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Media Pluralism Monitor 2016 Monitoring Risks for Media Pluralism in the EU and Beyond Country report: Bulgaria

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Centre for Media Pluralism and Media Freedom





TABLE OF CONTENT

1.	About the Project	1
2.	Introduction	2
3.	Results from the data collection: assessment of the risks to media pluralism	3
3.1.	Basic Protection (35% - low risk)	4
3.2.	Market Plurality (71% - medium risk)	5
3.3.	Political Independence (56% - medium risk)	6
3.4.	Social Inclusiveness (64% - medium risk)	7
4.	Conclusions	9
	Annexe 1. Country Team	10
	Annexe 2. Group of Experts	10
	Annexe 3. Summary of the stakeholders meeting	11

1. ABOUT THE PROJECT

1.1 OVERVIEW OF THE PROJECT

The Media Pluralism Monitor (MPM) is a research tool that was designed to identify potential risks to media pluralism in the Member States of the European Union. This narrative report has been produced within the framework of the first pan-European implementation of the MPM. The implementation was conducted in 28 EU Member States, Montenegro and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2 METHODOLOGICAL NOTE

The CMPF cooperated with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the cases of Malta and Italy where data collection was carried out centrally by the CMPF team. The research was based on a standardised questionnaire and apposite guidelines that were developed by the CMPF. The data collection was carried out between May and October 2016.

In Bulgaria, the CMPF partnered with Foundation Media Democracy, which conducted the data collection, commented the variables in the questionnaire and interviewed relevant experts. The report was reviewed by CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe 2 for the list of experts).

To gather the voices of multiple stakeholders, the Bulgarian team organized a stakeholder meeting, on October 11th, in Sofia. An overview of this meeting and a summary of the key points of discussion appear in the Annexe 3.

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of 20 indicators - five per each thematic area:

Basic Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political control over media outlets	Access to media for minorities
Protection of right to information	Media ownership concentration (horizontal)	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Cross-media concentration of ownership and competition enforcement	Media and democratic electoral process	Access to media for people with disabilities
Independence and effectiveness of the media authority	Commercial & owner influence over editorial content	State regulation of resources and support to media sector	Access to media for women
Universal reach of traditional media and access to the Internet	Media viability	Independence of PSM governance and funding	Media literacy

The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk. On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk¹.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report.

1 For more information on MPM methodology, see the CMPF report “Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2016 in EU-28, Montenegro and Turkey”, <http://monitor.cmpf.eui.eu/>



2. INTRODUCTION

The total population of Bulgaria is 7 153 784 (2015).² According to the latest census (2011), the Bulgarian ethnic group is the largest with 84.8% of the Bulgarian population. The Turkish ethnic group is the second largest and making up 8.8%. The Romany group is the third and accounts for 4.9%. These ethnic groups are recognized by the law. The adult literacy rate reaches 98.4%.³ Bulgarian is the mother tongue for 85.2% of the population, Turkish being the second with 9.1% and Roma with 4.2%.⁴

The economic situation is relatively stable, but at low level. In 2015, Bulgaria was the member state with the lowest per-capita GDP, at 53% below the EU average.⁵ Bulgaria has remained the poorest country in the EU. Unemployment rates of the population aged 15 and over are 9.1% (2015).⁶ The economy faces many serious problems, including, amongst others, corruption – corruption perceptions score ranks 69 of 168 countries (2015).⁷

In the course of 2015 and 2016 there were tensions in the ruling coalition, which is conformed by parties of very diverse ideologies – the powerful centre-right GERB and its partners Reformist Bloc, Patriotic Front and ABC. The opposition is weak and fragmented. International affairs have been among the main causes for instability in the past few years. Refugee wave in Europe along with Russia's military intervention in Syria and other key events have had a strong impact on the main topics discussed in political debates and taken up by the media. Against this background, many media have contributed to the escalation of polarization in society. The use of hate speech in the media has increased significantly. Extreme views close to racism and xenophobia have become frequent in some online media, tabloid newspapers, party TVs and on social networks.

The media market is diverse but still highly dependent on political and economic influences. The total number of newspapers in 2015 is 283 (the dailies are 51).⁸ The number of newspapers per capita is 37.2.⁹ There are 116 registered TV operators. The radio operators are 84.¹⁰ The total TV and radio revenues are respectively 214 595 000 and 36 230 000 EUR, which is indicative of a general decrease in the total revenues in both sectors.¹¹ According to other data, the investments in advertising in 2015 are 169 150 000 EUR on a net basis, which is an increase of 8.3% compared to 2014¹², along with a growth of the gross advertising budgets in four sectors: Internet (plus 27.5% in 2015 compared to the previous year), outdoor advertising (plus 11.6%), radio (plus 8%) and television (plus 2.7%).¹³

In 2015, 59.1% of the households had access to the internet at home (a growth of 2.4%, compared to the previous year). The relative share of households using broadband internet connection was 58.8%.¹⁴

