶ The online sphere, meanwhile, remains largely unregulated. Although political parties in Albania adopted a Code of Conduct on Digital Campaigns in 2025 as a form of self-regulation, numerous violations were still recorded, including unlabelled political advertisements, third-party and bot-driven amplification activities, and campaign-

16 Obrenović, M. (2026b, January 20). Masovna kupovina medija u gradovima u kojima se pripremaju lokalni izbori. Cenzolovka. <https://www.cenzolovka.rs/drzava-i-mediji/masovna-kupovina-medija-u-gradovima-u-kojima-se-pripremaju-lokalni-izbori/>

ing during the electoral silence period (Likmeta & Voko, 2026 citing BIRN Albania et al., 2025).

Equal conditions for paid political advertising, particularly for online media, remain a major issue across candidate countries. Moreover, limited regulatory frameworks are in place to effectively ensure the transparency and equal opportunities of political advertising on online platforms. In the Republic of North Macedonia, some foreign online media outlets reportedly received state funding for electoral advertising, raising concerns that '[t]he current system of state funding for campaign advertising increases media dependence on state subsidies and does not prevent abuse by online news portals established only during the campaign and serving to channel state funds to parties' (Micevski & Trpevska, 2026, p. 35 citing Dimeska, 2025 & ODIHR 2024). Some regulation exists in Montenegro; however, it is limited to monitoring advertising on Facebook and Instagram, thereby, not ensuring full transparency (Brkić Ružić, 2026).

As regards the indicator **State regulation of resources and support to the media sector**, it records the lowest risk assessment within this area,

falling into the medium-low risk category. Montenegro, which achieved the most favourable assessment (low risk), introduced several improvements following the adoption of new media laws. These include a reduced VAT rate for print media and a Fund for Encouraging Media Pluralism and Diversity. In Albania, although there are no direct state subsidies for media, outlets continue to benefit from various forms of indirect support, such as rental subsidies for example. In the Republic of North Macedonia, subsidies remain very limited and are provided only to print media.

Finally, the indicator **Independence of public service media** is assessed as posing a medium-high risk, indicating that public service media (PSM) across all candidate countries remain in a challenging position. In each of these countries, political influence is particularly evident in the appointment processes for PSM boards and general managers. This in turn, contributes to a widespread public perception of limited independence and persistent political pressure on public broadcasters, as observed, for example, in Montenegro (Brkić Ružić, 2026 citing CCE, 2025) while also affecting the plurality and diversity of media content.

Article 25 EMFA - Allocation of public funds for state advertising and supply or service contracts

With regard to state advertising, even Montenegro continues to face weak implementation of transparency rules governing the allocation of state advertising funds. Although certain rules formally exist, their implementation remains partial, while sanctions for non-compliance have still not been applied (Brkić Ružić, 2026). Following the reintroduction of state advertising in the Republic of North Macedonia, it has already become evident at the local level that these funds are distributed without clear criteria and that media outlets maintain informal arrangements with local municipalities (Micevski & Trpevska, 2026). Similar trends can also be observed in Albania and Serbia. In Serbia, an analysis of state advertising allocation practices in eight municipalities showed the absence of clear, transparent, non-discriminatory, and proportionate criteria for the distribution of funds, as well as a lack of adequate oversight mechanisms in line with Article 25 of the EMFA (Blagojev et al., 2026). Certain exemption provisions within the Public Procurement Law allow local self-governments to allocate funds to media outlets without transparent procedures or clearly defined rules. As a result, public funds are frequently directed towards media outlets that are less critical of the government (Milutinović, 2026 citing Cenzolovka 2025). Across candidate countries, online state advertising continues to be distributed without sufficient transparency.

Issues related to insufficient funding of public service media are particularly concerning in Serbia (very-high risk), where financial dependency also undermines editorial independence. This is especially evident in the negligible coverage by the public broadcaster of the mass student protests that are still gripping the country (Milutinović, 2026 citing NSSJ & Birodi, 2025). In Albania, meanwhile, the public service broadcaster faces a difficult financial situation due to hundreds of unlawfully dismissed employees who successfully pursued legal action against the PSM (Likmeta & Voko, 2026). As stated in an analysis prepared for a group of Serbian media and journalists' organisations, 'the priority for achieving the objectives [related to PSM] set out by EMFA is the consistent application of the already established framework, rather than new amendments to laws that have, in any case, been amended numerous times'. (Stojković, 2026, p. 15).

Recommendations

Candidate states should:

- Ensure that anti-corruption bodies effectively investigate relationships and potential conflicts of interest between media owners and political actors.
- Ensure that the appointment of public service media directors-general and board members is conducted in a transparent and merit-based manner, free from political influence.
- Ensure that funding of PSM is adequate, sustainable and predictable.
- Ensure that the distribution of state advertising is based on fair and transparent criteria, and in line with Article 25 of the EMFA.
- Prohibit the misuse of public office and official functions for campaigning purposes during election periods.
- Adopt regulations governing online political advertising and for political actors to ensure full transparency regarding the financial costs incurred.

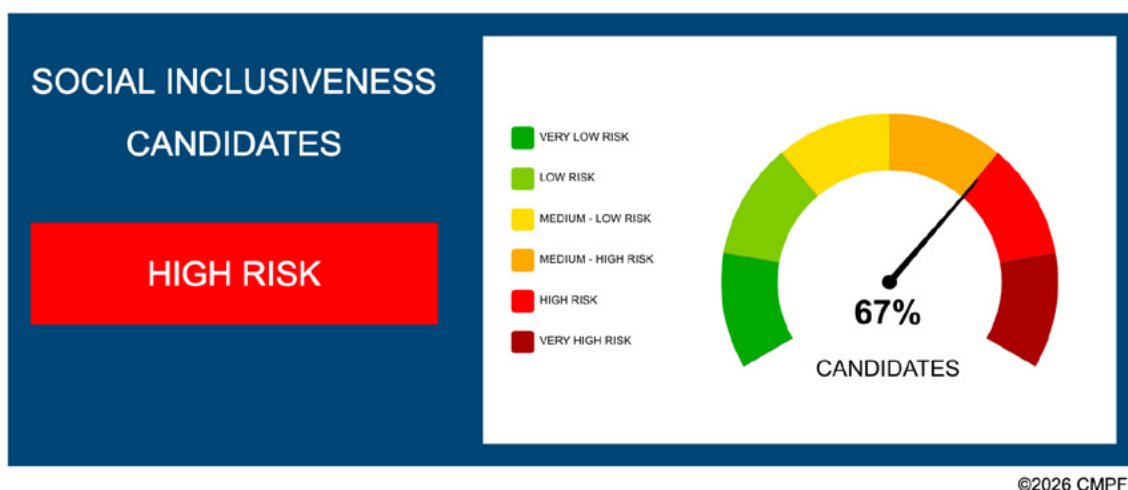
National regulatory authorities should:

- Introduce regular independent monitoring and analysis of the objectivity and impartiality of news and current affairs programmes on PSM, major television and radio channels.

Media community and journalists' associations should:

- Strengthen safeguards against political and commercial interference by reinforcing effective self-regulatory mechanisms both at the industry level and within media organisations in all sectors in line with the new EU legislation (e.g., the EMFA).
- Ensure the effective implementation and enforcement of equal representation of all political actors during electoral campaigns across both public service and mainstream media.
- Conduct independent monitoring and analysis of the effectiveness of self-regulatory mechanisms, propose and implement measures to improve their functioning, and strengthen the capacity and financial sustainability of self-regulatory bodies in line with new EU legislation, including the EMFA.
- Monitor the work of national regulatory authorities to ensure transparency, accountability, and effective oversight.

