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Abstract	This report presents and assesses the plurality and diversity of news media ecosystems in 2022 in the three countries comprising the Mediterranean Digital Media Observatory (MedDMO) Hub.
Keywords	Media plurality, Media diversity, Media industry, Media market, Media systems, Journalism, Greece, Cyprus, Malta.

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Glossary

ABBREVIATION	MEANING
EU	European Union
MedDMO	Mediterranean Digital Media Observatory
RSF	Reporters Without Borders
MPM	Media Pluralism Monitor
FOI	Freedom of Information
AVMS	Audiovisual and Media Services
PSM	Public Service Media
NGOs	Non-Governmental Organizations
OSIS	Open Society Institute - Sofia
SLAPP	Strategic lawsuits against public participation
IĠM	Institute of Maltese Journalists

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Executive Summary

In this deliverable, we report the work conducted under the Work Package 5 (Monitoring of media ecosystem-Task 5.3) regarding the monitoring of media plurality in the region of Greece, Cyprus and Malta. This report aims to present and assess the plurality and diversity of the news media ecosystem in 2022 in the three countries comprising the Mediterranean Digital Media Observatory (MedDMO) Hub.

The report examines the media landscapes in these three countries, delving into three key dimensions for each country: a) media market characteristics and general information, b) the level of fundamental protection and market plurality within their media environments, and, c) the extent of political independence and social inclusiveness observed in their media systems. By analyzing these aspects, the report aims to provide a comprehensive understanding of the media dynamics in these countries. The conclusions drawn from the analysis shed light on the current state of media in Cyprus, Greece and Malta, highlighting similarities and differences across the overall media landscape in the three countries.

1 Introduction

Greece, Cyprus and Malta are three countries in the European South that constitute the 'boundary' between Western European countries, the 'South' (Africa) and the 'East' (Turkey, the Middle East and Asia). They are among the smallest countries of the EU and share similar socio-political experiences regarding their turbulent political history. As such, they are typical examples of the Mediterranean Polarized Pluralist media system model (Hallin and Mancini, 2004), known for their tendency to exhibit high levels of polarization (Maniou and Moutselos, 2023; Vassallo, 2023). In turn, polarization reflects patterns of political behaviour and characteristics inherent in the political systems of these countries (Papathanassopoulos, 2007). Additionally, these systems tend to exhibit high levels of clientelism (Hallin and Papathanassopoulos, 2002), which, in turn, affects levels of professionalization in their media industries (Maniou and Moutselos, 2023).

This report aims to present and assess the plurality and diversity of news media in 2022 in the three countries comprising the Mediterranean Digital Media Observatory (MedDMO) Hub, namely Greece, Cyprus, and Malta.

2 The Case of Cyprus

2.1 Media Market and General Information

Although the media market in Cyprus is relatively small, the competition among different media entities seems to be intense. In 2022, the shift towards online media, which experienced significant growth during the COVID-19 pandemic, appears to have stabilized. Meanwhile, the audience for newspapers is constantly declining, yet legacy newspapers have managed to maintain strong online editions and portals, despite facing competition from various digital native news organizations (Christophorou and Karides, 2023). A recent opinion survey commissioned by the Cyprus Union of Journalists (2022) showed that television and social media are the most common channels for accessing information for Cypriot citizens. More specifically, television continues to be the primary medium for information retrieval on issues that interest the public with a rate of 74%. Social media comes next at 68%, followed by radio at 46% and online portals at 44%, while newspapers have the lowest percentage at 11%. Social media is also the platform where Cypriots usually come across false stories (Cyprus Union of Journalists, 2022). However, a recent survey conducted by Eurostat (2021) indicated that only a small percentage of people (17%) in Cyprus verify the truthfulness of what they read online. In this context, the government and the Parliamentary Legal Affairs Committee initiated discussions on a proposed 'fake news' law with the objective of criminalizing the dissemination of fake news and personal insults online (Paizanou, 2023; Theodoulou, 2023). The discussion concluded without a clear outcome, and the draft law was returned to the Justice Minister for further examination (Philelefthteros, 2023). Finally, Cyprus ranks 55th worldwide in the latest World Press Freedom Index, published by Reporters Without Borders (RSF, 2023a), showing an improvement of 10 places in the index compared to last year.