The 2016 World Press Freedom Index of Reporters Without Borders places Bulgaria at 113th position among 180 monitored countries (last place in the EU).¹⁵ In the Freedom of the Press ranking of Freedom House, in 2015 Bulgaria occupies the 78th position – out of 199 countries and territories.¹⁶ Freedom House defines Bulgarian media as 'partly free'. The 2016 Media Sustainability Index by IREX indicates, in 2015, there was a rise in crimes against journalists, including harassment by public figures and violent attacks.¹⁷ The Mapping Media Freedom Index reports eight cases of attacks and threats to the physical safety of Bulgarian journalists (from May 2014 to April 2016), as well as other cases of threats to media freedom in the country (harassment, censorship, etc.).¹⁸ A number of Bulgarian non-governmental organizations (Association of European Journalists – Bulgaria, Foundation Media Democracy, etc.) indicate similar problems: interventions by media owners, advertisers, state authorities and politicians in the work of the media, spread of self-censorship, etc.

2 See: <http://www.nsi.bg/en/content/6704/population-districts-municipalities-place-residence-and-sex> (accessed: 29 August 2016).

3 See: <http://www.uis.unesco.org/Education/Documents/literacy-statistics-trends-1985-2015.pdf> (accessed: 30 August 2016).

4 See: <http://www.nsi.bg/sites/default/files/files/pressreleases/Census2011final.pdf> (accessed: 29 August 2016).

5 See: http://ec.europa.eu/eurostat/statistics-explained/index.php/GDP_per_capita_consumption_per_capita_and_price_level_indices (accessed: 1 September 2016).

6 See: <http://www.nsi.bg/en/content/6503/unemployed-and-unemployment-rates-national-level-statistical-regions-districts> (accessed: 29 August 2016).

7 See: <http://www.transparency.org/cpi2015/> (accessed: 1 September 2016).

8 See: <http://www.nsi.bg/en/content/4577/issued-newspapers-periodicity> (accessed: 29 August 2016).

9 See: <http://www.nsi.bg/en/content/4573/issued-newspapers> (accessed: 29 August 2016).

10 See: <http://www.nsi.bg/en/content/4631/tv-operators> (accessed: 29 August 2016) and <http://www.nsi.bg/en/content/4621/radio-operators> (accessed: 29 August 2016).

11 See: <http://www.nsi.bg/en/content/4635/revenue-and-expenditure-tv-operators> (accessed: 29 August 2016) and <http://www.nsi.bg/en/content/4625/revenue-and-expenditure-radio-operators> (accessed: 29 August 2016).

12 See: <http://www.piero97.com/en/Media-market?yid=39&bid=40> (accessed: 2 September 2016).

13 See: <https://www.piero97.com/en/Media-market?yid=39&bid=41> (accessed: 2 September 2016).

14 See: http://www.nsi.bg/sites/default/files/files/pressreleases/ICT_hh2015_en_CB5PDL6.pdf (accessed: 29 August 2016).

15 See: <https://rsf.org/en/ranking> (accessed: 1 September 2016).

16 See: https://freedomhouse.org/sites/default/files/FH_FOTP2016Report_Final_04232016-EMBARGOED.pdf (accessed: 1 September 2016).

17 See: https://www.irex.org/sites/default/files/u105/EE_MSI_2016_Bulgaria.pdf (accessed: 1 September 2016).

18 See: <https://mappingmediafreedom.org/#/> (accessed: 1 September 2016).



3. RESULTS FROM THE DATA COLLECTION: ASSESSMENT OF THE RISKS TO MEDIA PLURALISM

In the Bulgarian case, high risks for media pluralism were detected primarily in the areas of ‘Market Plurality’ and ‘Political Independence’. Three of the ‘Market Plurality’ indicators point toward a particularly high risk: ‘Media ownership concentration (horizontal)’ (96%), ‘Commercial and owners’ influence over editorial content’ (92%) and ‘Cross media concentration of ownership and competition enforcement’ (89%). Two indicators in the ‘Political Independence’ domain point to high risk: ‘State regulation of resources and support for media sector’ (97%) and ‘Political control over the media outlets’ (79%).