6.4. Social Inclusiveness



Social Inclusiveness is another area assessed as posing a high risk in candidate countries, lying close to the threshold between the high and medium-high-risk categories. Compared to the average score of EU Member States, candidate countries score two risk bands higher, indicating significant challenges related to access to information for specific social groups, local media provision, media literacy development, and the prevalence of hate speech. The highest levels of risk are recorded for the indicators **Media literacy** and **Cultural and linguistic diversity in the media**, both of which fall

within the high-risk category. All other indicators, **Gender equality in the media**, **Local/regional and community media**, and **Universal and inclusive access to media**, are assessed as posing a medium-high risk.

The indicator **Universal and inclusive access to media** is assessed as posing a medium-high risk. With regard to the universality of public service media (PSM), the most progress has been recorded in Montenegro, where accessibility levels are comparatively high and further online development was observed in 2025. By contrast, in the Republic of

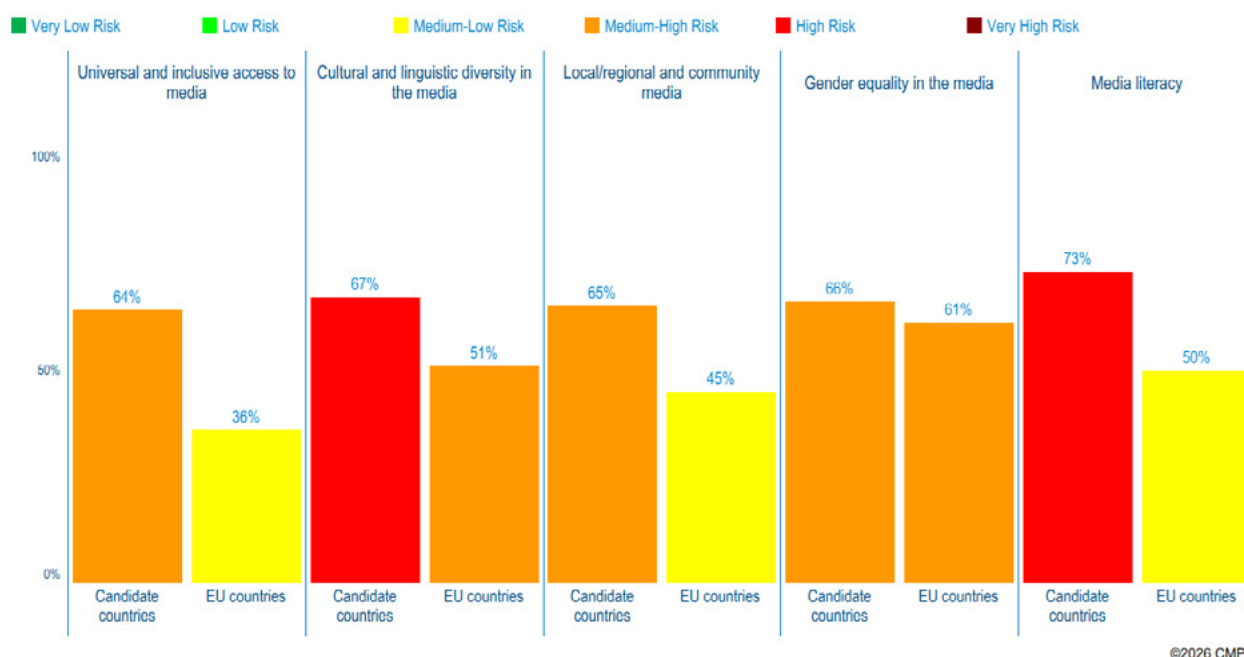


Figure 6.f. Risk per indicator for Social Inclusiveness area for candidate countries vs. EU Member States

North Macedonia, PSM content on online platforms remains limited, while the broadcaster has no legal obligation to regularly produce and distribute online content (Micevski & Trpevska, 2026). In Serbia and Montenegro, public service media remain the main, though still insufficient, providers of accessible media content.

In Albania and the Republic of North Macedonia, however, only a small proportion of programmes on national broadcasters are accessible to persons with disabilities. In Albania, the regulatory authority has taken steps to promote compliance in this area, although these efforts remain limited (Likmeta & Voko, 2026 citing Albanian Parliament, 2025). In the Republic of North Macedonia during the 2025 local elections, most local television stations provided sign language interpretation in their news programmes (Micevski & Trpevska, 2026 citing AAVMS, 2025c).

The **Cultural and linguistic diversity in the media** indicator, which has been slightly adapted and now covers issues related to legally recognised minorities, cultural and linguistic diversity and the combating of hate speech, falls within the high-risk category. The findings show that diversity policies, particularly in the private media sector, remain underdeveloped across candidate countries, while news content in minority languages is scarce among commercial media service providers. According to Micevski & Trpevska (2026) a particularly concerning situation exists in the Republic of North Macedonia, where only 17 media outlets are licensed to broadcast in minority languages. In Serbia, minority media outlets may be established by national minority councils and are subject to the same public interest obligations as public service media. However, due to their institutional and financial dependence on national minority councils, these outlets remain vulnerable to political influence (Milutinović, 2026).

One of the most pressing challenges within this indicator remains the widespread presence of hate speech, which extends beyond the online realm and is present in audiovisual media in some countries,

particularly Albania and Serbia. Efforts to combat hate speech are generally slow and ineffective. In Albania, the LGBT+ community and women are especially targeted. Another source of online hate speech in Montenegro are unregistered portals with unclear ownership structures and missing masthead (Radulović, 2025). Some positive developments have nevertheless been recorded in Montenegro, where the broadcast regulator—now equipped with sanctioning powers—issued six warnings and two fines of 500 euros for breaches of anti-discrimination standards (Brkić Ružić, 2026 citing AAMS, 2026).

In Albania, the audiovisual regulator AMA reached agreements with X and TikTok to act as a trusted actor for reporting cases of hate speech and disinformation. However, during 2025, AMA reported only one case to X (a platform rarely used in Albania) while problematic content on TikTok was largely absent due to the one-year ban imposed on the platform (Likmeta & Voko, 2026). In the Republic of North Macedonia, the Network for Combating Hate Speech was established, but later became inactive, primarily due to the lack of donor support (Micevski & Trpevska, 2026).

The indicator **Local/regional and community media** is assessed as posing a medium-high risk and highlights the numerous challenges faced by local, regional and community media across candidate countries. Community media are either virtually non-existent, as in Montenegro, or, where they do exist, remain underdeveloped and financially strained. The withdrawal of USAID funding further contributed to the crisis affecting local media markets throughout the region. Montenegro is the only country assessed as low risk, primarily because local public broadcasters benefit from secured financing, while a number of local commercial media outlets also continue to operate. Nevertheless, the quality of local media content varies, although Montenegro remains one of the few countries that provides detailed data on content at the local level (Brkić Ružić, 2026).

By contrast, the most severe situation for local and regional media has been identified in the Republic of North Macedonia, where the media regulator itself acknowledged the urgent need to introduce support measures for local and regional broadcasters due to the deep crisis affecting the sector (Micevski & Trpevska, 2026 citing AAVMS, 2025h). In Serbia, many local media outlets remain under direct or indirect political control, while recent acquisitions ahead of local elections of numerous local outlets by a media company known for repeatedly violating the Code of Ethics indicate an even greater concentration of media ownership and local influence (Milutinović, 2026). Unfortunately, due to the broader structural and financial difficulties faced by public service media at the national level, PSMs in most candidate countries, with the exception of Montenegro, are not considered capable of adequately addressing the critical information needs of local communities.

The **Gender equality in the media** indicator does not significantly differ from the situation observed in EU Member States and remains within the medium-high risk category. Women continue to be underrepresented both in leadership positions and in news and current affairs programmes across all candidate countries. Gender imbalance was particularly visible during electoral campaigns in Albania (Likmeta & Voko, 2026 citing BIRN Albania & EDM, 2025). The position of women in managerial roles within local media is especially fragile as their challenges tend to receive less public attention, while the pressures and attacks they face are often more direct and personal. In Serbia, Milutinović (2026, p. 49, citing Local Press, 2025) notes that ‘[f]acing pressures in editorial offices and, at times, losing their jobs in local [media], many women establish their own media organizations, securing autonomy and greater editorial freedom’.