2.2 Fundamental Protection and Market Plurality

Based on the latest Media Pluralism Monitor (MPM) report (Christophorou and Karides, 2023), the risk level to the fundamental protection of freedom of expression remains low, with primary concerns centering on the protection of the right to information and the lack of compliance with pertinent legal provisions, specifically the laws on freedom of information (FOI) and protection of whistle-blowers. The state of Market Plurality appears

to be the weakest area in the overall context of media pluralism, with different threats and four indicators falling within the high-risk zone. These indicators include the transparency of media ownership, plurality of media providers, plurality in digital markets, and media viability. The transparency of media ownership remains a constant high-risk issue, highlighting a problematic situation for two primary reasons. First, the absence of any regulatory framework for the digital media sector, and additionally, the lack of obligations regarding ownership transparency for print media. Second, the law on Audiovisual and Media Services (AVMS) providers appears ineffective in fully ensuring complete ownership information. In this context, the plurality of media providers is significantly impacted by the lack of ownership transparency and the limited number of options available in the print media and television sectors. At the same time, digital media remains an unknown field due to the absence of regulation, transparency obligations, and comprehensive data, making evaluation impossible. Finally, media viability faced increased risks last year due to economic conditions, high inflation, and declining media revenues. As a result, journalists experienced increased pressures, with job security and the influence of businesses and owners taking priority over editorial independence.

2.3 Political Independence and Social Inclusiveness

The level of political independence in the Cypriot media environment falls within the medium-risk range, according to the results of the MPM 2023 report (Christophorou and Karides, 2023). However, the independence of public service media falls into the high-risk category, with noticeable political interference observed in both the media sector and public service media, a traditional characteristic of the country's media ecosystem (Maniou, 2017). Additionally, the indicator concerning state regulation of resources and support to the media sector raises significant concerns due to the lack of available data and information. According to the opinion survey conducted by the Cyprus Union of Journalists (2022), 46% of Cypriots express trust in the media, while a slight majority of 51% holds trust in Cypriot journalists. Moreover, 48% consider Cypriot journalists to be reliable, indicating a significant level of faith in their reporting, and 42% view the media in Cyprus as reliable. However, 47% feel that journalists exceed their authority, suggesting some concerns regarding journalistic practices. Lastly, only 37% believe that Cypriot journalists have complete freedom of expression. These varying perceptions reflect the complex relationship between the public, media, and journalists in Cyprus, highlighting both trust and areas of concern.

Finally, the Social Inclusiveness area also appears to be at the medium-risk level (Christophorou and Karides, 2023). In this context, access to the media remains predominantly limited to mainstream groups, with politicians and representatives of influential pressure groups dominating media access. As a result, there is very limited to no space available for communities and minorities. Additionally, non-recognized minorities often face negative rhetoric and are portrayed unfavorably in the media and among the native population. Also, the risks associated with gender equality in the media and protection against disinformation and hate speech have increased and are now in the high range. Gender equality policies have not been implemented in either public service media (PSM) or commercial AVMS providers. At the same time, media providers have shown no initiative in promoting gender balance or combating stereotypes through their programming. Access to media for women as experts on news and various topics is still limited, and the representation of women in media management boards and executive positions remains significantly low. Moreover, protection against hate speech lacks a comprehensive policy or clear intent to address the issue, with no improvement observed in the overall environment since 2021. Concerning disinformation, despite occasional statements by officials, no significant steps have been taken to promote a policy framework. While some NGOs engage in awareness-raising initiatives, there is a lack of commitment from media outlets to engage in thorough fact-checking. Finally, media literacy in Cyprus lags behind that of most EU member states, mainly due to the absence of any official media literacy policy, despite

the existence of a draft policy plan since 2012. In the recent OSIS Media Literacy Index (Open Society Institute - Sofia, 2023), Cyprus ranks 28th out of 41 among the countries that are at risk of further decline.