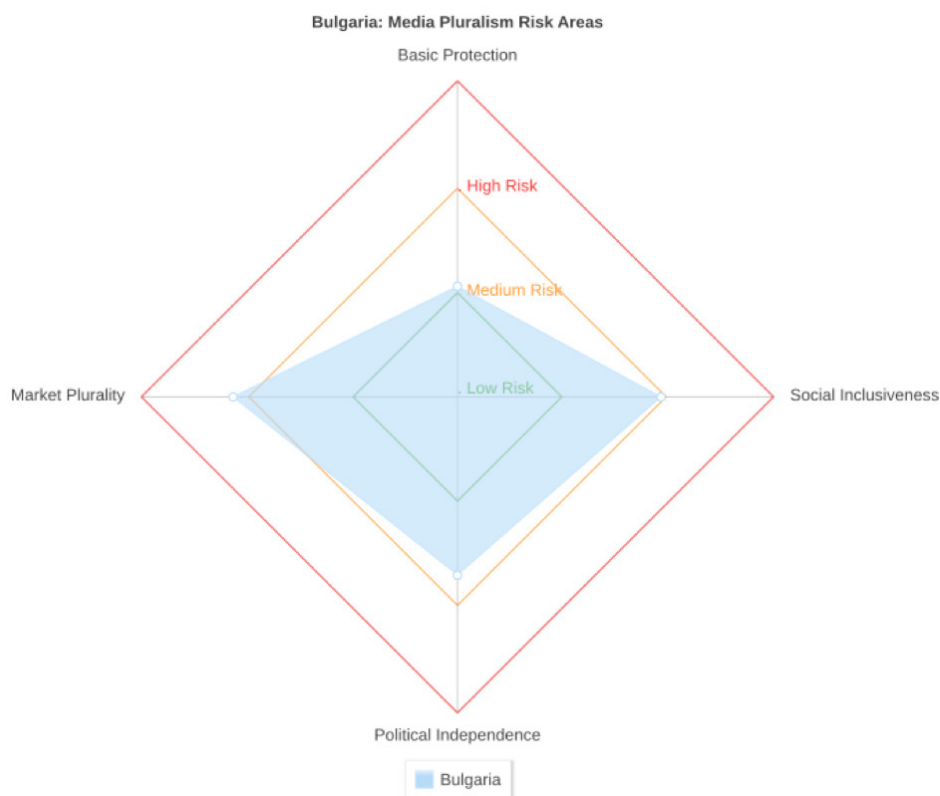
There are also significant risks to media pluralism in Bulgaria identified within the ‘Social Inclusiveness’ area. Two indicators within this domain face a particularly high risk: ‘Media literacy’ (88%) and ‘Access to media for regional/local communities and community media’ (75%).

The area of ‘Basic Protection’ scores low to medium risk. The main problems here are identified within the indicator ‘Journalistic profession, standards and protection’ (50%).

To sum up the results of the study, the three major barriers to media pluralism refer to allocation of state advertising, interference in editorial content and concentration of ownership.

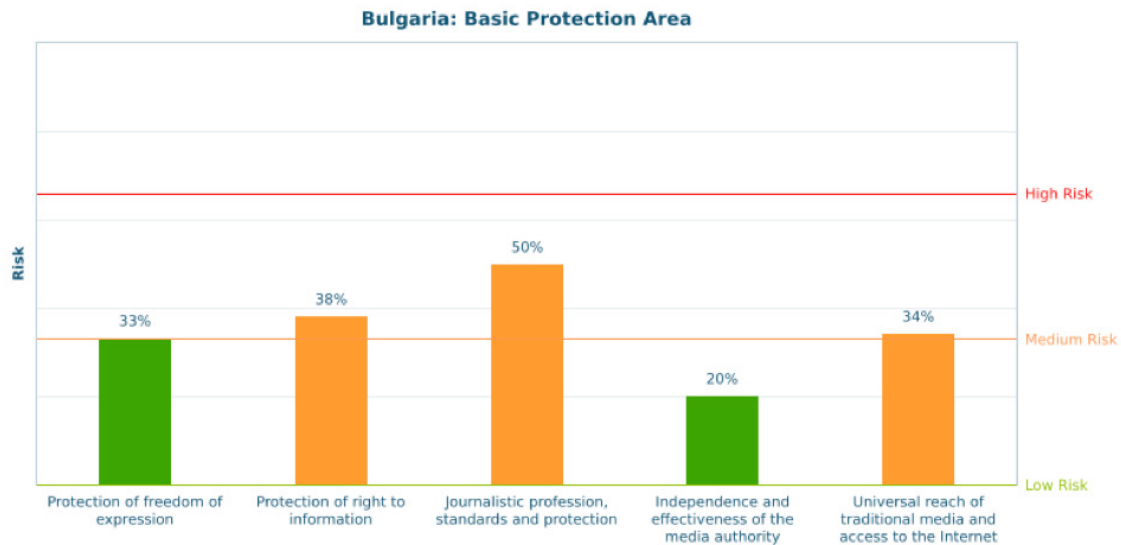
Two indicators are clearly outlined as scoring low risk: ‘Media and democratic electoral process’ (18%) and ‘Independence and effectiveness of the media authority’ (20%). Positive results in these areas are mostly due to available policies and legal provisions.

As a whole, the mixed performance of Bulgaria mainly refers to the fact that while in most cases the legal framework introduces necessary standards, they are frequently not effectively implemented in practice. Even within indicators with lowest risk there are often discrepancies between legal provisions and implementation. These peculiarities must be taken into account when making an overall assessment of media pluralism in Bulgaria. At the same time it should be pointed out that there have been some new developments in the media sector which happened after the 2016 MPM study was conducted (media law amendments, new regulation proposals, transformations of media outlets and other). Such ongoing developments influence the state of media pluralism in the country and have the potential to rapidly change the whole picture.



