

Media Plurality Report – 2023: Cyprus, Greece & Malta

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Abstract	This report presents and assesses the plurality and diversity of news media ecosystems in 2023 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 lawsuit against public participation
IĠM	Institute of Maltese Journalists
EFJ	European Federation of Journalists
IFJ	International Federation of Journalists

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1 Executive Summary

In this report, we present the work conducted under Work Package 5 (Monitoring of media ecosystem-Task 5.3) regarding the monitoring of media plurality in the region of Greece, Cyprus and Malta. The report examines the plurality and diversity of the news media ecosystem in 2023 in the three countries comprising the Mediterranean Digital Media Observatory (MedDMO) Hub. It follows last year's Media Plurality Report (Giomelakis and Maniou, 2023) and is the second release in an annual series published by MedDMO.

The report delves 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 local media systems, and c) the extent of political independence and social inclusiveness observed in their media landscapes. 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.

It should be noted that this year's report is supplemented by commentaries from local media plurality experts from the three countries. We would like to thank them for their contributions: Christophoros Christophorou, responsible for coordinating and authoring the MPM reports for the European University Institute for Cyprus, and Nicholas Karides, Director of the Institute for Mass Media (IMME) at the Universitas Foundation, and MPM researcher; Lambrini Papadopoulou, Assistant Professor at the National and Kapodistrian University of Athens, responsible for coordinating and authoring the MPM reports for Greece; and, Louiselle Vassallo, Senior Associate Academic at the University of Malta, responsible for coordinating and authoring the MPM reports for Malta until 2023.

2 Introduction

Greece, Cyprus, and Malta are three Southern European countries among the smallest EU member states, which share similar socio-political experiences stemming from their turbulent political histories. They exemplify the Mediterranean Polarized Pluralist media system model (Hallin and Mancini, 2004), which is characterized by a high degree of polarization (Maniou and Moutselos, 2024; Vassallo, 2023), high levels of clientelism (Hallin and Papathanassopoulos, 2002; Papathanassopoulos, 2007), and low levels of professionalization within their media industries (Hallin and Mancini, 2004).

This report aims to present and assess the plurality and diversity of news media in 2023 in the three countries comprising the Mediterranean Digital Media Observatory (MedDMO) Hub, namely Greece, Cyprus, and Malta. The report follows the 2022 Media Plurality Report (Giomelakis and Maniou, 2023) and is the second release in the annual series published by MedDMO.

3 The Case of Cyprus

3.1 Media Market and General Information

The media landscape in Cyprus can be characterized as highly concentrated and intensely competitive despite its relatively small size. It also suffers from a lack of transparency in various areas, a tight advertising market, and an environment increasingly vulnerable to the influence of commercial and political interests (Price et al., 2024; RSF, 2024a). The shift towards online media, which saw significant growth during the COVID-19 pandemic, appeared to stabilize in 2022, and this trend continued in 2023. Although the audience for newspapers is steadily declining, legacy newspapers have managed to maintain strong online editions and portals, competing with various native digital news organizations (Christophorou and Karides, 2023; 2024). An opinion survey commissioned by the Cyprus Union of Journalists (2023) revealed that television and social media remain the most common channels for Cypriot citizens to access information. Specifically, television continues to be the primary source for information retrieval on issues that interest the public, with a usage rate of 72%. Social media follows at 60%, online portals at 42%, radio at 41%, while newspapers have the lowest usage at 9%. Additionally, social media is the platform where Cypriots most frequently encounter false stories, followed by television and online portals. It is worth noting that a recent survey conducted by the European Parliament (Eurobarometer, 2023) indicated that social media platforms (70%) were the most used medium to access news, followed by television (62%) and online press and news platforms (52%). Lastly, in the recent World Press Freedom Index published by Reporters Without Borders (RSF, 2024a), Cyprus has dropped ten points since 2023 and now ranks 65th of 180 countries globally examined.

3.2 Fundamental Protection and Market Plurality in the National Media System

According to the latest MPM report for Cyprus (MPM, 2023/2024), the risk level concerning Fundamental Protection has slightly increased compared to 2022, now reaching medium-risk levels (Christophorou and Karides, 2023; 2024). The main concerns are focused on the protection of the right to information and on journalistic professional standards and protection. Regarding the former, access