Table 1: Risks to media pluralism for Cyprus (Source: MPM 2023 report)

FUNDAMENTAL PROTECTION	MARKET PLURALITY	POLITICAL INDEPENDENCE	SOCIAL INCLUSIVENESS
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech
33% - low risk	**73% - high risk**	**61% - medium risk**	**64% - medium risk**

3 The Case of Greece

3.1 Media Market and General Information

The Greek media system is mainly characterized by an excess in supply over demand, with an oversupply of news media in different formats. These media outlets face severe competition to attract audiences and advertisers. However, despite the abundance of choices, media consumption in the country appears to be low compared to the rest of Europe (Papathanasopoulos et al., 2021). According to the latest Digital News Report from Reuters Institute for the Study of Journalism (Newman et al., 2023), the media landscape in Greece is characterized by digital fragmentation, a widespread lack of trust in news sources, heavy reliance on social media for news consumption, and high perceptions of undue influence from the political and business sectors. In Greece, people tend to utilize a wide range of news sources on a weekly basis, with the majority of Greek citizens (81%) obtaining news through online media, including social media. Traditional media such as television and print media are ranked lower, demonstrating a declining trend compared to previous years. The fragmentation of online attention can be attributed, in part, to the significant presence of numerous digital news media outlets. Additionally, the high number of Greeks who actively rely on social media platforms, particularly Facebook, for

news consumption further contributes to this phenomenon. Trust in news in the country continues to decline, remaining at very low levels (only 19%). It is worth mentioning that Greece has the lowest trust rate among the 46 countries surveyed in the Digital News Report (Newman et al., 2023). Additionally, the latest annual World Press Freedom Index by Reporters Without Borders (RSF, 2023b) ranked Greece in the 107th position, placing it last among European Union countries for the second consecutive year.

3.2 Fundamental Protection and Market Plurality

Fundamental Protection is characterized by a moderate risk according to the results of the latest Media Pluralism Monitor (MPM) report (Papadopoulou and Angelou, 2023), indicating that the essential prerequisites for media pluralism and freedom are often disregarded in practice. In this context, the elements of the journalistic profession, standards, and protection remain problematic, as many journalists have been victims of intimidation, retaliation, digital surveillance, or physical attacks due to their oppositional voices and investigative work (Mong, 2022; Telloglou and Triantafyllou, 2022; RSF, 2022b; Papadopoulou and Angelou, 2023). In Greece, there is no legal framework to address strategic lawsuits against public participation (SLAPPs), leaving independent media outlets and investigative journalists vulnerable as targets of such lawsuits (European Federation of Journalists, 2022; International Press Institute, 2022). Moreover, regarding the independence and effectiveness of the media authority, the National Council for Radio and Television (ESR), which serves as the broadcast regulator, appears ineffective; this is also highlighted by the World Press Freedom Index (RSF, 2023a). Regarding market plurality in Greece, it appears to be at a high-risk level primarily because of two different factors: plurality in digital markets and, also, editorial independence from commercial and owner influence (Papadopoulou and Angelou, 2023). Specifically, the absence of legal and self-regulatory measures remains a concern and poses significant risks to editorial independence and the protection of journalists from commercial influence. In this context, there is no obligation for media owners to reveal any existing or potential conflicts of interest that could impact editorial content. A major threat to the plurality in digital markets is the lack of publicly available data on online advertising and the audience shares of major online entities. Despite the inclusion of EU Directives that provide guidelines for copyright and related rights, there is a lack of specific provisions addressing the concentration of digital news media. Additionally, the financial arrangements between digital intermediaries and media providers are not available to the public. Finally, the lack of transparency regarding media ownership data in Greece remains a concern, as access to ownership details is limited and regulations on this matter appear opaque. However, several recently implemented laws and initiatives are expected to improve transparency in the future. The lack of transparency also seems to extend to other aspects such as media management, structure, and strategies related to business models in Greece (Leandros and Papadopoulou, 2020).