3.1 BASIC PROTECTION (35% - MEDIUM RISK)

The Basic Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have competence to regulate the media sector; and the reach of traditional media and access to the Internet.



In the area of Basic Protection Bulgaria scores low to medium risk.

Freedom of expression (33% overall indicator risk) is explicitly recognized in the Constitution and media legislation. Bulgaria has ratified the relevant international documents in this regard, including ICCPR (in 1970) and ECHR (in 1992). Restrictions upon freedom of expression are clearly defined in the Constitution, the Penal Code and in the Radio and Television Act. In recent years, however, laws treating other subject areas, the financial sector in particular, have been implemented in ways that restrict the media. The Financial Supervision Commission, for example, has imposed record fines against several media outlets (Capital, Mediapool, Bivol, Zov News) in pursuit of disclosure of their sources of information. In practice, there are serious risks in terms of freedom of the media and of journalists. A wide range of local and international monitoring organizations (Reporters Without Borders, IREX, Freedom House, The Association of European Journalists – Bulgaria, Bulgarian Helsinki Committee and other) point out lasting and ongoing practices of systematic violations such as threats and harassment by public figures and institutions against journalists, corporate and political pressure on media, etc. Freedom of expression of citizens who are not journalists is generally respected, but in some occasions economic and political pressure is used for hindering individual citizens or entire professional communities from freely expressing an opinion. Defamation has not been decriminalized but the law provides for sufficient legal defences. The state and the ISPs generally refrain from filtering or blocking online content in an arbitrary way.

Protection of the right to information is at medium risk (38%). Although there are adequate legal provisions in this regard, problems with the implementation of the law persist. Appeal procedures are occasionally misused. There is an ongoing tendency of institutions not to respond to requests for access to information (so called silent refusals). Media professionals indicate that public institutions are becoming more and more creative in denying information to the media and to investigative journalists in particular.

The indicator on Journalistic profession, standards and protection scores medium risk (50%). Despite the existence of a few journalistic organizations, in practice not many active journalists are unionized. Professional associations are not particularly effective in guaranteeing editorial independence. Working conditions for journalists face high job insecurities. Many media companies do not undertake to protect their journalists and are increasingly offering journalists contracts for services instead of full-time employment contracts, and little if any social benefits. Although there are self-regulatory mechanisms, disrespect of professional standards is a common practice.

The indicator on Independence and effectiveness of the media authority represents low risk (20%). However, there are important structural deficiencies leading to medium risk in some of the indicator's variables. The independent specialized body which regulates media services in Bulgaria is the Council for Electronic Media (CEM). Two of its members are appointed by the President; the other three are elected by the Parliament. Election of members of CEM is often criticized by experts and professionals for being a political decision. Citizen participation in nominating CEM

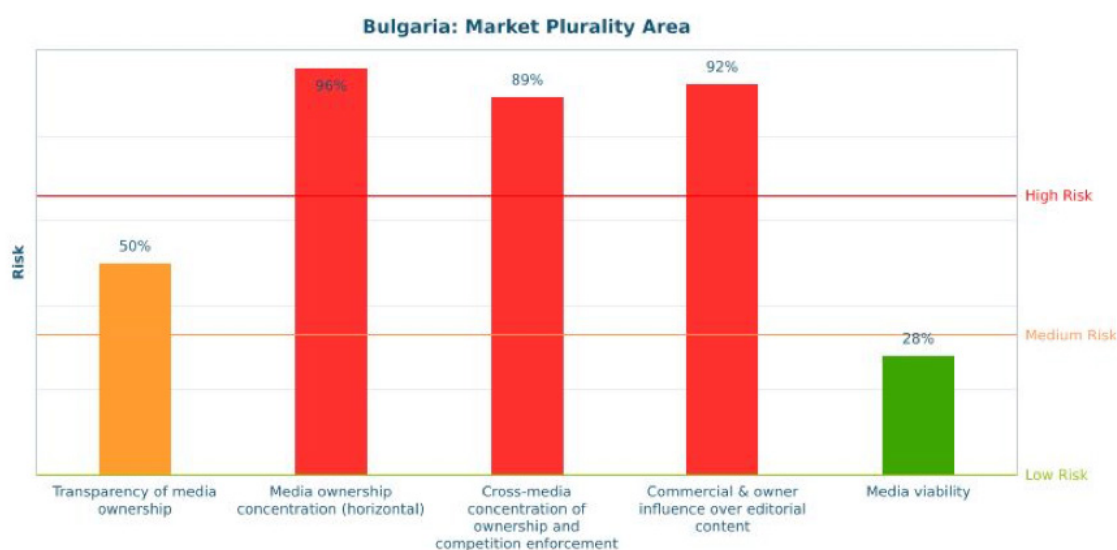


members is not guaranteed. In addition, in 2015 and 2016, there were several campaigns against the CEM in the context of political confrontations.