Finally, the indicator **Media literacy** records the highest level of risk among all indicators in this area for candidate countries. Comprehensive strategies aimed at improving media literacy remain

largely absent, while responsibility for initiatives in this field continue to fall predominantly on civil society organisations rather than state institutions. The withdrawal of USAID funding has once again had a significant negative impact on activities in this area. Media literacy is still not part of compulsory education curricula in almost all candidate countries, with the Republic of North Macedonia representing a partial exception. Audiovisual media service providers and video-sharing platforms also rarely undertake initiatives aimed at strengthening media literacy. Only Montenegro and the Republic of North Macedonia have introduced initiatives specifically targeting vulnerable groups, while the Montenegrin regulator has also begun outreach activities to promote media literacy among these groups (Brkić Ružić, 2026 citing AMU, 2025f). In Albania, for example, the primary focus remains on the development of digital skills rather than broader media literacy competencies.

Recommendations

EU institutions should:

- When assessing media concentrations, particular attention should be paid to local and regional concentrations as they might have a detrimental effect on local public interest information. This is especially true in candidate countries.

Candidate states should:

- Ensure the adequate development and implementation of mechanisms and legal frameworks aimed at combating online hate speech. In addition, create effective mechanisms to prevent and address hate speech originating from public officials.
- Ensure that media accessibility for persons with disabilities is improved through the effective enforcement of legal provisions and minimum accessibility standards.
- Ensure greater representation of minority groups in both public and private media.

- Foster the adoption of gender equality policies in the media sector, addressing both employment practices and the diversity of media content.
- Ensure the independence of local and regional media, while providing fair and transparent financial support aimed at strengthening their sustainability.
- Strengthen citizens' media literacy capacities through comprehensive strategic activities that reach the wider public, all social groups, and particularly vulnerable communities.

National regulatory authorities should:

- Closely monitor compliance with media accessibility standards for less dominant groups in society, establishing clear benchmarks, and consistently enforce penalties in cases of non-compliance.
- Increase cooperation with self-regulatory bodies, recognising their role in strengthening ethical standards and combating hate speech in both traditional media and online environments.
- Gather comprehensive quantitative data on local media markets, including the revenues of regional, local, and community media, as well as audience research on readership, viewership, and listenership.

Media community and journalists' organisations should:

- Develop inclusive editorial policies that both improve the representation of diverse communities in media coverage and encourage the participation of diverse community members in news production.
- Continuously organise training programmes aimed at improving reporting on minority and vulnerable groups.

All relevant stakeholders should:

- Support research on the challenges facing local media and the emergence of news deserts in candidate countries.
- Develop support mechanisms to ensure that VLOPs and VSPs take a more proactive role in combating online hate speech, tailored to the specific contexts of candidate countries, which are not part of the Digital Single Market.

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Annexe 1

Methodology

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

1. MPM Questionnaire

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

- **Fundamental Protection.** This area considers the necessary preconditions for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression; the right to seek, receive and impart reliable and accurate information, including the right to access information and the protection of information integrity; favourable conditions for the free and independent conduct of journalistic work; and the independence and effectiveness of national regulatory authorities.
- **Market Plurality.** This area considers the economic dimension of media pluralism, to assess the capacity of the market to provide a plurality of independent information sources, and to favour consumption diversity. It evaluates the risks related to: lack of transparency of
- media ownership; the regulatory framework to protect plurality and diversity of media offer, and the level of concentration of media ownership; the level of concentration in the distribution and access to the media, with a specific indicator on digital intermediaries, such as search engines, social media and other algorithmic aggregators; threats to the economic sustainability of the media; and the influence of commercial and owners’ interests on editorial content.
- **Political Independence.** This area is designed to evaluate the risks of the politicisation of the distribution of resources to the media; political interference with media organisations and news-making; and political interference with the public service media. Further, it looks at the availability of safeguards against manipulative practices in political advertising in audiovisual media and on online platforms (including social media), as well as considering the availability and effectiveness of self-regulation.
- **Social Inclusiveness.** This area assesses whether media access is universal and inclusive. Different social groups’ access to the media is a key aspect of a participatory media system, and it is a core element of media pluralism. Therefore, this area examines whether all population groups—including minorities, local/regional communities, people with disabilities, and women—have adequate and meaningful access to news media content. Media literacy, as a precondition for using the media effectively, is also assessed in this area.

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

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

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

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

Variables can either:

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

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

Data used to fill the MPM questionnaire. The MPM is informed by both primary and secondary sources, which are collected by national country teams. The sources used by the country teams include: national laws, case law, governmental documents, NGO reports, official statistics, commercial sources/financial reporting, and academic research. When comprehensive, EU-wide data are available for a given variable (for example, through Eurostat surveys), they are preferred. The CMPF suggests that the country teams use a common dataset in their assessments to ensure that answers are more comparable across countries. The data described above are supplemented with primary data, gathered through interviews and analysis of legal, academic and other texts, together with the Group of Experts' evaluation (see below) for variables that are more difficult to measure, and/or that require a qualitative type of measurement, and/or that have shown a lack of measurable and easily verifiable data. The combination of primary and secondary data has proven to be a useful and effective approach to ensuring reliable and valid findings in the context of this project.

The MPM questionnaire is reviewed every year by the CMPF team. For the MPM2026, the CMPF team has updated the MPM questionnaire, taking into account several factors including regulatory novelties, social changes, the results of previous data collection, and newly available data. To this end, this year, the CMPF team employed several statistical methods including a correlation analysis of variable pairings and Intraclass Correlation Coefficient (ICC) to double-check the methodological robustness and validity of the questionnaire. Correlation analysis of variable pairs was used to help identify potential redundancy between variables. If two variables exhibit a very strong correlation, this indicates substantial conceptual overlap between them, making them possible candidates for removal. ICC was used to gauge how stable a variable's scores are within a given country over time. A high ICC score indicates that a variable tends to produce consistent scores over time, making it a possible suitable candidate for removal from the set of more diffi-

cult variables assessed by the Group of Experts. All the changes for this 2026 implementation are described in section 5.4. The full questionnaire can be accessed [here](#).

2. Data Collection

Step 1 - Data collection by the country teams.

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

The composition of the countries teams for the MPM 2026 are available [here](#). In an effort to ensure continuity, and therefore improve comparability, most of the country teams remained unchanged. For Finland, in this edition of the MPM, the data collection was carried out directly by the CMPF team.

Step 2 - Internal peer-review of the data collection by the CMPF team.

Once the country teams have completed the data collection, the CMPF team checks the quality and consistency of the data collected through the questionnaire, making sure that:

- 1) the methodology has been respected for each

variable, 2) the answer provided by the country team is sufficiently sourced, and 3) the risk evaluation proposed by the country team is comparable between countries and across years.

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

1. Group of experts. The Group of Experts, composed of national stakeholders and experts, provides a peer-review of the answers provided by the country team for a selection of particularly sensitive and complex variables. The variables submitted to the Group of Experts either require a qualitative type of measurement or need answers that cannot be based on measurable and easily verifiable data. Based on the review provided by the Group of Experts, the country teams either decide to confirm or modify their initial assessments.

2. External peer-review. For a list of selected countries, the full data collection is independently peer-reviewed by a leading media scholar in the concerned country. The procedure aims to maximise the accuracy of the monitoring. In these cases, neither the data collection nor the country reports necessarily reflect the views of the peer-reviewer. However, the peer-reviewer acknowledges that there is enough empirical evidence to justify the risk assessment. The country reports that are submitted to this external peer-review may change every year and are selected in such a way that they represent all the different European regions. Countries are selected for peer review for at least one of the following three reasons: 1) a quickly evolving situation during the year studied, 2) a change of country team, and, 3) the presence of a high-risk evaluation in the previous MPM country reports. In seldom cases, if there is a disagreement between the reviewers and the CMPF, the decision of the latter—after an in-depth internal review process—prevails.