to information still encounters significant issues and obstacles. More effort and concrete actions are needed to ensure that laws are effectively implemented after their adoption. In terms of the journalism profession, further legal measures are necessary to safeguard journalists and journalism practices, such as protection from surveillance and other threats. In this context, the disclosure that Cyprus supported an article allowing the surveillance of journalists during discussions on the European Media Freedom Act has sparked significant concerns (Hazou, 2023; Kades, 2023). Furthermore, employment uncertainty in the media environment remains a major issue, exacerbating the challenges faced by the Cyprus Union of Journalists and news practitioners themselves (Vatikiotis et al., 2024). Within this media landscape, journalists are confronted with the difficult decision of prioritizing defending editorial independence over safeguarding their labor rights, or accepting reductions in employment benefits (Christophorou and Karides, 2024). In addition, the absence of any anti-SLAPP (Strategic lawsuits against public participation) law and interference by media owners in editorial content continue to pose significant challenges for media professionals and media freedoms (Papadopoulou and Maniou, 2024). Lastly, recent legislative attempts by the Cyprus Parliament and a proposal for an amendment to its criminal code that aim to introduce prison sentences of up to five years for anyone caught spreading “false news” or writing “offensive” comments have been denounced by the international journalism community, which considers this amendment a serious violation of European principles of press freedom. The International and European Federations of Journalists (IFJ-EFJ) have joined their Cypriot affiliate, the Union of Cypriot Journalists (UCJ-ESK), in condemning this criminalization of fake news and its chilling effect on press freedom (IFJ, 2024; EFJ, 2024).

Market plurality constitutes the worst-performing sector overall, with the highest risk levels for another year, facing various threats and four indicators falling within the high-risk zone: transparency of media ownership, plurality of media providers, plurality in digital markets, and editorial independence from commercial and owner influence (Giomelakis and Maniou, 2023; Christophorou and Karides, 2024). Transparency of media ownership continues to be at high-risk levels, facing issues such as lack of data or complete absence of regulation for digital media and lack of ownership transparency obligations and ownership data for print media. Primarily due to amendments to the law on Radio and Television Organizations in July 2023 and the abolishment of various restrictions on media control and ownership, a completely new reality has emerged (Christophorou, 2023), in which control of ownership concentration appears unattainable under the revised legal framework. The same situation applies to both print and digital media, as constraints in media law are either abolished or absent, significantly impacting the plurality of media providers negatively. Similarly, the risk associated with plurality in digital markets is elevated due to the ongoing lack of regulations and comprehensive audience data (Giomelakis and Maniou, 2023; Christophorou and Karides, 2024). Media viability appeared to be in a slightly better position in 2023, as evidenced by verified data on revenue, especially in the radio and television sectors. However, the risk for editorial independence from commercial and owner influence appears to be at high levels, raising significant concerns. Specifically, there are no effective protections against owner influence, and the lack of separation between commercial and editorial departments within media organizations is affecting media content. Many individual news practitioners are involved in the broader communication and marketing sector, which increases the risk level while at the same time increased pressures and uncertainty lead journalists to compromises (Giomelakis and Maniou, 2023; Vatikiotis et al., 2024). The impact on editorial and news content is widespread and particularly noticeable in online media, both legacy and native digital. This trend is also apparent in print media and, to a lesser extent, in television, despite existing regulations.

3.3 Political Independence and Social Inclusiveness in the Media Landscape

The domain of political independence falls within the medium-risk range with a slight increase from last year (Christophorou and Karides, 2023/2024). Ensuring the media remains free from political influence is one of the most challenging issues in this area, with risks increasing significantly due to the lack of transparency and the lifting of ownership restrictions. The aforementioned recent changes to the law on Radio and Television Organizations and the removal of most constraints and barriers on media ownership and control by individuals, including politicians and state officials, can only exacerbate the current situation. Similarly, there is no provision addressing ownership or control of print media, and digital media operate without any regulatory framework. Additionally, the Cyprus News Agency's market monopoly and its political ties raise further concerns. Regarding editorial autonomy, there are no specific mechanisms or provisions to effectively shield journalists from political interference. There is no regulatory framework governing the appointment or dismissal of editors-in-chief, who are often expected to advance the political agenda of the media owner. Finally, the independence of public service media is still categorized as high-risk, maintaining a traditional characteristic of the country's media ecosystem (Maniou, 2017; Price et al., 2024; Giomelakis and Maniou, 2023).