Reach of traditional media and access to the Internet is at medium risk (34%). Public television channels cover 96.2% of the population. More than 99% have access to public radio broadcasting. The leading three ISPs hold 60% market share.

3.2 MARKET PLURALITY (71% - HIGH RISK)

The Market Plurality indicators examine the existence and effectiveness of the implementation of transparency and disclosure provisions with regard to media ownership. In addition, they assess the existence and effectiveness of regulatory safeguards to prevent horizontal and cross-media concentration of ownership and the role of competition enforcement and State aid control in protecting media pluralism. Moreover, they seek to evaluate the viability of the media market under examination as well as whether and if so, to what extent commercial forces, including media owners and advertisers, influence editorial decision-making.



Market Plurality is one of the most problematic domains in the Bulgarian media realm.

The indicator on Transparency of media ownership scores medium risk (50%). Although there are formal legal provisions for disclosure of media ownership (Mandatory Deposition of Print and Other Works Act, Radio and Television Act, Commercial Register Act), the present legal requirements are not effectively implemented in practice. In some cases the actual owners of given media remain hidden to the public. Even though envisaged by law, sanctions for not complying with the transparency obligations have never been imposed on media outlets. In recent years, local and international organizations have stressed namely on the lack of ownership and financial transparency.

The level of horizontal concentration of media ownership indicates extremely high risk (96%). Media legislation does not contain specific thresholds in order to prevent a high degree of horizontal concentration of ownership. This refers to all media sectors. General rules in the competition law do not include specific provisions for the media market in particular. At the same time the actual level of concentration is impossible to track due to a deficit of precise data, which is considered as a risk itself. Full data on total revenues (including advertising, sales, subscriptions, etc.) generated in the different media sectors are not available. Accessible information on market shares is based only on partial advertising revenue data. Based on such incomplete information, the Top 4 concentration calculations show a high level of concentration in the audiovisual sector – 92%, and 57% concentration in the newspaper sector. There are no data regarding the radio sector. Available figures on Top 4 audience shares are also indicative of generally high concentration: 82% in the television sector, 81% in the radio sector and 35% in the newspaper market.

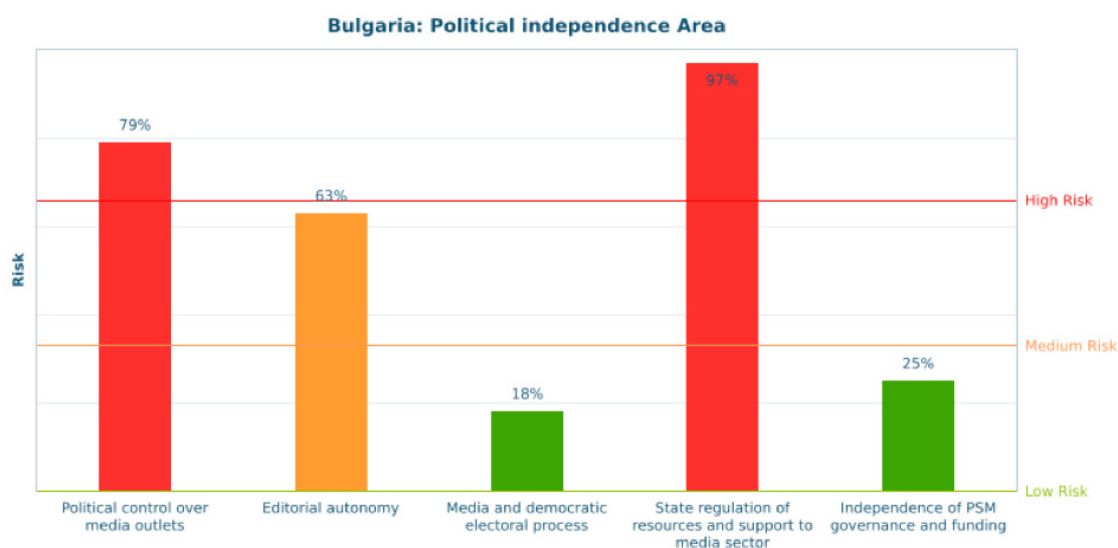
Cross-media concentration of ownership and competition enforcement is another high-risk indicator (89%). Again, media legislation does not provide for specific thresholds in order to prevent a high degree of concentration. Data insufficiency in terms of media ownership and market shares does not allow making an accurate evaluation of the actual cross-media concentration in the national market. In addition, the Commission for the Protection of Competition, the relevant regulatory authority, does not take into account, implicitly or explicitly, considerations about media pluralism when applying competition rules to the media sector. There are also no regulatory safeguards ensuring that State funds granted to PSM do not cause disproportionate effects on competition.