3. MPM Calibration

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

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

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

Each variable receives a score from 0 to 1, according to the answer provided by the country team. Scores closer to 0 indicate a low-risk assessment, while those closer to 1 indicate an assessment of high risk. Dichotomous variables with a yes/no reply are rated 0 or 1. Polychotomous variables with three-option replies are rated 0/0.5/1, where low risk is associated with 0, medium risk with 0.5, and high risk with 1. For variables with numerical values, the answer provided by the country team is formally translated into a level of risk (low, medium, high), using thresholds that are defined on existing standards (e.g. the European Union, the Council of Europe or the United Nations), or based on percentile scores.

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

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

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

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

Generally, to determine a risk level, the following procedure was applied: if a country team provided an interpretation of the lack of data, then the CMPF followed this suggestion and coded it accordingly as “no data”, with either a low or a high-risk value. In cases where the absence of data cannot be explained, the following criteria were considered:

- Taking into account the local context: where the data were not collected because they were considered to be of limited interest (e.g., because the country is too small to collect detailed information on a given issue; because a particular medium has a very limited reach), then a “low risk” value was assigned.
- If there was an evasion of a legal requirement to collect the lacking data, then a “high risk” value was assigned.

- The number of “missing data” values was limited as much as possible, and was adopted only as a residual category in cases where comments that evaluated the reason behind the lack of data were missing, were incomplete, or were impossible to interpret.
- The “very low risk” and “very high risk” options have been in place since the 2020 MPM implementation for the **Market Plurality** area only. The rationale is the following. Lack of data is a major threat both for transparency and contestability of the markets as it forbids the implementation of regulatory remedies or of policy measures to safeguard media pluralism. In those cases, coding the lack of data as “high risk” would have caused the countries with no data having better results in comparison to the countries that have data showing a high level of concentration. To avoid this paradoxical outcome, as well as to take into account the relevance of having transparent market data, the “very high risk” option to code No Data for Market is used when applicable.

No data for the Market Plurality area. In the Market Plurality area, the MPM questionnaire asks for numeric values to assess concentration in the indicator on **Plurality of Media Providers** (Top4 indexes measured on market and audience shares for horizontal concentration in audiovisual, radio, newspaper sector; Top4 index measured on audience share in the online sector; Top4 index measured on market share for cross-media concentration), and in the indicator on **Plurality in Digital Markets** (specifically, in the sub-indicator on online platform concentration: Top4 index in the online advertising market and in total digital audience). Moreover, economic data are requested to assess media viability, on revenues and employment. The availability of these data is a condition for the market to be transparent and open and is a precondition of any intervention to protect or restore external pluralism, and on which to base public support for the media sector, if necessary. For these reasons, the evaluation of the lack of data in the **Market Plurality** area follows additional guidelines.

a. Indicators on **Plurality of media providers** and **Plurality in digital markets**. When the questionnaire asks both for market and audience concentration, the following actions occur:

- If country data on audiences are available, but those on revenue shares are not, or vice versa, the variable with a “No data” answer is given a “missing data” value, meaning that the findings are based exclusively on the available variable. In other words, the missing data is considered to be optional, as audience measurement or revenue measurement alone are sufficient to assess the market concentration.
- If the country produces neither data on the audience nor the revenue shares, the lack of data for revenue shares is coded as “very high risk”, and the lack of audience share data as “missing data”. When the questionnaire only asks for audience or market concentration (variables on online media and on cross-media concentration), the lack of data is coded as high risk.

b. Indicator on **Media viability**:

Concerning the sub-indicator on *revenue trends*, the MPM aims to assess the economic trends in the year of implementation. Considering that official primary data may not be available at the time of the data collection, other sources (research, commercial industry, stakeholders’ associations) can be used by the country teams to provide an estimate of the economic trends, under the CMPF’s supervision. The lack of data is consequently evaluated by taking into account the national context (e.g., whether they are not yet available at the time of the data collection or are permanently unavailable; or if the sector lacking data is not relevant in the country, e.g., the local media in a very small country; the transparency of the advertising market, and so on). Up until 2024, the decision was made to neutralise the lack of data in the case of the revenues of the digital segment, as this was considered a new segment that was in need of a new data collection practice. Since

the MPM2026, however, the lack of revenue data for digital natives has been coded as high risk.

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

4. MPM Aggregation Method

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

Risk assessment system. Since the MPM2026, the risk assessment has been measured according to a six-tier system, as follows.

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

The assessment system was reviewed in 2025 and was expanded from a three-tier to a six-tier system

(see Figure 1). The adoption of the six-tier system aimed to provide a more granular assessment of the risk to media pluralism and freedom. This increased granularity also aimed to shift the reporting from a percentage-based risk evaluation to a risk-band evaluation, which allows more comparability over the years, given the constant changes of the MPM questionnaire.

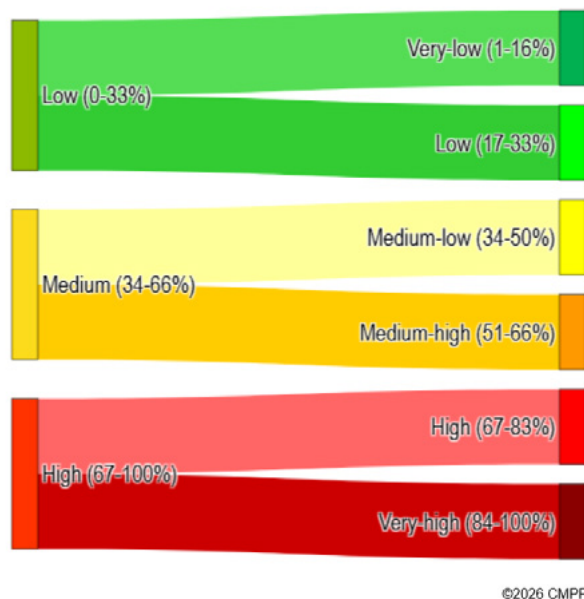


Figure 1 - Change from the three-tier system (applied in the MPM implementation before 2025) to a six-tier system of evaluation of risk levels (since MPM2026)

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

$$R_{si} = \frac{\sum (\bar{R}_t \cdot \sqrt{n_t})}{\sum W_t}$$

\bar{R}_t is the average risk score for variable type t ,

n_t is the number of variables of type t ,

$W_t = \sqrt{n_t}$ is the weight for variable type t .

The formula has been used since the MPM2025 implementation to apply the square root of the number of variables per type within each sub-in-

dicator. Given the fluctuating number of variables per sub-indicator, this step creates a more uniform weighting per variable, ensuring that variable types that are more numerous per sub-indicator are not under-weighted, and variable types that are less numerous are not over-weighted, while maintaining the L/S/E logic of the MPM.

The final risk score per sub-indicator is presented as a percentage score, e.g., a score of 0.46 is presented as a risk of 46%. Each score is rounded to hundredths. If the digit at the hundredth place is equal or superior to 5, the risk level is rounded up. If the digit of the hundredth place is inferior to 5, the risk level is rounded down. For example, a score of 0.46666 will be rounded to 0.47 or 47%, while a risk level at 0.463333 will be rounded down to 0.46 or 46%.

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

Specificity of the Market Plurality area – Indicator: Plurality of media providers. Since the MPM2026 implementation, the formula used to calculate the risk score for the indicator **Plurality of media providers** is slightly different to the formula used for other indicators. It includes an *ad hoc* weighing of some of the sub-indicators based on media consumption. This choice was made to ensure that media sectors with higher audience shares have a greater impact on the final score.

