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Centre for Media Pluralism and Media Freedom (CMPF) Working Paper Series on 'Freedom and Pluralism of the Media, Society and Markets' benefits from contributions from the CMPF's fellows as well as from leading scholars and experienced practitioners interested in and focused on the subject matter. The Working Papers Series aims at assessing theoretical issues, specific policies, and regulatory questions.

The Centre for Media Pluralism and Media Freedom is co-financed by the European Union. This initiative is a further step in the European Commission's on-going effort to improve the protection of media pluralism and media freedom in Europe and to establish what actions need to be taken at European or national levels to foster these objectives.

The aim of the EUI Centre for Media Pluralism and Media Freedom is to enhance the awareness of the importance of freedom and pluralism of the media, to contribute to its protection and promotion and to develop new ideas among academics, policy makers, regulators, market stakeholders, journalists, and all other directly involved professionals who take part in the public debate.

Abstract

Raise your hand if you have never heard about countries' rankings on freedom of expression, freedom of the media, media independence, which are produced every year by NGOs like Reporters without Borders or Freedom House. These organizations produce popular indices that rank countries worldwide according to different sets of indicators examining freedom of expression and of the media. These indices are influential and much quoted in policy documents and they also have some impact on international relations.

The aim of this paper is twofold: a) to present, for the first time, a ranking of European Union Member States, Montenegro and Turkey, in terms of media pluralism, deriving it from the results of the Media Pluralism Monitor conducted by the CMPF at the EUI (the 2016 round, published in 2017); b) to compare this new MPM ranking with the scores and rankings provided by the indices of Reporters without Borders and Freedom House published in 2017 and relating to the same EU and accession countries.

The MPM ranking is clearly different from the other two indices. These two indices, at least in the results, appear very similar, showing very strong correlations. A comparison exercise shows that the relatively mild correlation between the MPM and the other two indices may be explained by external factors, like a country's population and GDP per capita, and it provides a preliminary interpretation of the differences.

Keywords

1. Introduction: The New MPM Index and the Other Indices to be Compared

Since 2013, the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute (EUI) has annually assessed and scored the risks to media pluralism and media freedom in EU member states and some candidate countries, using a complex measuring tool, the Media Pluralism Monitor (MPM). The MPM tool was originally inspired by the Independent Study on "Indicators for Media Pluralism in the Member States – Towards a Risk-Based Approach" (KU Leuven, 2009)). The tool has been heavily revised and operationalized by the CMPF's researchers, essentially through a repeated process of simplification, concentration on news and current affairs, and the introduction of digital variables. The practical outcome of the MPM is a series of four different scores for each country examined by the instrument. These scores measure the risks to media pluralism for a given country having regard to four main areas of analysis: Basic Protection, Market Plurality, Political Independence and Social Inclusiveness. In this paper, for the first time, the four scores will simply be averaged to propose a new "ranking" of the risk to media pluralism in the countries examined by the MPM.

According to Schneider (2014) more than 200 organisations in the world (mostly NGOs) support and, in many cases, monitor, media freedom violations and they produce rankings, indices or reports on the levels of freedom of expression in a single, or in many, country(ies). While most of these organisations work at the national level, some of them have a wider scope and a wider audience and impact. Reporters without Borders (RWB -in French, Reporters sans Frontières - RSF), Freedom House (FH), The International Research & Exchanges Board (IREX), are some of the most popular indices or studies that provide numerical scores for the analysed countries. Amongst the three just mentioned, IREX does not cover EU member states.

The indices developed by Reporters Without Borders and Freedom House, therefore, are those that can be compared with the new index extracted from the Media Pluralism Monitor, both in terms of outcome (numerical score) and in terms of the scope of application (both include EU member states).

2. The Media Pluralism Monitor

a. Aim of the Monitoring Tool

As mentioned above, 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. The instrument is designed not so much to diagnose the media pluralism situation, but mostly to flag up certain issues in the legal, political and economic areas that carry the risk of jeopardising media pluralism.