Commercial and owner influence over editorial content is the next indicator scoring high risk (92%). There are serious shortcomings of legal and self-regulatory instruments ensuring editorial independence: no mechanisms granting social protection to journalists in case of changes of ownership or editorial line; no regulatory safeguards ensuring that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests; no measures stipulating that the exercise of the journalistic profession is incompatible with activities in the field of advertising. This corresponds to a situation in which media owners and other commercial entities systematically influence editorial content. The common practice of pressure over editorial independence has been illustrated and criticized in a number of studies and reports by monitoring organizations.

With regard to Media viability, an indicator scoring low risk (28%), it should be taken into consideration that data are controversial. There are seemingly positive tendencies in the online sector: an increase in the number of individuals using the Internet, in the percentage of people using mobile devices to access the Internet and in the expenditure for online advertising. However, there is a decrease in revenues in the audiovisual, radio and newspaper publishing sectors. Some media companies develop alternative sources of revenue and such measures help them to survive but not to make financial profits and to invest in the media business.

3.3 POLITICAL INDEPENDENCE (56% - MEDIUM RISK)

The Political Independence indicators assess the existence and effectiveness of regulatory safeguards against political bias and political control over the media outlets, news agencies and distribution networks. They are also concerned with the existence and effectiveness of self-regulation in ensuring editorial independence. Moreover, they seek to evaluate the influence of the State (and, more generally, of political power) over the functioning of the media market and the independence of public service media.



Risk levels within the Political Independence area are uneven.

Political control over media outlets indicates high risk (79%). There are general legal provisions against political interference, but media ownership as well as other direct and indirect control by politicians is not explicitly prohibited or limited by law. In Bulgaria, there are currently two party television channels (Alfa and SKAT); six newspapers are officially owned by MP Delyan Peevski. There are systematic cases of conflict of interests between owners of media outlets and the ruling parties, partisan groups and politicians. Political dependences and influences affect both national and local media. The assessments indicate high level of political control in the print media sector, medium level regarding the television sector and relatively weak control over the radio. Although the leading news agency is funded by the State, it has the reputation of being politically independent. The leading print media distribution network, however – the Lafka brand owned by Tabak Market – has been considered by experts as politically affiliated due to the participation of MP Delyan Peevski in the ownership of the company behind the network. Even though Peevski announced he was selling his share in March 2016, serious doubts remain about his influence in the distribution business.

Editorial autonomy in general is evaluated as of a medium risk (63%). There are no regulatory safeguards to guarantee autonomy when appointing and dismissing editors-in-chief. In the two party television channels, the procedures for



the appointment of editors-in-chief are thoroughly dependent on the decisions of the respective party headquarters. Influences over other private media are difficult to prove. Regarding the PSM, there are no registered cases of interference in the appointment and dismissal procedures for editors-in-chief. Editorial independence is declared as a basic value in the existing self-regulatory rules. In practice, though, media professionals claim it is a wide-spread practice that MPs, ministers, heads of state agencies and other political figures would call or send SMS to owners, editors-in-chief and journalists in order to influence the editorial content. One of the most effective mechanisms of political control over the media is through advertising funds distributed by ministries and local municipalities.

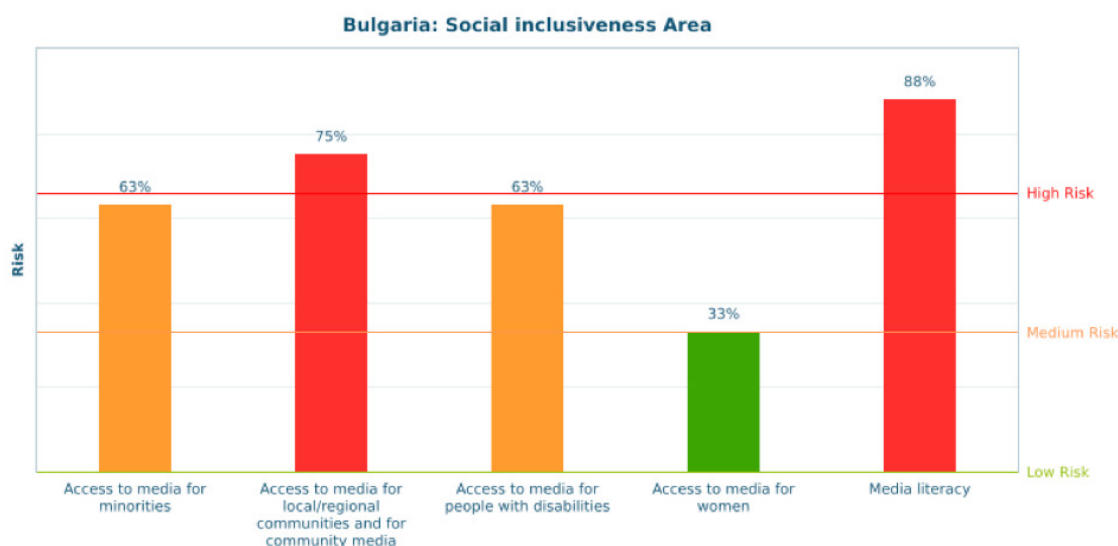
The Media and democratic electoral process indicator scores low risk (18%) mainly due to the existing legal provisions aiming at fair representation of political viewpoints on PSM and on private channels. Law implementation, regulation by the media authority in practice and analyses of media content are also indicative of pluralism on the PSM during elections. Coverage of electoral campaigns on the leading private television channels is usually fair and balanced, with a few exceptions of channels and single journalists demonstrating political bias.