This is calculated according to the following formula below.

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

- IR_PMP represents Indicator risk level for **Plurality of media providers**,
- j represents media sector,
- C represents media consumption.

Four of the sub-indicators—namely ‘*media ownership concentration – AVMS*’, ‘*media ownership concentration – radio*’, ‘*media ownership concentration – newspapers*’ and ‘*media ownership concentration – digital*’—were weighted according to media consumption trends in a given country, using data from the Consumer survey supporting the 2025 European Media Industry Outlook report.¹ The two remaining sub-indicators, that is, ‘*media ownership concentration – regulatory safeguards*’ and ‘*cross-media ownership concentration*’, have a default weight of 1.

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

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

Calculation of the overall assessment. The risk level associated with areas is calculated on the simple mean of the rounded area scores. All the results are presented in the final report as rounded percentage scores.

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

5. Changes to the MPM 2026 Questionnaire

In the MPM2026, some changes were implemented by the CMPF. This was to best align the questionnaire with the new set of regulatory instruments available at the EU level: from the European Media Freedom Act to the Regulation on the Targeting and Transparency of Political Advertising.

A description of the main differences, compared to the MPM2026 questionnaire, is given below.

Fundamental Protection

Until MPM2024, the five indicators that made up the Fundamental Protection area were: 1) Protection of freedom of expression; 2) Protection of the right to information; 3) Journalistic profession, standards and protection; 4) Independence and effectiveness of the media authority; and 5) Universal reach of traditional media and access to the Internet. Since MPM2026, these have been as follows: 1) Protection of freedom of expression; 2) Protection of information integrity; 3) Protection of the right to information; 4) Journalistic profession, standards and protection; and 5) Independence and effectiveness of the national regulatory authorities.

Some minor updates took place in the MPM2026 questionnaire regarding the Fundamental Protection area.

¹ European Commission (2025, 4 September). *Shaping Europe’s digital future. Consumer survey supporting the 2025 European Media Industry Outlook report* <https://digital-strategy.ec.europa.eu/en/library/consumer-survey-supporting-2025-european-media-industry-outlook-report>

Indicator	Changes	Rationale
Protection of freedom of expression	Amendment of Variable 5 (MPM2026): “Is freedom of expression respected in practice in your country?”	Protection of freedom of expression in a given country, with regards to watchdogs other than journalists (e.g. activists, members of civil society organisations, academicians), as freedom of the press is assessed throughout the whole area already. The amendment aims to assess the context in which freedom of the press is exercised, and Variable 5 for MPM2026 reads as follows: ‘Is freedom of expression towards activists, academicians, human rights defenders respected in practice in your country?’
Protection of information integrity	<p>Only minor changes and clarifications have been made in this indicator. Variable 14. was simplified to ‘Do public authorities request content moderation measures from online platforms in a manner that respects freedom of expression?’ The components on ISPs and the management of network traffic were removed.</p> <p>Variable 13 only considers dispute resolution mechanisms that are available also for content that was published in the country’s national language. Variable 17 on counter-disinformation strategies emphasises that the relevant policy tools do not need to be formalised or called a “strategy”, as long as they achieve the intended goal. Variable 18 on independent initiatives to monitor and debunk disinformation, cannot be considered low risk if the country exclusively relies on EU-funded projects and EU-initiatives.</p>	The clarifications were made in order to have objective scoring criteria and minimise misunderstanding.
Journalistic profession, standards and protection	Amendment for Variable 35, ‘Are perpetrators of crimes against journalists prosecuted?’	The word “crimes” has been substituted with “attacks”, in order to catch a wider range of actions against journalists. (i.e. ‘Are perpetrators of attacks against journalists prosecuted?’). Additionally, the description of the variable now clarifies: “When the attack is perpetrated by an anonymous subject (e.g. online or non-identifiable police officer), please consider scoring no data--> high risk. The answer should be “Not applicable” only when there are no attacks at all and hence, nothing to be investigated, nobody to be prosecuted”.
	The knowledge of cases of usage of spyware technologies against journalists was assessed in Variable 33 (online threats and attacks).	The country teams are now required to assess the knowledge of spyware cases in Variable 37 (‘Is the safety of journalistic sources protected in practice?’).

Market Plurality

The **Market Plurality** area presents the same structure for the MPM2026 as regards the indicators. The changes introduced in MPM2026 occurred at sub-indicator and variables level, and they are related to the need to take into account the EMFA regulation and the impact of AI on the economic environ-

ment and the media. This includes: 1) **Transparency of Media Ownership**: (...), and 2) **Plurality in Digital Markets**: a new variable on the audience measurement systems, and fine-tuning of the variables assessing the state of economic relationship between publishers and platforms/Generative AI companies.

Indicator	Changes	Rationale
Transparency of media ownership	<p>The number of variables has been reduced from 12 to 8. Additionally, only one of the previous variables has been maintained: former Variable 54, which has now been renumbered as Variable 57.</p> <p>The number of subindicators has been reduced from 3 to 2. These 2 subindicators are new: ‘Disclosure of media ownership by media service providers’ and ‘National media ownership databases’, each containing 4 variables.</p>	The complete restructuring of this indicator is due to the applicability of the EMFA starting in August 2025. Article 6 EMFA introduces new obligations for media service providers and Member States regarding the disclosure of media ownership information and the creation of media ownership databases. Therefore, the changes and new variables introduced reflect the obligations set out in Article 6 of the EMFA.
Subindicator “Disclosure of media ownership by media service providers”	<p>New. Variable 51:</p> <p>Does national law have a system to ensure that media service providers make ownership information easily accessible to their audience?</p>	Given the full application of the EMFA from 8 August 2025, the assessment should now focus on the steps taken by Member States to implement Article 6(1), including mechanisms to ensure its effective enforcement.
	<p>New. Variable 52: Does this system impose sanctions on media service providers that fail to make ownership information accessible to their audience?</p>	This is a follow-up variable, based on the rationale of the previous one.
	<p>New. Variable 53: Are the sanctions effective and applied in practice?</p>	This is a follow-up variable, based on the rationale of the previous ones.
	<p>New. Variable 54: Do media service providers effectively make up-to-date ownership information easily and directly accessible to the recipients of their services?</p>	<p>This variable does not build upon the previous ones. Instead, it requires an on-the-ground evaluation to determine whether media service providers are effectively providing the information specified in points (a) to (d) of Article 6(1) EMFA to the recipients of their services.</p> <p>To conduct this assessment, researchers are required to use as a proxy the leading media service providers in their country, based on audience size (up to the top 4 in the audience ranking) across different sectors (print, radio, TV, and digital-native outlets).</p>

Subindicator “National media ownership databases”	New. Variable 55: Has your country entrusted a national regulatory authority or body with the development of a national media ownership database?	This variable assesses whether Member States have assigned a national regulatory authority or body the responsibility for developing a national media ownership database, as required by Article 6(2) EMFA. The variable also assesses whether the database has been developed.
	New. Variable 56: Does such a national media ownership database contain sufficient and meaningful information on the ownership of media service providers?	This variable does not build on the previous one. Instead, it requires an on-the-ground evaluation to determine whether the developed media ownership database contains at least the information on media service providers required by Article 6(1) EMFA.
	Variable 57 (Formerly, Variable 54): Does national law include specific provisions requiring financial reporting obligations for the media sector?	This variable assesses whether there are media-specific regulations requiring the disclosure of financial information from media service providers that goes beyond the requirements set out in point (d) of Article 6(1) EMFA. Specifically, this refers to the total annual amount of public funds allocated for state advertising and the total annual advertising revenues received from third-country public authorities or entities. Such additional information may include financial flows, profit-and-loss statements, balance sheets, and other sources of media financing not covered in Article 6(1)(d), but that are equally important in providing a broader understanding of the financial situation of media service providers.
	New. Variable 58: Is the national media ownership database easily, quickly, and freely accessible to the public?	This variable requires an on-the-ground assessment to determine whether the ownership database developed under Article 6(2) of EMFA is effectively accessible to the public, free of charge, and in an easy and quick manner, as suggested in point (21) of Commission Recommendation (EU) 2022/1634.
Plurality of media providers	Updating of the weighing of media consumption.	The results of the questions on market and audience concentration per media sector are weighted based on the consumption for each sector. In MPM2026, the data on access to the news were retrieved from the Eurobarometer Media & News Survey: https://europa.eu/eurobarometer/surveys/detail/3153 . In MPM2026, the data are from the EU consumer survey: https://digital-strategy.ec.europa.eu/en/library/consumer-survey-supporting-2025-european-media-industry-outlook-report