3.3 Political Independence and Social Inclusiveness

The category of Political Independence exhibits a moderate level of risk and demonstrates improvement as a result of the government's efforts to regulate media resources in a fair and transparent manner (Papadopoulou and Angelou, 2023). However, the issue of editorial autonomy remains a significant concern primarily due to the absence of safeguards that can ensure independence, together with the occasional political interventions in editorial content and the appointment and dismissal of editors-in-chief in different media outlets. A body of literature has documented the existence of an interdependent relationship between political elites and media owners in the country (Papathanassopoulos et al., 2021; Papadopoulou, 2019).

Social inclusiveness remains a high-risk element and a problematic issue, with three factors raising significant concern; namely, the representation of minorities in the media, gender equality in the media, and media literacy (Papadopoulou and Angelou, 2023). Various minority populations experience a lack of programmes and national news in their languages. At the same time, the absence of sufficient provisions and access to media highlights the marginalization experienced by these groups and poses a substantial challenge to their representation and social integration. Another issue is that Greece also has an underdeveloped policy regarding the accessibility of media content for people with disabilities (Papathanassopoulos et al., 2021; Papadopoulou and Angelou, 2023). Furthermore, women are under-represented in management boards and executive positions, and there exists a lack of formal regulations addressing gender balance in reporting and news content. As such, male experts are more commonly invited by the media to provide commentary on various issues. Additionally, news reporting, particularly in far right-leaning media outlets, often portrays women in a highly stereotypical and occasionally derogatory manner (Siapera and Papadopoulou, 2021). Finally, media literacy is often overlooked and can be deemed an underdeveloped or inadequately implemented policy, lacking widespread recognition as a crucial skill. Despite a general awareness of the significance of media literacy, the need for increased efforts to promote media literacy and ensure its integration into the (formal) education system is evident. It is worth mentioning that the 2023 OSIS Media Literacy Index (Open Society Institute - Sofia, 2023) places Greece in the 29th position within the cluster of countries that are at risk of further decline. Moreover, the country's initiatives to combat disinformation are still in the early stages, with limited implementation of self-regulatory frameworks to address online hate speech. Further endeavors are required to effectively tackle the country's disinformation and fake news challenges.

Table 2: Risks to media pluralism for Greece (Source: MPM 2023 report)

FUNDAMENTAL PROTECTION	MARKET PLURALITY	POLITICAL INDEPENDENCE	SOCIAL INCLUSIVENESS
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech
52% - medium risk	**70% - high risk**	**55% - medium risk**	**67% - high risk**

4 The Case of Malta

4.1 Media Market and General Information

An inherent characteristic of Malta's media system is the strong presence of various major institutions, including the state, political parties, the Catholic Church, and the largest trade union on the island (Sammut, 2009; Borg and Lauri, 2012). The ownership of multiple platforms by the two primary political parties remains a distinctive feature where, alongside Public Service Media (PSM) and several independent media outlets, they contribute to a competitive and oversaturated media market, with access to limited advertising budgets (Vassallo, 2023). Apart from a significant level of political parallelism and polarisation, commercial interests and economic factors substantially influence the country's media system (Vella et al., 2023; Hillman, 2023). Based on the findings of an audience assessment survey conducted by the Broadcasting Authority, 90% of Maltese residents are TV viewers, and 61% of residents are radio listeners; television is the primary source for local news for 44.5% of respondents, followed by social media, online news portals, and radio (Fsadni and Associates, 2022). Also, Facebook is the most commonly used platform for watching online Maltese programmes. Based on a recent Eurobarometer survey, online news readership in Malta surpasses the EU average, with 65% of respondents accessing online news compared to the average of 43% across the European Union; social media ranked as the second most popular media platform in the country (55%), with television in third place (52%), followed by radio (22%) and the written press (11%) (Times of Malta, 2022; Vella, 2022). According to 45% of respondents, public television remains the most trusted news source, followed by the written press and its online presence (40%). Private television and radio stations rank in third place, trusted by 29% of respondents. Regarding disinformation and false news, 20% of respondents expressed high confidence in recognizing disinformation, while 59% stated they were fairly confident. The prevalence of exposure to fake news and disinformation in the country is comparable to the EU average, with 10% of Maltese individuals reporting frequent exposure to fake news. According to the latest annual World Press Freedom Index by Reporters Without Borders (RSF, 2023c), Malta ranked 84th, 6 points lower than the previous year.