State regulation of resources and support to the media sector scores the highest risk of all MPM indicators (97%). There are no direct or indirect state subsidies to media other than PSM. There are also no regulatory safeguards for fair and transparent allocation of state advertising to media outlets. The actual practice of distribution of state advertising is neither clearly motivated, nor is safeguarded against pressure over the media.

The level of Independence of PSM governance and funding is at low risk (25%). In fact, this is the indicator with the highest degree of correspondence between legal provisions and implementation in practice, especially regarding the governance. Funding, however, is problematic. The main mechanism of financing the PSM is the state budget subsidy. The subsidy, calculated according to a ‘per hour of programming’ principle, is decided by the government on an annual basis and is voted by the National Assembly. The Government decides on the amount of financing without public discussion. The Directors General of the PSM and experts claim that budgets are insufficient and insist for a more sustainable and predictable model of financing.

3.4 SOCIAL INCLUSIVENESS (64% - MEDIUM RISK)

The Social Inclusiveness indicators are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country’s media literacy environment, as well as the digital skills of the overall population.



There are significant risks to media pluralism in Bulgaria identified within the ‘Social Inclusiveness’ area.

The Access to media for minorities indicator scores medium risk (63%). The Radio and Television Act includes broadly formulated obligations of the PSM regarding minorities’ access to airtime. In practice, the Bulgarian National Television (BNT) and the Bulgarian National Radio (BNR) are commonly inclined to cover minority-related events and to provide airtime to minority representatives. In general, however, reporting is not based on a special media policy but is rather occasional and event-driven. There is not also a clear principle of proportionality between the



access to airtime and the size of the minority population. Regarding private radio and television channels as well as newspapers, content dedicated to minorities is overall not proportional to the size of the minority population. The minorities are placed in a disadvantageous position in this respect. As a whole, private media coverage is focused mostly on Roma-related issues, the second largest minority, but reporting is often biased, scandalous and driven by negative prejudices.

The level of risk regarding The access to media for local/regional communities is evaluated as high (75%). The Council for Electronic Media implements its legal obligations to grant licenses for regional program services. The PSM adhere to their obligations by law to create national and regional programmes, programmes for Bulgarians abroad and for Bulgarian citizens whose native language is not Bulgarian, including in their language. Regional and local media, however, are not supported by authorities through subsidies or policy measures. In fact, studies illustrate that instead of developing such measures, local authorities rather try to control regional media. Community media are neither envisaged in law, nor do they exist.

Access to media for people with disabilities indicates medium risk (63%). Policy making in this regard is underdeveloped, and relevant measures are not effective enough. Although media service providers are encouraged by law to develop accessible content for people with disabilities, audio descriptions for blind people have not been introduced yet, while audiovisual content adapted for people with hearing impairments is scarce. Only the PSM BNT provides content adapted for people with hearing impairments on a regular basis, albeit limited.

Access to media for women is the least problematic indicator within the domain of social inclusiveness (low risk of 33%). The PSM have not elaborated gender equality policy yet. However, in practice female staff prevails on the PSM (journalists, editors, administration)¹⁹ and 60% of PSM management board members are women (on the management board of the public service television all five members are women). As for content, it is the journalists, editors and producers themselves who decide whether to adhere to any gender balance when preparing the programmes and inviting guest experts.

The level of media literacy in the country indicates the highest risk (88%) in the area of social inclusiveness. In Bulgaria, policy on media literacy has not been developed and there are no significant measures undertaken by state institutions. Media literacy is absent from compulsory primary and high school education curriculum. School teaching on this matter is scarce and is based on individual initiatives and projects. Media literacy activities are mainly carried out in non-formal education and by the civil society. These activities are only nascent, fragmented and limited in reach – targeted primarily at children and young people and implemented mainly in the capital city of Sofia.