Plurality in digital markets	<p>New. Variable 75: Are there in your country objective and reliable data for both traditional and digital audiences, stemming from transparent, unbiased and verifiable audience measurement systems?</p> <p>Fine-tuning variables 76-79. Financial agreements between publishers and platforms/AI companies.</p> <p>New. Variable 80: Are there collective licensing initiatives in your country, including small and independent media?</p>	<p>The audience measurement systems are crucial for transparency and contestability of the advertising market. This variable is introduced in MPM2026 to assess the state of implementation of Art. 24 EMFA.</p> <p>The questions on assessment on the existence of agreements, and the ones on their transparency, are now asked separately.</p> <p>To include in the assessment an element that acquired growing relevance in the media market, as a way to help levelling the playing field.</p>
Editorial independence from commercial and owner influence	To avoid possible overlaps with the political indicators, the variable on the appointment of editors in chief was removed.	The experience of past years has shown that in practice, interferences with appointment decisions are in most cases politically motivated.

Political Independence

The changes to the **Political Independence** area consist of a mix of theoretical and methodological interventions that specifically affected the sub-indicators *Rules on political advertising in the media* and *Rules on political advertising on online platforms* (Indicator: **Integrity of political information during elections**). The underlying attempt

was to reduce the chances of overlapping answers and, where possible, the impact of legal variables. Moreover, some of the changes were made to take into account the full applicability of the TTPA Regulation in October 2025.

Indicator	Changes	Rationale
Integrity of political information during elections	<p>Addition of a new legal (L) variable in the sub-indicator <i>Rules on political advertising in the media</i>:</p> <p>Are there any rules or guidelines that provide for equal conditions for the provision of political advertising in commercial media in the electoral period?</p>	<ul style="list-style-type: none"> - A narrower assessment on regulation on equal conditions in commercial media, including online. - Better distinction between the legal (L) and socio-political (SP) dimensions.
Integrity of political information during elections	<p>Addition of a new L variable in the sub-indicator <i>Rules on political advertising in the media</i>:</p> <p>Is there in your country a National Competent Authority or any other body monitoring effectively on the provision of political advertising services?</p>	<ul style="list-style-type: none"> - Adaptation based on TTPA's requirements.
Integrity of political information during elections	<p>Deletion of L variable (Variable 128 in MPM 2025) from the sub-indicator <i>Rules on political advertising on online platforms</i>:</p> <p>Are the rules for political parties, candidates and lists competing in elections to report on campaign spending on online platforms in a transparent manner implemented effectively?</p>	<ul style="list-style-type: none"> - Avoid overlapping answers.

Integrity of political information during elections	Addition of a L variable in the sub-indicator Rules on political advertising in online platforms: Are there national measures regulating the activity of political advertising by influencers in electoral periods?	- Assess whether the national regulatory framework takes into account the activity of influencers when it comes to the provision and publication of political advertising services in electoral periods.
Integrity of political information during elections	Rephrasing of Variable 128.	- To better understand the measures (laws, self-regulatory initiatives, guidelines or resolutions etc.) already in place at the national level regarding the provision of political advertising services on online platforms; and those being undertaken in light of the full applicability of the TTPA Regulation.
State regulation of resources and support to the media sector	Removal of two variables introduced in MPM 2025 to assess the situation at the country level based vis-à-vis EMFA Art.21.	- Avoid overcomplication, overlapping, and non-comparability between country answers.

Social Inclusiveness

The **Social Inclusiveness** area for the MPM 2026 has the same indicator structure with just one change of indicator name: *Representation of minorities in the media* has become *Cultural and linguistic diversity in the media* in order to better reflect

wider diversity aspects as well as to better accommodate the sub-indicator “Protection against hate speech”. This sub-indicator has also been refined. There was a restructuring within the indicator *Universal and inclusive access to media*, which now has three sub-indicators instead of five.

Indicator	Changes	Rationale
Universal and inclusive access to media	Sub-indicators “Fixed-broadband access”, “Mobile-broadband access” and “Net neutrality” merged into one sub-indicator called “Internet access”.	To make sub-indicators more robust.
	One variable removed from the former sub-indicator on net neutrality: Do ISPs manage network traffic in a way that is transparent, impartial and neutral, without discriminating against particular types of content or content from particular sources?	There was a high correlation between the removed variable and another variable: Are there regulatory safeguards regarding net neutrality in your country and are they implemented in practice?
	One variable was removed from the sub-indicator ‘Media accessibility for people with disabilities’: How would you evaluate the policy on media accessibility for people with disabilities in your country?	To moderate correlation with another variable within this sub-indicator: Is there any legislation in place in your country that requires access services for people with disabilities and is the law implemented effectively?
	Addition of a new variable within sub-indicator ‘Media accessibility for people with disabilities’: Are national regulatory authorities ensuring that media services providers comply with the implementation of existing legal and policy obligations in terms of accessibility?	The variable was added to include requirements of Art 7. AVMSD (para 2).

Cultural and linguistic diversity in the media	Changing the sub-indicator on marginalized communities to “Diversity policy” which assesses the situation with comprehensive diversity policies in PSM and commercial media service providers.	To assess diversity policies improves comparative assessment between countries.
	Variable added within sub-indicator ‘Protection against hate speech’: Does the NRA/ other competent bodies check the respect of anti-hate speech policies on audio-visual media?	The variable was added in order to take into account prohibiting the incitement to violence or hatred in audiovisual media.
Local, regional and community media	Addition of a new variable within the sub-indicator ‘PSM and local coverage’: Is PSM news programme meeting the critical information needs of local communities?	With this addition, the role of PSM on the provision of local information is better assessed as it also considers the fulfilment of critical information needs of local communities by PSM and not only quantitative aspects (presence of branches/correspondents, amount of local news).
Media literacy	Deletion of the following variable. What is the share of individuals who have checked the truthfulness of the information or content they found on the internet news sites or social media over the past three months in your country?	This proxy was deemed as unreliable to assess media literacy skills - see chapter five.
	Addition of a variable in the sub-indicator ‘Media literacy skills’ (see Variable 200): Are information and data literacy skills evenly distributed across the country, considering differences between urban and rural populations, age, gender and education level?	<p>This variable measures the homogeneity in digital skills proficiency across different population groups, namely urban and rural populations, age groups, gender and education level.</p> <p>A homogeneity coefficient is employed as a proxy to assess the homogeneity of media literacy skill among different groups of populations.</p> <p>The risk score for this variable is calculated as follows: (1) The standard deviation of digital skill proficiency (covering Eurostat’s five core digital skill domains) is calculated across four demographic groups (urban/rural, age cohort, gender, education level); (2) The composite index score is then calculated as the average standard deviation across the four demographic groups; (3) Countries are then grouped into tertiles (labelled low, medium and high risk); a higher standard deviation (the proxy for unequal distribution) represents a higher risk score.</p> <p>The following Eurostat dataset is used: Individuals’ level of digital skills (from 2021 onwards).</p>

Annexe 2

Table 1.1.

**Surveillance policy
framework and
cases in the EU
Member States
after EMFA**

Table 1. Surveillance policy framework and cases in the EU Member States after EMFA.