The Media Pluralism Monitor lists and measures the conditions that constitute a risk for media pluralism in any given EU country. From an academic point of view, this approach provides a granular analysis of the media context at the country level. From a policy point of view, the MPM provides very detailed data and a grid on which to focus on potential problems, it is thus similar to an early warning system. The focus of the MPM is not just what the deficiencies of a media system are, but whether there are the structural conditions that can lead to the deterioration of freedom of expression and media pluralism in a given context. The rationale behind the Media Pluralism Monitor is the identification of concrete indicators with which to assess, in an objective way, the levels of risks for media pluralism in a given country, that is, for "risk assessment" "*a systematic analytical process based on predetermined risk criteria, professional judgment and experience to determine the probability that an adverse condition will occur*" (EC Working document, 2007). This analysis is, then, balanced by some data that constitute a sort of "reality check": this allows for the assessment of the situation for a given country with regard to both the conditions that are conducive to more or less pluralism, and the effective conditions for the country itself.

b. Funding

The Media Pluralism Monitor is funded by the European Union under a Preparatory Action of the European Parliament.

c. Object of the Monitoring

Another assumption that is behind the Media Pluralism Monitor is that an assessment of media pluralism should not be limited to the measurement of the level of concentration in the media market, but must be holistic, therefore taking into account many different areas and perspectives that are relevant when describing a media system that serves a democratic society. The Media Pluralism Monitor thus organises the risks to media pluralism into four main areas: Basic Protection, Market Plurality, Political Independence and Social Inclusiveness. This categorisation allows for an assessment that encompasses the different components and meanings of "media pluralism". These four areas are assessed according to the scoring of 20 indicators and 200 variables in total. The indicators cover a broad notion of media pluralism that encompasses political, cultural, geographical, structural and content-related dimensions. All types of media are covered: public service, commercial, community media, new media and online platforms (CMPF, 2015; CMPF, 2016; CMPF, 2017).

Figure 1. MPM areas and indicators

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

d. Methodology

The methodology of the Monitor relies on a sophisticated questionnaire that is completed by MPM teams made up of national country experts who follow a common and standardised set of instructions, including indications of sources and consistency checks. A second group of external experts, including national stakeholders and experts in the area, conduct a review of the answers that required a qualitative type of measurement and/or that lacked measurable and easily verifiable data. In order to ensure the comparability of the answers and the consistency of their quality, the CMPF centrally monitors the data collection and raises questions in those cases where inconsistent or incomplete answers were provided by the country teams. This proved to be essential in a cross-national study of this size and type (CMPF, 2017).

The 200 variables included in the MPM are clustered into sub-indicators, and sub-indicators into indicators. The indicators contribute to making up each of the four MPM areas (five indicators per area). Each variable is a question and has been classified as belonging to one of the four question types: Legal existence (L-e) questions, which are focused on whether or not a particular provision exists in a country's legal framework; Legal implementation (L-i) questions, to examine whether due process is in place to ensure the effectiveness of the legal safeguard; economic (E) questions were designed to assess

the risk based on the economic structure of the media market (e.g., market revenues, audience shares); Socio-political (S) questions describe the actual practice and the effective situation in reality. In order to determine the risk for each variable, sub-indicator and indicator, a standardised formula is applied to the entire MPM questionnaire. Answers to the Legal-existence (L-e) questions, whose response type is yes/no, are coded as 0 or 1. Questions with a three-option reply (low, medium, high risk) are coded as 0, 0.5 or 1, according to their risk assessment. The same calibration is applied to the Economic questions (E), whose answers were firstly transformed into qualitative replies (low, medium, high risk), based on set benchmarks.

To better capture the specificities of the national contexts, and to allow for the exclusion of questions which are irrelevant, or that are not applicable to a country's media system, the CMPF has developed the possibility to answer using the options 'not applicable' and 'no data' to all questions. The option 'not applicable' is also used with logically dependent variables. All questions coded as 'not applicable' are excluded from the final calculation.

As the various MPM implementations have shown, some of the economic data are missing across many of the EU Member States, and in order to better capture this information, the Monitor allows the option of a 'no data' answer. Following the choice of this answer, the country teams are asked to evaluate whether the lack of data represents a transparency problem within their national context, i.e., to evaluate whether the lack of data should be seen as being problematic in their country. In this way the specific characteristics of the national context are also accounted for, since there may be a variety of reasons why certain data are not available/accessible across EU Member States and Candidate Countries, and not all of these reasons may be causes for concern. In order to ensure that all 'no data' answers have contributed to national risk assessments in the same way, a standardised procedure to assign values to the 'no data' answers was developed by the CMPF. According to this procedure, each 'no data' answer was coded and assigned one among the following three possible values: 1) Low Risk: a value of 0.25; 2) High Risk: a value of 0.75; 3) Missing data are interpreted as a 'not applicable' answer and are excluded from the analysis. The number of the 'missing data' values was limited, as much as possible, and was adopted only as a residual category in cases where comments that evaluated the reason behind the lack of data were missing, incomplete, or were impossible to interpret.