19 According to interviews with PSM key personnel conducted by the country team for the purpose of the MPM.



4. CONCLUSIONS

The results of the 2016 MPM for Bulgaria indicate significant risks to media pluralism in the country. The main problems are in the areas of media concentration, editorial independence, state regulation of resources and social inclusiveness. Amongst other, fostering positive developments requires policy measures such as:

In the Basic Protection area:

- Improvement of legislation on the composition, independence and effectiveness of the Council for Electronic Media, the national media authority, by providing with civil society representatives in the nomination of CEM members, in the composition of the body and in the monitoring of CEM's decisions and accountability.
- Protection of the right to information through more effective implementation of the Access to Public Information Act by state institutions.
- Promotion of campaigns for better professional protection of journalists (by NGOs, professional organizations, media stakeholders).

In the area of Market Plurality:

- Fostering implementation of media ownership transparency measures by the relevant regulatory authorities.
- Introduction of a 'Media Plurality' test in cases of media mergers (in the law and in the competencies of the regulatory authorities).
- Constant and sustainable monitoring of advertisers' and media owners' influence over editorial content – to be conducted by NGOs in order to help prevent commercial interference.

In the area of Political Independence:

- Reassessment of the Radio and Television Act regarding PSM independence and funding.
- Introduction of transparent and non-discriminatory regulation of governmental distribution of state advertising and public funds to the media.
- Effective enforcement of the provisions on distinguishing paid from editorial content in political coverage.

In the Social Inclusiveness area:

- Development of public policy on media literacy, and the introduction of the media literacy subject in school curriculum and in non-formal media education.
- Launching a special channel devoted to culture, with a solid focus on minority, gender and social issues, within the public-service BNT network – in order to improve the representation of diverse Bulgarian minorities and social groups.
- Increasing the access to media content for people with disabilities (by both PSM and private media).
- Introduction of policy measures to support regional and local media with regard to their financial sustainability, distribution, political and economic independence (by the government, local authorities, NGOs).

Finally, for a most precise monitoring and evaluation of media pluralism in the country, there is a general need for reliable and accessible media market data (market shares of owners in all media sectors, circulation and distribution figures, data on online media consumption and concentration, etc.). Such data could be provided by transparent and unbiased state, private or non-governmental institutions.



ANNEXE 1. COUNTRY TEAM

The Country team is composed of one or more national researchers that carried out the data collection and authored the country report.

First name	Last name	Position	Institution	MPM2016 CT Leader (please indicate with X)
Orlin	Spasov	Executive Director	Foundation Media Democracy	X
Nelly	Ognyanova	Professor	Sofia University "St. Kliment Ohridski"	
Nikoleta	Daskalova	Researcher	Foundation Media Democracy	

ANNEXE 2. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
Anna	Goranova	Executive Director	Association of Bulgarian Broadcasters - ABBRO
Borislav	Shabanski	Chief Secretary	Council for Electronic Media
Ivo	Draganov	Professor	New Bulgarian University
Kristina	Hristova	President	Association of European Journalists – Bulgaria
Mehti	Melikov	Executive Director	Foundation National Council for Journalistic Ethics
Ruzha	Smilova	Professor	Sofia University "St. Kliment Ohridski"
Vesela	Vatseva	Executive Director	Bulgarian Association of Regional Media



ANNEXE 3. SUMMARY OF THE STAKEHOLDERS MEETING

- **Date**

11 October 2016

- **Place**

Information Centre of the EU in Sofia, Bulgaria

- **Participants**

The meeting was attended by media professionals, representatives of non-governmental organisations, media experts and participants in the group of experts.

- **Key topics discussed**

In the first part of the meeting the country team presented the MPM research tool and the main results of the 2016 Bulgarian data collection and risk evaluations. A discussion on the results for some of the indicators followed. The guests were particularly interested in the MPM methodology concerning the calculation of risk levels for indicators such as Protection of Right to Information, Media Viability, Media and Democratic Electoral Process, etc.

- **Conclusions**

The MPM is considered to be a very valuable research tool which provides an in-depth analysis of the risks to media pluralism in all important areas. However, the risk levels for some indicators within a given domain may look surprisingly incoherent for external observers if additional explanations are not provided. An illustrative example in the Bulgarian case refers to the Political Independence area where political control over the media outlets is at high risk while the indicator on the media and democratic electoral process scores low risk. That is why further listing of all questions and variables covered, including a note on their scope, would make the conclusions and risk evaluations even more methodologically transparent to the general public.

There is a general consensus on the main identified risks especially when the country-specific nuances are presented in addition to the risk level scores. With regard to the Protection of Right to Information indicator in particular, the participants in the meeting insisted on a positive evaluation of the Access to Public Information Act, naming it one of the most precise in Europe. In terms of the market plurality specifics in Bulgaria, the meeting attendees recommended that not only horizontal and cross-media concentration but also ownership of both media and non-media enterprises should be taken into consideration as well.

The low level of risk on media viability in the country is considered as problematic. It is argued that the calculation of the risk in question puts too much weight on the variables related to the online media as opposed to the variables on the traditional media sectors, where the trends are more contradictory.

The meeting attendees agreed that the deficiency of media market data hinders the precise evaluation of the risks to media pluralism.



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