Country	Implementation stage of art. 4 EMFA	Existing legal framework	Cases
Austria	NA (nothing post-EMFA to report)	Art. 31 of the 1981 Media Act on the confidentiality of journalists' sources. Art. 9 of the 2018 amended Data Protection Act.	In 2019, the Constitutional Court (VfGH) declared unconstitutional the regulation on monitoring of messenger services (§ 11 (1) no. 8 f. Staatsschutz- und Nachrichtendienst-Gesetz – SNG [State Security and Intelligence Service Act]) (VfGH, December 11, 2019, G 72-74/2019, G 181-182/2019).
Belgium	NA	Art. 4 of the Act on the protection of sources . Law of 30 November 1998 regulating the intelligence and security services.	
Bulgaria	NA	Art. 15 of the Radio and Television Law , on the protection of journalistic sources. Electronic Communications Act in conjunction with the Criminal Procedure Act on data retention. Art. 32 and 34 of the Bulgarian Constitution.	2013 case of wiretapping by former Interior Minister Tzvetan Tzvetanov. 2023: the PEGA committee reports on Bulgaria as an export hub for spyware. 2025 ECtHR case <i>Girginova v. Bulgaria</i> on infringement of journalists Girginova's access to information related to his acquittal.
Croatia	NA	Article 30 of the Media Act (OG 59/04, 84/11, 81/13, 114/22) on protection of journalistic sources.	
Cyprus	NA	Press Law L. 145/1989 on the protection of journalistic sources. Law on the protection of the secrecy of private communications (surveillance and access to content), L.92/1996) on the use of surveillance by law enforcement authorities.	The European Parliament's PEGA Committee considers Cyprus to be a hub to surveillance activities and for the registration and export of surveillance software products (2022).
Czechia	NA (nothing post-EMFA to report)	Protection of journalistic sources in Press Act No. 46/2000 Coll. and Broadcasting Act No. 231/2001 Coll. Legislation on personal data processing (Act No. 111/2019) Electronic Communications Act (127/2005) on data retention.	2026 Supreme Court's judgment on the case raised by journalist Jan Cibulka: the Czech data retention law conflicts with EU standards . Presence and activity in Czechia of representatives of spyware company Intellexa .

Denmark	NA (nothing post-EMFA to report)	Administration of Justice Act (Consolidated Act No 1284) (2018) Act on the Processing of Personal Data by Law Enforcement Authorities (Act No. 410 of April 27, 2017).	
Estonia	NA	Media Services Act and Code of Civil Procedure on protection of journalistic sources.	
Finland	NA (nothing post-EMFA to report)	Protection of journalistic sources in Act 460/2003 on the Exercise of Freedom of Speech in Mass Media, section 16 . Exceptions to protection of sources in Chapter 17 the Code of Judicial Procedure (4/1734) (section 20), Chapter 7 (Section 3) of the Coercive Measures Act 806/2011 for very serious crimes.	Criminal convictions of two journalists of Helsingin Sanomat for revealing classified information on plans to give Finland's security services greater powers to carry out surveillance and covert operations.
France	NA	Law n° 2010-1 of 4 January 2010 on protection of journalistic sources , Law No. 2016-1524 of November 14, 2016 Act to Strengthen the Freedom, Independence, and Pluralism of the Media . Law No. 2023-1059 of 20 November 2023 on the orientation and programming of the Ministry of Justice	Pegasus case in 2021. The trial is ongoing, with two former executives of the Israeli company NSO placed under the status of assisted witnesses (May 2026) .
Germany	NA	Art. 5 and 10 of the German Constitution on freedom of the press and secrecy of telecommunications. Criminal Procedure Code (Sections 53, 97, 160a StPO) on protection of journalistic sources. BNDG (20 Dec 1990), last amended 2 Dec 2025 . BKAG (1 June 2017) .	Surveillance of the press telephone of "Letzte Generation". 171 journalists were affected. Bayerischer Rundfunk and the Bavarian Journalists' Association lodged a constitutional complaint .
Greece	Article 40 of Law 5253/2025 introduced a National Action Plan for the Safety of Journalists.	Law 5002/2022 Process of lifting the confidentiality of communications, cybersecurity and protection of citizens' personal data.	Predatorgate in 2022. In 2026, a Greek court convicted four individuals .

Hungary	NA See also: Case C-486/24 <i>Hungary v. European Parliament and Council of the European Union</i> - asking for the annulment of Art. 4 EMFA.	Media Act on the protection of journalistic sources.	Pegasus case (2021). <i>Klaudia Csikós v. Hungary</i> , application no. 31091/16 on journalists' phone interception. Publication of wiretaps between a journalist and his source on the press (during the 2026 election campaign).
Ireland	Communications (Interception and Lawful Access) Bill Garda Síochána (Powers) Bill (2025)	National/ECtHR case law affirming journalistic source protection. Interception of Postal Packets and Telecommunications (Regulation) Act (1993) . Communications (Retention of Data) -amended version (2022)	
Italy	NA (nothing post-EMFA to report)	Article 200 of the Italian Code of Criminal Procedure on professional secrecy of journalists. Art. 267 the Italian Code of Criminal Procedure on the procedures for wiretapping.	Cases of Graphite spyware software used on the devices of Italian journalists and activists emerged in 2025.
Latvia	The Safety Plan for Journalists and Other Media Professionals 2025–2027, approved by the Cabinet of Ministers, provides training for journalists and other media professionals on cybersecurity, including its practical application. Especially, it mentions journalists in exile in Latvia. No hard law.	Law on Operative Activities	
Lithuania	NA	Provision of Information to the Public (as last amended on 12 November 2024) (I-1418) Lithuanian Code of Criminal Procedure (No IX-785)	
Luxembourg	NA	Press Council's code of ethics and National Action Plan for the Safety of Journalists, on the protection of journalistic sources.	

Malta	Art. 7.c of Legal Notice 175 of 2025	2018 Data Protection Act (CAP 586) . 1996 Security Service Act (chapter 391, art. 6) on surveillance for national security reasons.	Pegasus and Predator cases . Figures involved in the spyware industry acquired and were then stripped of Maltese citizenship.
The Netherlands	NA	2018 Law on source protection (Wet Bronbescherming in Strafzaken, Stb. 2018/264) and rules by the Public Prosecution Service (2024) on prior authorization for surveillance.	Dutch intelligence office AIVD warned for increasing efforts of criminal networks to spy on (amongst others) journalists .
Poland	NA	Regulations on operational control by three special services (the Internal Security Agency, the Central Anticorruption Bureau and the Military Counterintelligence Service). 1997 Penal Procedure Code (Kodeks postępowania karnego) 1984 Press Law Act (Prawo prasowe) Amendments to the regulations of the Prime Minister regarding operational control carried out by special services (13 December 2014)	Pegasus case involving around 600 persons. In February 2026, ex intelligence chiefs were charged for using the spyware on the workplace. The Commissioner for Human Rights is suggesting some policy changes.
Portugal	National Plan for the Safety of Journalists and Other Media Professionals (PNSJ, resolution n.º 51/2025), on strengthening cyber resilience. No hard law.		
Romania	NA	Audiovisual Law (504/2002) and Law on the functioning of public radio and television (41/1994), on the protection of journalistic sources.	
Slovakia	NA	Act No. 18/2018 Coll. on Personal Data Protection Act No. 166/2003 Coll. on Protection against Wiretapping, on surveillance by intelligence and security bodies . Act No. 264/2022 Coll. (Media Services Act) , Act No. 265/2022 Coll. (Publications Act) Act on the Slovak Information Service (46/1993)	

Slovenia	Art. 6 (2) of the new Mass Media Act (ZMed-1, September 2025)	<p>Art. 137 and 138 Criminal Code on unlawful interception of communication.</p> <p>Art. 260 Criminal Code on acquisition and disclosure of classified information.</p> <p>The Act on the Protection of Personal Data in the Area of Treatment of Criminal Offences (117/20).</p> <p>Electronic Communications Act (130/22).</p>	Black Cube case (March 2026).
Spain	Draft law to regulate professional secrecy for journalists (July 2025)	<p>Article 20.1(d) of the Spanish Constitution provides for journalists' professional secrecy.</p> <p>Article 12 of Organic Law 2/2002 grants powers of prior judicial control to the National Intelligence Centre, in the context of accessing and disseminating classified information.</p>	2022 Pegasus scandal in Spain . CSOs complain about obstructions in investigations .
Sweden	NA	The Freedom of the Press Act (SFS 1949:105) and the Fundamental Law on Freedom of Expression (SFS 1991:1469), on protection of journalistic sources. Foreign Espionage Act (2023)	

Annexe 3

Table 3.1.