4.2 Fundamental Protection and Market Plurality

Based on the latest Media Pluralism Monitor (MPM 2023) report, the Fundamental Protection area in Malta appears to have low-risk levels, primarily given legal provisions embedded in the Constitution and the broader legal framework of the country. However, the protection of the right to information and freedom of information requests appear to be persistently problematic, requiring immediate attention and transparency. A common feature is the lack of cooperation and consistent resistance from the state, resulting in repeated denials of journalists requests. As such, Maltese newsrooms face various challenges, and often turn to legal actions to obtain information that should be publicly available (European Centre for Press, Media and Freedom, 2022; Vassallo, 2023). These obstacles, coupled with lawsuits and appeals against publishing orders, exhaust journalists and undermine their ability to engage in reporting that serves the public interest (RSF, 2022a; Vassallo, 2023). International media freedom organizations have taken notice of these issues and expressed concerns regarding the difficulties faced by media outlets in Malta in their attempts to access public information under the Freedom of Information (FOI) Act (European Centre for Press, 2022). Also, the Institute of Maltese Journalists (IĠM) has called upon the government to address the abuse and weaknesses of the Freedom of Information Act, emphasizing the need for a comprehensive overhaul (Calleja, 2023). Additionally, the absence of a comprehensive media authority in the country remains a significant concern. At the same time, Maltese

journalists lack protection from an official union devoted to safeguarding their rights, as the IĠM is classified as an association rather than a formal union (Vassallo, 2023). Among the issues raised by the RSF (2023c) regarding the Maltese media system are the government's resistance to implementing media reforms, the challenges faced by journalists in navigating a deeply divided environment influenced by polarized partisan politics, limited access for journalists considered "hostile" to politicians, problematic reporting on specific topics (such as migration and/or abortion), and the limited number of journalists engaged in investigative reporting.

In contrast to Fundamental Protection, the area of Market Plurality exhibits deep concerns with various elements at high-risk levels, including the plurality of media providers, plurality in digital markets, and editorial independence from commercial and owner influence (Vassallo, 2023). The media landscape in Malta remains problematic as the country's major political parties own and control multiple media outlets, significantly influencing the content produced by journalists due to their alignment with owner political beliefs. Media concentration rules are limited to radio and television services, with no central media authority to oversee compliance with ownership limitations or address related issues in the sector. Another concern arises from the inadequate availability of data regarding revenue market share across all media platforms, as well as readership and circulation data. Specifically in digital markets, media outlets and news practitioners perceive a situation where they have no choice but to provide social media platforms with free content, while simultaneously experiencing a decline in revenue due to the allocation of advertising budgets to social media by media clients. Finally, journalists lack specific mechanisms to protect their editorial independence against owners or enforced editorial changes, as no dedicated trade union exists to represent their interests (as mentioned, the IĠM operates more as an association than a union). Consequently, established industry standards for working conditions are absent.