The area of social inclusiveness further deteriorated in 2023, entering the high-risk range (Christophorou and Karides, 2024). The main risks and challenges include gender equality in the media, representation of minorities, and protection against disinformation and hate speech. In terms of gender equality, the lack of relevant policies by both public service and commercial audiovisual media service providers (AVMS) remains a major issue, as it was the previous year (Giomelakis and Maniou, 2023). A significant gap is evident in the presence of women in executive positions and media management boards, as well as in roles such as editors-in-chief, within an environment that can be characterized as male-dominated. Regarding minority representation in the media, non-recognized minorities, who make up a significant portion of the country's population and labor force, are given no access or voice. Private TV and radio service providers continue to lack local productions in languages other than Greek, while the portrayal of migrants and refugees in several mainstream media tends to be mostly negative or, at best, neutral. The indicator related to protection against disinformation and hate speech also remains within the high-risk range, largely due to the lack of a specific strategy or regulatory policy framework addressing disinformation. On a positive note, the launch of new independent fact checking initiatives, such as MedDMO and Fact-Check Cyprus, is encouraging. The Fact Check Cyprus Centre was established on November 20, 2023, at the Social Computing Research Center of the Cyprus University of Technology (CUT). It is the result of a collaboration between individuals combating misinformation from Cyprus and Greece. The Centre aims to deconstruct false news and educate the public on combating mis/disinformation while promoting media literacy. It is worth noting that media organizations in the country do not employ fact-checkers. The issue goes beyond the lack of a fact-checking culture; the precarious financial condition of these media organizations serves as a rationale for not prioritizing the recruitment or training of fact-checkers. Similarly, media literacy also lacks an adopted policy framework and is not systematically or comprehensively addressed. Media literacy exists within the education system in Cyprus, but it is not fully integrated into the curriculum. Some teachers voluntarily undertake relevant activities, and the Cyprus Pedagogical Institute of the Ministry of Education and Culture plays a significant role by promoting various projects within the educational system, sometimes in collaboration with the Cyprus Radio Television Authority. In the 2023 OSIS Media Literacy Index (Open Society Institute - Sofia, 2023), Cyprus ranked 28th of 41 among the countries at risk of further decline.

Table 1: Risks to media pluralism for Cyprus (Source: MPM 2024 report)

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media literacy
Universal reach of traditional media and access to the internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech
34% - medium risk	**78% - high risk**	**63% - medium risk**	**68% - high risk**

4 The Case of Greece

4.1 Media Market and General Information

The media landscape in Greece is characterized by digital fragmentation and polarization, high use of social media for news consumption, a high degree of media concentration, and concerns regarding undue influence from politicians and powerful businessmen (Wiseman, 2023; Newman et al., 2024). Additionally, the Greek media system includes 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). In this context, Greek journalism faces a crisis of credibility, being one of the two EU countries (along with Hungary) with the lowest level of trust (23%) in news and the media, according to the latest Digital News Report (DNR) by the Reuters Institute for the Study of Journalism (Newman et al., 2024). Trust is low across all groups, but it is especially low among younger and left-wing respondents. It is worth noting that the latest annual World Press Freedom Index by Reporters Without Borders (RSF, 2024b) ranked Greece 88th (up from 107th in 2023) of 180 countries, placing it last among European Union countries for the third year in a row. In Greece, people tend to utilize a wide range of news sources on a weekly basis. According to a recent survey published

by the European Parliament (Eurobarometer, 2023), TV constitutes the most popular medium to access news (65%), followed by online press and/or news platforms (57%) in second position, and social media platforms in third (55%). However, social media sources continue to dominate over TV among online news users in Greece, while Greek publishers continue to struggle to attract large audiences on these platforms, which are dominated by social media personalities and smaller native digital brands (Newman et al., 2024).

4.2 Fundamental Protection and Market Plurality in the National Media System

According to the latest Media Pluralism Monitor (MPM) report (Papadopoulou and Angelou, 2024b), the country's risk levels in the area of fundamental protection increased in 2023 compared to 2022 and are now very close to high-risk levels. Regarding journalistic standards and protection, the media system and news practitioners face several persistent and continuing challenges, including unsatisfactory working conditions, low wages, attacks, and legal threats (Papadopoulou and Maniou, 2024), which undermine the practice of journalism overall. It is important to note that numerous attacks or threats to the physical safety of journalists occurred this year, with some of these incidents initiated by police authorities (RSF, 2023; Papadopoulou and Angelou, 2024b), fostering a sense of impunity, especially among investigative journalists. A characteristic example is the 2021 assassination of George Karaivaz, whose case remains unsolved. The lack of anti-SLAPP or similar legislation has resulted in a high occurrence of SLAPPs, particularly against smaller independent outlets, leaving independent media outlets and investigative journalists vulnerable as targets of such lawsuits and threatening the survival of investigative journalism in the country (Papadopoulou and Maniou, 2024; EFJ, 2022; International Press Institute, 2022). Finally, in terms of the independence and effectiveness of the media authority, 2023 saw highly controversial procedures used to appoint the new board of the National Council for Radio and Television (ESR), Greece's main media authority and broadcasting regulator. This raised serious concerns about political interference and irregularities in the process. The independence and effectiveness of this media authority have also been highlighted by the World Press Freedom Index (RSF, 2023).