The CMPF has developed, then, an "aggregation method" that takes into account the traditions and logic of the Media Pluralism Monitor project. Specifically, the method is based on the mean of the item scores, used as the most common aggregation method in calculating indices, and it was updated to take into account the logic of the MPM, which has traditionally relied on the groupings of legal, socio-political and economic indicators. Consequently, the procedure for establishing the risk assessment of an indicator is as follows:

1) calculate the mean of L-e variables within the sub-indicator

2) calculate the mean of L-i variables within the sub-indicator

3) calculate the mean of 1) and 2). This is the value of the L within the sub-indicator

4) calculate the mean of E variables within the sub-indicator

5) calculate the mean of S variables within the sub-indicator

6) calculate the mean of 3), 4) and 5). This is the result of the sub-indicator.

7) the value of the indicator is the mean of all its sub-indicators.

Finally, the risk assessment of the area is calculated as the mean of all its indicators (five per area). It should be noted that all values were presented as percentages for ease of use and interpretation.

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

procedure for determining the risk assessment of variables, sub-indicators, indicators and areas, detailed above, allowed the MPM to benefit from a standardised formula for all of the levels of the Monitor. This enhanced the comparability of results among the different levels of the Monitor, decreased the arbitrariness in assessing the risk assessments of the various indicators, and, overall, this increased the validity and reliability of the findings. Furthermore, this formula also contributed to establishing a better balance between the evaluation of the legal framework (L variables) with the evaluation of the actual practice, captured by socio-political and economic variables. Finally, the MPM formula also enabled the establishment of risk assessments which are better tailored to the specificities of the national contexts (through the introduction of the 'not applicable' and 'no data' answers). In this way, the differences between the Member States were better captured and reflected in the risk scores (CMPF, 2016 and CMPF2017).

e. Results

In 2016, the MPM was applied simultaneously for the first time to all EU-28 countries, Montenegro and Turkey. It must be noted that the Media Pluralism Monitor produces scores per indicator (per sub-indicator and variable, too) and per area. The Media Pluralism Monitor is not designed to create a ranking of the risks to media pluralism in the states analysed. In order to test the comparability of the results of the MPM with other indices, therefore, we have calculated the simple averages of the scores of the four areas of analysis per country, extracting a single value describing the overall risk for media pluralism at the country level. This is the value, indicated in Figure 2, that we are going to compare with the rankings of other indices.

Figure 2. Average of the scores of the four areas of the MPM2016 per country (EU-28 and Montenegro and Turkey)

MPM2016	% average of the scores of the 4 risks
Austria	44
Belgium	24
Bulgaria	57
Croatia	44
Cyprus	44
Czech Republic	46
Denmark	23
Estonia	42
Finland	41
France	20
Germany	21
Greece	50
Hungary	60
Ireland	41
Italy	46
Latvia	57
Lithuania	44
Luxembourg	52
Malta	47
Montenegro	56
Netherlands	26
Poland	52
Portugal	25
Romania	54
Slovakia	36
Slovenia	55
Spain	43
Sweden	22
Turkey	69
United Kingdom	31

3. Press Freedom Index - Reporters without Borders (RWB)

a. Aim of the Monitoring Tool

The aim and the methodology of the Index of Reporters without Borders are not explained in detail on the RWB website of the project. According to the published information on the project, the aim of the Index is to assess the levels of freedom available to journalists in a given country. The scope of application is very broad as 180 countries are monitored and assessed. For the purpose of this paper, we

extract the data for the EU-28 countries, Montenegro and Turkey. The outcome of the assessment is a numerical value per country and a final ranking.

b. Funding

Reporters without Borders is a French NGO that receives funds from many different sources (governments, private, international organisations).

c. Object of the Monitoring

Based on the information available on the RWB websites, there is no specific reference to a theoretical framework behind the definition of areas and indicators (and therefore the object) of the RWB's monitoring. In this regard, it seems that there are no substantive changes from Schneider's assessment in 2014 (p.20): "*Reporters without Borders does not reveal which concept or definition of media freedom its measure is based on*". The analysis of the questionnaire of the Index suggests that the object of the monitoring is the condition of journalists and the quality of the media environment and market. A particular attention is devoted to monitoring the abuses of journalists, as is clear from the Index's methodology.

d. Methodology

According to the information provided by the RWB website, the monitoring is carried out by combining the responses of experts to the questionnaire produced by RWB. The experts who are asked to reply are media professionals, lawyers and sociologists. Schneider (2014) says that the questionnaire is answered by a number of experts, a number that varies from country to country (between 1 and 50). The experts involved live in the analysed country.