**Implementation
stage of Art. 22
of EMFA**

Table 3.1. Implementation stage of Art. 22 of EMFA.

Country	Implementation stage	Pre-existing legal framework
Austria	Draft law EMFA Accompanying Act ¹	§ 13 Kartel Law In addition to the general competition assessment, a media merger must not impair media diversity unless this can be justified on national economic grounds. General criteria, to be assessed on a case-by-case basis.
Belgium	Draft laws Governments' proposals in discussion at regional level, both in the Flemish and the French community.	At federal level: general competition law, occasionally with conditions attached to preserve diversity. In the French-speaking part: media-specific evaluation on a case-by-case basis (French-speaking Community, Decree on Audiovisual Media Services and Video Platform Services of February 4, 2021, Belgian Official Gazette, March 26, 2021, Art. 2.2-3)
Bulgaria	Draft law Amendments to the Radio and Television Law, it is expected to empower the CEM to carry out a media pluralism test.	Competition law, as amended in 2025: for media concentrations an in-depth investigation is mandatory, and the opinion of the relevant sectoral regulator (the Council for Electronic Media, CEM) must be considered. (Art. 83(1.3)).
Croatia	Law EMFA Implementation Act (OG 27/26).	Electronic Media Act (OG 111/21, Art. 63) already required a separate assessment, but it was not fully compliant with Art. 22 EMFA.
Cyprus	No draft law	Law on Radio and television Organisations L. 87(I)/2023 that lifted the thresholds and limitations on media ownership does not envisage separate assessment for media market concentrations.
Denmark	In course of implementation Law 741/2025 The Minister of Culture may lay down further rules on the assessment of media market mergers (Section 85c).	General competition law.
Estonia	Draft Act amending the Media Services Act and related acts (814SE). Opinion to be requested to the Consumer Protection and Technical Regulatory Authority in case of media mergers.	General competition law.

1 EMFG-Begleitgesetz (412 d.B.) <https://www.parlament.gv.at/gegenstand/XXVIII/I/412>

Finland	Law n. 408/2025 Act on the Supervision of Media Markets The Finnish Transport and Communications Agency must assess the impact of the acquisition on media pluralism and editorial independence in accordance with the criteria laid down in Article 22(2) EMFA.	General competition law.
France	No draft law ARCOM called for swift implementation in August 2025 and has been mandated by the French government to work towards it. 2026: Following a complaint by CSOs, the Council of State rejected the request, in an order issued on 18 March 2026, stating that ‘the Council of State cannot compel France to implement the EMFA’.	Separate assessment on media market concentrations limited to some media sectors (Art. 42-3 of September 30th, 1986, Law n° 86-1067, for audiovisual; and Article 11 law n° 86-897 of 1 August 1986 for the press).
Germany	In course of implementation. The 9th amendment of the Medienstaatsvertrag (State Media Treaty) (DMStV). Changes aim to bring the country’s regulatory environment in line with the EMFA. This text will need to be ratified by all German states before it can become law.	Separate assessment of media mergers by KEK: not all sectors and need to update it to meet the challenges of the digital environment.
Greece	No draft law Law 5253/2025 partially implements EMFA, and does not contain any provisions on Art. 22.	General competition law; Law 3592/2007, which applies ownership thresholds only to traditional media.
Hungary	No draft law	Articles 68–70 of the Media Act. The Hungarian Competition Authority (HCA) is obliged to obtain the opinion of the Media Council and this opinion is binding.
Ireland	Draft law General Scheme of the Media Regulation Bill (Head 4) transfers the authority on media mergers transferred from the Minister for Communications, Energy and Natural Resources to Coimisiún na Meán, and adds the element of editorial independence (in addition to plurality of the media).	Separate assessment on media mergers by the Minister for Communications, Energy and Natural Resources.
Italy	The current legal framework may be applied, if extensively interpreted or updated to guarantee its compliance with the scope and criteria set by Art. 22.	Art. 51 TUSMA Legislative Decree 208/2021. Rules and procedures for a separate assessment for media mergers. Guidelines updated by AGCOM with deliberation 66/24/CONS. Editorial independence is not explicitly mentioned.

Latvia	Draft law. Amendments to the Electronic Mass Media Law (based on EMFA implementation report prepared by the Ministry of Culture): the National Electronic Mass Media Council will be designated as the institution responsible for assessing media market concentration.	General competition law.
Lithuania	No draft law.	General competition law.
Luxembourg	Draft law. Bill 8625. NRA: ALIM. The draft law does not specify the substantive rules and procedures. No sanctioning power.	General competition law.
Malta	No draft law Legal Notice 175 of 2025 partially implements EMFA, and does not contain any provisions on Art. 22 The Broadcasting Authority is designated under Chapter III EMFA.	Competition law, only in the audiovisual is there a limited separate assessment.
Poland	Draft Act amending the Broadcasting Act and certain other acts (UC 130). The regulatory assessment will have to include consideration of the impact of concentration on formation of the public opinion and diversity of media services, editorial independence and media viability.	General competition law.
Portugal	The national legal framework appears already in line with the requirement of Art. 22(1).	In the case of relevant market transactions that involve media companies, the decision is based on careful (“case-by-case”) analysis with the intervention of the general competition authority (Lei n.º 19/2012) and the media authority (Lei 53/2005).
Romania	No draft law.	General competition law.
Slovakia	No draft law.	An assessment of the impact of media market concentrations on media pluralism and editorial independence is possible under the pre-existing regulation. (Act No. 264/2022 Coll. on Media Services and Act No. 265/2022 Coll.on Publications). Competent authority: Council for Media Services.
Slovenia	Law Z-Med 1 (Mass Media Act) introduces the new rules and procedures to assess the impact of media market concentrations on media pluralism and editorial independence (Part. IV, Articles 25-40).	General competition law.

Spain	Draft Law 121/000089 The National Commission for Markets and Competition shall be responsible for the Media plurality test (Titulo 7-bis).	Ley 13/2022 (Ley General de Comunicación Audiovisual). The existing rules apply only to a narrow part of the media sector and do not clearly show how the limits in place actually protect pluralism.
Sweden	Law (SFS2025:1242) and Ordinance (SFS2025:1244). Swedish Agency for the Media is tasked with media plurality test.	General competition law.
The Czech republic	Draft law 485/25 - Media Services Act - entrusts the Czech Broadcasting Council with the authority to carry out the media plurality test, as required by EMFA.	General competition law.
The Netherlands	No draft law.	General competition law. Recent developments in the competition enforcement related to media mergers: in the case RTL/DPG, the ACM also sought input from the Commissariaat voor de Media and a range of other experts, and in the final decision conditions were attached to protect media pluralism and editorial independence.

Note to Table 3.1. Updated by CMPF, to the best of our knowledge, in May 2026



Publications Office
of the European Union

doi:10.2870/3260290
ISBN:978-92-9466-825-7
QM-01-26-227-EN-N



Co-funded by
the European Union