Regarding market plurality, key concerns include plurality in digital markets and editorial independence from commercial and ownership influences (Wiseman, 2023; Papadopoulou and Angelou, 2024b). Specifically, digital market plurality remains at a high-risk level, largely due to the ongoing lack of public data regarding online advertising market shares and audience shares of leading digital entities. This deficiency hinders an accurate assessment of market concentration and its impact on media pluralism. Additionally, despite some progress, the sector still struggles with the lack of robust legal or self-regulatory frameworks to adequately shield journalists from commercial or ownership pressures, requiring a multifaceted approach that encompasses legislative reforms and the enhancement of self-regulatory measures. While there has been significant progress in the transparency of media ownership, other challenges persist in the area of media viability, particularly regarding economic uncertainties and the ability to sustain growth and adapt to evolving market conditions (Papadopoulou and Angelou, 2024a). Finally, a notable incident in the Greek media market was the purchase of the rights to the domain of the historic newspaper *Eleftherotypia* and its Sunday edition, *Kyriakatiki Eleftherotypia*, for €8.1 million by *Alter Ego Media*, a media group controlled by shipping magnate Evangelos Marinakis and owner of major outlets like *To Vima, Ta Nea, in.gr, Mega TV,* and

One TV. The acquisition came after *Eleftherotypia* went bankrupt and ceased operations in 2014 (Protothema, 2014).

4.3 Political Independence and Social Inclusiveness in the Media Landscape

Political independence in the media sector remains in the medium-risk range, with a slight improvement since 2022 (Papadopoulou and Angelou, 2024b). However, editorial autonomy is a concerning issue and represents a high-risk area, indicating systematic political interference in the editorial content of various news media outlets. Greek media laws and regulations lack safeguards for appointing and dismissing editors-in-chief independently, and research suggests media owner influence continues to shape news framing (Papadopoulou, 2020; Papathanassopoulos et al., 2021). Similarly, interactions between political elites and media owners raise additional concerns (Papadopoulou, 2019; Papathanassopoulos et al., 2021; Wiseman, 2023). Finally, the state control of the Athens-Macedonian News Agency (ANAMPA), the country's sole news agency, as well as the lack of independence in public service media appointments (e.g., president, CEO, and members of the board of directors) in the Hellenic Broadcasting Corporation (ERT), add to the above issues, maintaining a persistent status quo.

Social inclusiveness exhibits an overall moderate risk with challenges in minority representation and gender equality in the media (Papadopoulou and Angelou, 2024b; Katsambekis et al., 2024). The lack of media content in minority languages and the underrepresentation of ethnic diversity highlight a policy-practice gap, or in other words, a gap between legal frameworks and practical implementation. Furthermore, accessibility for people with disabilities remains inconsistent despite relevant laws, indicating a need for a more systemic approach. The current situation underscores the crucial need for media entities to not only comply with regulations but also genuinely commit to embracing diversity and inclusivity as core values. Simultaneously, local/regional, and community media are facing increasing challenges, including legislative gaps, changing content strategies, sustainability issues, and concerns about political influence (Papadopoulou and Angelou, 2024a; 2024b). Regarding gender equality, despite some improvement, issues such as women's diminished public presence, stereotypical portrayals, and underrepresentation in Greek media leadership positions persist. Preliminary findings of a study by the National Centre for Social Research (EKKE), supported by the Heinrich Böll Foundation, revealed evidence of women's under-representation in Greek media in the run-up to the 2024 European Parliament elections, with women receiving substantially fewer media appearances (Katsambekis et al., 2024). Compared to other EU members, Greece performs poorly in gender equality, ranking 24th of 27 in the 2023 EIGE Index (EIGE, 2023).

Media literacy has seen significant improvement, suggesting progress in integrating it into education and society. However, more efforts and initiatives are needed in this field as challenges remain, such as the lack of a comprehensive framework for training educators and the optional nature of media literacy education. In the 2023 OSIS Media Literacy Index (Open Society Institute - Sofia, 2023), Greece ranked 29th out of 41 countries among those considered at risk of further decline. Similarly to media literacy efforts, the growth of other fact-checking initiatives (including MedDMO, Fact Check Cyprus, FactReview, Greece Fact Check, Check4Facts.gr, alongside AFP Greek Fact Check and Ellinika-Hoaxes) and legislation addressing hate speech represents a positive step. However, a national strategy and stronger frameworks are needed to specifically target and address disinformation and hate speech.