4.3 Political Independence and Social Inclusiveness

Based on the MPM 2023 report (Vassallo, 2023), Political Independence within the media industry is facing significant challenges, with various parameters within this domain considered to be at critical levels of risk. These parameters include media independence, editorial autonomy, audio visual media, online platforms and elections, and the independence of PSM. This is a direct consequence of the significant presence of political party-owned media within the country’s media landscape, which inherently poses challenges to achieving political independence while exerting influence on content and regulation. In addition, the fact that PSM faces criticism and appears to be significantly under government control and financially dependent on the state (Borg, 2022; Borg and Comodini-Cachia, 2023; Vassallo, 2023), as well as the lack of transparency regarding the members of its editorial board and other decision-making bodies (Galdes, 2023), further intensify the concerns regarding media independence and independence of PSM. Regarding editorial autonomy, there are no standardized regulatory safeguards to ensure autonomy in the appointment and dismissal of editors-in-chief, with each newsroom having its own procedures. Interestingly, the findings of a recent study showed that media professionals believed that the broadcasting regulator and the public service broadcaster in the country are influenced by politics, leading to their perception that the media system's future and potential changes are reliant on political decisions (Vella et al., 2023). It is worth noting that in the general elections held in March 2022 in Malta, smaller parties or other independent candidates did not receive equal treatment and airtime from state-owned media or other media outlets, with the two main parties dominating the political landscape, a finding confirmed by the 2022 Sustainable Governance Indicators (SGI) country report for Malta (Pirotta et al., 2022; Calleja, 2022). Furthermore, the ODIHR expert team (OSCE) monitoring the general elections also reported a lack of pluralistic information offered by the broadcast media, given owner-interference with editorial

autonomy which primarily benefited the two main parliamentary parties -- especially the ruling party -- to the detriment of smaller parties and independent candidates (OSCE, 2022).

Similarly, social inclusiveness also appears problematic, with different elements at high-risk levels exhibiting serious concerns for the Maltese media environment (Vassallo, 2023). First, minority groups are still clearly underrepresented in the local media landscape, with no specific measures to ensure their access to airtime or media space. Second, despite some initiatives and efforts to address the issue of gender equality in the media, it appears that achieving a gender balance in the news media has not been accomplished, while PSM lacks a specific gender equality policy. Regarding media literacy, despite establishing a Media Literacy Development Board in January 2021, no relevant proposals or working documents have been presented; therefore, the country is currently lacking a comprehensive media literacy policy. According to the findings of the 2023 OSIS Media Literacy Index (Open Society Institute - Sofia, 2023), Malta is ranked 26th out of 41 countries and is at risk of further decline in the rankings. Finally, there is currently no formal and dedicated approach to address disinformation, and fact-checking initiatives primarily rely on journalists and independent media (Times of Malta, 2022; De Gaetano, 2022). As such, there is a clear need for increased media literacy activities and initiatives to combat disinformation.

Table 3: Risks to media pluralism for Malta (Source: MPM 2023 report)

FUNDAMENTAL PROTECTION	MARKET PLURALITY	POLITICAL INDEPENDENCE	SOCIAL INCLUSIVENESS
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech
31% - low risk	**70% - high risk**	**83% - high risk**	**66% - medium risk**

5 Conclusions

Media pluralism in Cyprus, Greece and Malta has shown little progress over time, with the media environment facing significant challenges and risks in 2022. The lack of proactive measures to modernize the regulatory framework and establish contemporary rules for the media landscape remains a major concern in all three countries. Similarly, the absence of relevant data and ownership transparency tends to make the landscape unclear to regulators and the public. Another threat stems from political bias and noticeable political interference in the media, which involves the need to enhance the autonomy and effectiveness of public service media (PSM) and ensure impartiality and independence. Social inclusiveness continues to be a concern, with minorities excluded and underrepresented in the local media, while the achievement of gender balance remains an ongoing challenge. Finally, recognizing media literacy as a key skill and making efforts to further promote and integrate it into the education system in Greece, Cyprus and Malta would be another step in the right direction. Regarding fundamental protection, issues related to freedom of information requests and the protection of journalistic work should be promptly and transparently addressed. Concurrently, the need for media reforms appears to be essential in all three countries under study.

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