Table 2: Risks to media pluralism for Greece (Source: MPM 2024 report)

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of the right to information	Plurality of media providers	Editorial autonomy	Local, regional, and community media
Journalistic profession, standards, and protection	Plurality in digital markets	Audiovisual media, online platforms, and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media literacy
Universal reach of traditional media and access to the internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech
61% - medium risk	**63% - medium risk**	**53% - medium risk**	**62% - medium risk**

5 The Case of Malta

5.1 Media Market and General Information

Malta's media landscape is historically characterized by the prominent presence of several major institutions, including the state, political parties, the Catholic Church, and the island's General Workers Union (Borg and Lauri, 2012; Vassallo, 2023). Notably, the ownership of news media/platforms by the two primary political parties is a distinct feature. Together with Public Service Media (PSM) and various independent outlets, this contributes to a competitive yet oversaturated media market, constrained by limited advertising budgets (Vassallo, 2023). Alongside significant political alignment and polarization, the media system is heavily influenced by commercial interests and economic factors (Vella et al., 2023). Based on the findings of an audience assessment survey conducted by the Broadcasting Authority (2023), 88.2% of Maltese residents are TV viewers, and 64.4% of residents are radio listeners. Also, nearly 50% of all Maltese residents use TV as their preferred source for local news. According to a recent survey published by the European Parliament (Eurobarometer, 2023), social media platforms were the most popular medium for accessing news (70%), followed by TV and online press and/or news platforms in second place (49%), and radio in third (21%). This trend is further supported by the Broadcasting Authority's survey (2023), which revealed that Facebook (74%) was the most used platform for watching online Maltese programs/audiovisual content among citizens

(across all age cohorts), followed by *Times of Malta* (27.4%), YouTube (22.8%), Instagram (16.5%), and *Lovin Malta* (14.3%). In a 2022 media and news survey (Eurobarometer, 2022), 45% of Maltese citizens considered public television to be the most trusted news source, followed by the written press and its online presence (40%). Private television and radio stations ranked in the third place, trusted by 29% of respondents. The latest Press Freedom Index, compiled by Reporters Without Borders (RSF, 2024c), ranked Malta 73rd of 180 countries, up from 84th in 2023; however, it remains second-to-last in the EU, ahead only of Greece.

5.2 Fundamental Protection and Market Plurality in the National Media System

Fundamental protection in Malta has seen an overall increase in risk compared to the previous year (Repeckaite, 2024). The current state of freedom of expression is marked by a stalled reform process, a significant gap between suggested protective measures and international best practice standards, and an ongoing risk of SLAPPs. Notably, the Coalition Against SLAPPs in Europe recently named the country the SLAPP Country of the Year 2024 (Montebello, 2024). According to different press freedom groups (EFJ, 2023), the climate of impunity that led to the murder of Daphne Caruana Galizia in 2017 still has not been addressed, especially regarding journalists' safety, and there has been little to no progress on implementing the recommendations from the public inquiry following the assassination. Journalists and media professionals continue to face libel suits, harassment, and accusations, which caused Freedom House to lower Malta's civil liberties score (Price et al., 2024; Freedom House, 2023). Right to information remains the most troubling issue in this category, with risk levels significantly rising due to a stalled and reportedly unsatisfactory reform process, frequent delays in providing data, lack of cooperation and the government's general tendency to ignore and sideline certain media outlets (European Centre for Press, Media and Freedom, 2022; Repeckaite, 2024). Press freedom NGOs and experts consider the development of constitutional protections inadequate (De Gaetano, 2023), while the country has been criticized by the Council of Europe's Commissioner for Human Rights for "unwarranted secrecy within state institutions" (Mijatović, 2023). Amid the absence of effective protections for independent journalism, Malta's government reportedly advocated in a European Council debate on the European Media Freedom Act (i.e. a set of rules to protect media pluralism and independence in the EU) for EU law to permit spying on journalists (Muscat, 2023). Lastly, the state and operation of the Broadcasting Authority reflect Malta's overarching bipartisan structure and raise serious concerns regarding the independence and effectiveness of the media authority, such as in the appointments of directors or the chairperson.

Market plurality remains a high-risk element and a problematic issue, with four factors raising significant concern: plurality of media providers, plurality in digital markets, editorial independence from commercial and owners influence, and media viability (Vassallo, 2023; Repeckaite, 2024). In the domain of media providers' plurality, although there has been a notable reduction in risk levels, the primary structural issues persist. Anti-concentration regulations are only applicable to broadcast media, and there is no publicly accessible data on print circulation. Furthermore, there is no centralized media authority to oversee compliance with ownership limitations or address related issues in the sector. The audiovisual market continues to be dominated by the public broadcaster and politically aligned TV and radio stations. In 2024, it was disclosed that the TV channel affiliated with the ruling party received more than seven times the government advertising revenue of the main opposition party's channel (Carabott, 2024), despite only one percentage point difference in audience share, according to a survey

by the broadcasting authority. Plurality in digital markets remains a concern and is marked by limited data availability, while local media are compelled to employ major social media platforms due to their widespread use for many people (also as primary news sources), despite the minimal and decreasing returns for the media (Vassallo, 2023). The viability of media outlets is also under significant threat, with risk scores rising into the high-risk zone. This is driven by several factors, including the increasing power of social media platforms, the government's tendency to bypass journalists and communicate directly with the public on social media, and the economic strain of the cost-of-living crisis. In the same context, editorial independence from commercial and owner influence falls within the high-risk range with a significant increase from last year, according to the latest MPM report (Vassallo, 2023; Repeckaite, 2024). Media partisanship remains a prominent issue in the country for another year and continues to impact editorial independence. According to a recent study, editors employed by commercial entities feel they have a greater degree of autonomy in their work compared to other media outlets (Vella et al., 2023). Staff journalists benefit from general protections under labor laws, yet they lack self-regulation or access to a trade union. Interestingly, only a minority of media organizations operate independently without affiliation to external institutions such as political parties or interest groups. Additionally, major media houses and their owners are closely connected to the advertising sector (Euromedia Research Group, 2023; De Gaetano, 2022; Repeckaite, 2024).

5.3 Political Independence and Social Inclusiveness in the Media Landscape

Political independence in the media landscape continues to be the domain with the highest risk scores for Malta, facing significant challenges related to media independence, editorial autonomy, media, platforms and elections, and the independence of PSM (Price et al., 2024; Vassallo, 2023; Repeckaite, 2024). Although the law does not prohibit partisan ownership, the significant presence of media owned by political parties raises concerns about political independence and its influence on content, regulation, as well as the intensification of polarization and partisanship in society, which erodes public trust in journalism (Vella et al., 2023). The extent of political parallelism, a term describing media partisanship and the extent to which the media reflect the party system (Hallin and Mancini, 2004), remains high and is a dominant characteristic of the Maltese media landscape (Price et al., 2024). In terms of editorial autonomy, there are no uniform regulatory safeguards in place to ensure independence in the appointment and removal of editors-in-chief. Each newsroom follows its own procedures, but concerns primarily revolve around partisan media. While many journalists feel independent, they see excessive political influence as damaging to news practices and hindering the journalism profession (Vella et al., 2023). As required by the constitution, the Broadcasting Authority must maintain fairness in disputes and ensure accurate news reporting; however, a 2023 court ruling found that the Authority failed to enforce its decisions when the public broadcaster disregarded its orders, resulting in unfair representation of the main opposition party (Repeckaite, 2024). It should be noted that in the March 2022 general elections in Malta, smaller parties and independent candidates did not receive fair treatment or airtime from state-owned and other media outlets. This dominance of the two main political parties was highlighted in the 2022 Sustainable Governance Indicators (SGI) country report for Malta (Pirotta et al., 2022; Calleja, 2022). Lastly, the independence of PSM remains a significant concern. For instance, there are no specific laws governing how its management is appointed, and appointments are made by the minister in charge (Borg, 2022; Galdes, 2023; Vassallo, 2023). In this context, media professionals in the country perceive that the governance of the

broadcasting regulator and the operations of the public service broadcaster are influenced by politics. This shapes the perception that the future of the media system and potential changes depend on political decisions (Vella et al., 2023).

Social inclusiveness continues to be challenging for another year due to high risk levels and major concerns related to the representation of minorities and gender equality in the local media (Vassallo, 2023; Repeckaite, 2024). The underrepresentation of minorities poses a significant risk, reflecting a media landscape where minorities are disproportionately absent from news coverage with no specific measures to ensure their access to airtime or media space. The PSM lacks a published diversity policy, and the Broadcasting Authority provides no guidance on this issue. Similarly, achieving gender balance in the news media has not yet been accomplished. PSM also lacks a specific gender equality policy, and no data on gender representation are released by the Maltese Broadcasting Authority (Repeckaite, 2024). On a more positive note, media literacy has significantly decreased to a medium-risk level compared to last year, and new initiatives have emerged to address this area. Training programs and resources for educators are now accessible at different levels, including those provided by the government for primary school teachers, as well as opportunities offered by the Malta Union of Teachers, the Institute for Education, the University of Malta, and through informal self-guided learning. Additionally, the Media Literacy Development Board supports these efforts by organizing networking events with stakeholders. However, more efforts need to be made in this area. It is worth noting that in the 2023 OSIS Media Literacy Index (Open Society Institute - Sofia, 2023), Malta was ranked 26th of 41 countries in the group of countries at risk of further decline. Finally, there has been a slight decrease in risk level in terms of protection against disinformation and hate speech, attributed to a recent rise in fact-checking efforts within the local media landscape. Two media outlets have launched fact-checking initiatives, including the *Times of Malta*, which partnered with MedDMO to combat disinformation narratives in the country. In addition, the Department of Media and Communications of the University of Malta has also partnered with MedDMO to combat disinformation.

Table 3: Risks to media pluralism for Malta (Source: MPM 2024 report)

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media literacy

Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech
37% - medium risk	**74% - high risk**	**84% - high risk**	**67% - high risk**

6 Conclusions – Remarks from experts

While there were slight improvements in various aspects of the media ecosystem in Cyprus, Greece and Malta during 2023, the overall picture remains problematic, with the three countries sharing common challenges within the broader context of media plurality.

In Cyprus, the state of media pluralism has seen an overall marginal risk deterioration, with little or no improvement in the different areas, and the media environment is facing significant challenges and risks. According to Nicholas Karides, director of IMME and member of the MPM team for Cyprus, these reports capture, as accurately as scientifically possible, the risks in Cyprus. But over and above the report's individual findings, it is regrettable to note that there is no serious public debate in the country on issues relating to media pluralism, transparency of ownership and editorial independence. This is the result of a complete disregard of the importance of a pluralist media environment by the political establishment itself. On various occasions - including on World Press Freedom Day - politicians will make proclamations that are not followed up and seem to fall flat given their lack of consideration for the risks associated with the absence of media pluralism in the country. Public consultations, or indeed consultations with stakeholders and experts in the field, are ignored, and the little that occurs is rarely substantive or sincere. Regarding journalism and the news industry in general, despite the existence of many committed and independently-minded journalists, what is deeply concerning is the continuing adverse economic situation of the media, their failing business model, their poor adjustment to the new digital order, their one-way click-bait culture and social media dependency, and the absence of fact-checking processes. These have resulted in an overall unhealthy media environment with poor journalistic output. Journalists are not paid well, media owners care little about the public interest and are focused instead on their own financial survival; they have by extension become increasingly reliant on corporate and political support, which has consistently compromised their capacity to deliver on their role. However, on an optimistic note, the last 12 months saw a greater appetite for investigative journalism. Individual members of the journalistic community appear to have adopted a bolder approach and determination to expose wrongdoing.

According to Christophoros Christophorou, independent expert and coordinator of the MPM team for Cyprus, the absence of strategic planning capacity in Cyprus governance and politics in general also applies to the media sector; ensuring media pluralism, which is the ultimate goal in democratic societies, does not seem to preoccupy any authority. Plans in this direction are non-existent, while measures promoted and actions that affect the media environment have a random character at best. or are suspected of serving non-avowed interests at the expense of the public interest. In his view, both the executive and the legislative powers are failing to proactively ensure a regulatory framework that fully respects media freedom and the people's right to freedom of expression while also regulating the media

sector in ways that shed light on ownership and avert monopolies. As Christophorou explains, they are instead choosing ways to deflect criticism or even to influence and control the media. He also comments that the absence of any regulation at all for the native digital sector and online media in general, the obsolete and inoperative Press Law and the CyBC Law and the deficiencies of the Law on Radio and Television are not creating a situation where political control and influence are best served. This also creates an environment where the interests of media owners, of businesses and political power are intertwined to serve these three groups.

Neglect of expert knowledge and limited capacity to understand the full meaning of media freedom and free expression are also critical factors that raise obstacles to any progress. The governance of important institutions, such as the Cyprus Broadcasting Corporation (RIK – CyBC) and the Radio Television Authority requires that its members have extensive knowledge and expert experience from different angles (including law, technology, journalism, and the media). As Christophorou observes, "We witness instead problematic reading of the law, decisions that violate media freedom and, most important, the absence of any capacity to regulate, to make proposals to the executive for responding to the challenges facing the media sector today." Under these conditions, it is unsurprising that in July 2023, the law on radio and television organizations was amended and all obstacles to media control and ownership concentrations were abrogated. This raises serious questions about how such an amendment was allowed, permitting multiple media ownership by members of a single family or a single individual to be manager of multiple media organizations. It is also a matter of concern that the House of Representatives voted and the President of the Republic promulgated a law drafted by a single deputy and presented to the parliament with no research, explanatory report, expert analysis, or public consultation. The Radio Television Authority "had no objection to the amendment", according to the minutes of the parliamentary committee and has so far commissioned no study or analysis of the future repercussions of the amendment on media pluralism. Ironically, the vote came only days after the publication of the European Commission's report on the Rule of Law, where the Commission noted problems in media ownership transparency and the absence of adequate regulation.

Press freedom and media pluralism in Greece continue to face critical and systemic challenges for yet another year. According to Lambrini Papadopoulou, Assistant Professor at the National and Kapodistrian University of Athens and coordinator of the MPM team for Greece, media plurality is particularly at risk, as significant concerns persist regarding transparency in the digital market and the concentration of media ownership despite various legislative initiatives by the government. In this media environment, media outlets encounter substantial economic difficulties and are experimenting with diverse revenue models in an effort to survive within a highly disrupted media ecosystem. Regarding editorial independence, the Greek expert points out that it is not safeguarded in practice, resulting in editorial content and the hiring and dismissal of editors-in-chief being influenced by political and commercial pressures. Media professionals also contend with unsatisfactory working conditions and various threats, including physical and legal, aimed at silencing critical or unfavorable content. Impunity for crimes against journalists remains a pressing issue, exemplified by the unresolved assassination of veteran crime reporter Giorgos Karaivaz.

In the domain of social inclusiveness, current data show a continuous underrepresentation of minorities and women in the media. Furthermore, the country's main media authority in the broadcasting field, the National Council for Radio and Television (ESR), faces serious challenges due to understaffing and insufficient resources to effectively monitor Greece's radio and TV stations. Most importantly, there

have been numerous accusations of political interference in its operations. The year 2023 was marked by highly controversial and potentially illegitimate procedures employed for the appointment of the new ESR board. On a positive note, in 2023, the Greek government made efforts to enhance transparency in media ownership, regulate the distribution of direct subsidies, and establish rules for the distribution of state advertising in the printed and electronic press through various legislative initiatives. However, the effectiveness of these measures remains to be seen.

The state of media pluralism in Malta has made little progress over the past year, and several issues remain unresolved or require attention. More specifically, the risks to market plurality and political independence in the media remain at high-risk levels. Additionally, increased challenges related to social inclusiveness and fundamental protections pose various concerns. Regarding the latter, issues related to freedom of information requests and the protection of journalistic work should be promptly and transparently addressed. According to Louiselle Vassallo, Senior Associate Academic at the University of Malta and coordinator of the MPM team for Malta until 2023, after the assassination of Daphne Caruana Galizia in 2017 many journalists felt they had to take a step back and were worried about the safety of their families. This concern persists, with some journalists still being very cautious and thinking twice about covering particular stories. On the other hand, the reaction from the journalistic community in Malta was amazing, with many examples of journalistic courage. Journalists face direct and economic threats, as well as threats in the form of harassment from groups, like trolling groups. For journalists and activists, combating these threats is very difficult and exhausting.

Furthermore, the case of SLAPPs, the lack of legal requirements, and the lack of enforcement in different areas continue to be major issues in Malta, leading to significant data gaps, negative impacts, and a general lack of transparency. “There isn't enough support for journalists as well in terms of journalism being recognized as the fourth pillar of the democracy in our Constitution, which it isn't, and the government is dragging its feet on reforms which are really needed. I think the IGM, which is the journalist association and not a Union here, really needs support, which is given, but they should be left to be independent when they work so they can self-regulate, because right now we have a regulator which is the broadcasting authority and they regulate mostly broadcast and online media and to a certain extent, but it shouldn't be that way,” the Maltese expert states. In this context, it is worth mentioning that in early 2024, the European Parliament approved an anti-SLAPP directive (Times of Malta, 2024), known as Daphne's Law in honor of assassinated Maltese journalist Daphne Caruana Galizia, who was the target of such lawsuits. The directive, which was published in the Official Gazette in April (Official Journal of the European Union, 2024), aims to provide cover and protect journalists and activists from SLAPPs, and the EU member states have two years to implement the directive.

The ownership of numerous media outlets by the main political parties, a distinctive feature of the country's media market, remains a significant concern, leading to polarization and influence on editorial direction, content, and regulation, impacting the population’s overall trust in the media. At the same time, the independence of the Broadcasting Authority is a concern, and public service media appears heavily influenced by the government and reliant on state funding. As the local media pluralism expert highlights, “We have political parties that own multi-platform media houses. The political parties are very polarized, especially the two main ones, and their ownership dictates their editorial line because they cannot go against the owner in this respect. There's a lot of pressure and self-censorship because someone who works for media or a platform owned by a political party will not run a story about a politician from that party.” She adds, “we joke in Malta that if you watch the news on

the PN (center-right Nationalist Party, in Maltese: Partit Nazzjonalista) station and the PL (center-left Labor Party, in Maltese: Partit Laburista) station, it's like living in a different country when you watch them side by side. The news is completely different." Finally, social inclusiveness in the Maltese media landscape continues to be a concern, with minorities being excluded and underrepresented in local media, while achieving gender balance remains an ongoing challenge.

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