The questionnaire is composed of 87 questions, clustered within "six criteria". The criteria evaluated in the questionnaire are: pluralism, media independence, media environment and self-censorship, legislative framework, transparency, and the quality of the infrastructure that supports the production of news and information (https://rsf.org/en/detailed-methodology).

The questionnaire is composed of questions that, in great part, require an evaluation. Few of them propose a Yes/No option, and no economic data is collected.

"Pluralism" is a criterion that formally overlaps the general topic of the Media Pluralism Monitor. The analysis of the questions by this first criterion shows that the scope of the analysis is limited in comparison with that of the MPM.

The qualitative analysis carried out to assess the responses of the questionnaire is "*combined with quantitative data on abuses and acts of violence against journalists during the period evaluated*" (RWB website). As mentioned above, in this Index, threats and abuses to individual journalists are very relevant and are weighted more than the rest of the indicators in the final calculation of the score per country. According to the methodology reported on its website, Reporters without Borders calculates two scores: the first, called ScoA, is based on six of seven indicators[1] (the seventh indicator on abuses to journalists is excluded). The second, called ScoB, is calculated in a complex manner and combines the first six indicators with the seventh. The final score for a given country is the higher of the two. As mentioned in the RWB's methodology, "*This method prevents an inappropriately low score (high ranking) being given to a country where few or no acts of violence against journalists take place because the provision of news and information is tightly controlled*". Pearson (2015) notes that the aggregation method used

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[1] ScoA, is based on six of seven indicators (the seventh indicator on abuses to journalists excluded). This score is: 1/3scorePlur+1/6 (scoreInd + scoreEA +ScoreCL) +1/12 (scoreTra + scoreInf).

to compile the Index of Reporters without Borders "*strives to add quantitative mathematical rigour to a process that is largely qualitative, with a stronger weighting on acts of violence than upon legislative and systemic anti-media features. The approach incorporates difficult and problematic comparisons of the value of the murder of a journalist vis à vis laws of censorship*". (https://journlaw.com/2015/07/21/how-reliable-are-world-press-freedom-indices/).

No specific timeframe for the data collection is specified. The final score for each country varies from 0 to 100, 0 being the best performance, and 100 the worst.

e. Results

Figure 3. RWB Index scores for EU-28 and Montenegro and Turkey

RWB	score RWB
Austria	13.47
Belgium	12.75
Bulgaria	35.01
Croatia	29.59
Cyprus	19.79
Czech Republic	16.91
Denmark	10.36
Estonia	13.55
Finland	8.92
France	22.24
Germany	14.97
Greece	30.89
Hungary	29.01
Ireland	14.08
Italy	26.26
Latvia	18.62
Lithuania	21.37
Luxembourg	14.72
Malta	24.76
Montenegro	33.65
Netherlands	11.28
Poland	26.47
Portugal	15.77
Romania	24.46
Slovakia	15.51
Slovenia	21.7
Spain	18.69
Sweden	8.27
Turkey	52.98
United Kingdom	22.26

4. Freedom of the Press Index - Freedom House

a. Aim of the Monitoring Tool

The Index developed by Freedom House is the oldest index on freedom of expression. In its 2017 edition, it has a very wide scope, covering 199 countries worldwide. The aim of the Index is to provide an assessment of a so called "enabling environment" (on this concept, see also ECtHR, case Dink v Turkey) in which journalists and the media can operate.

b. Funding

Freedom House is a US-based NGO, bi-partisan, founded in 1941 with the aim of promoting democracy and human rights abroad. This was seen to be in the interest of the US. It receives money from the US government (Schneider).

c. Object of the Monitoring

In order to assess the situation of the environment in which journalists and the media act, the Index carries out a legal, economic and political analysis. Freedom House also considers as relevant indicators those that refer to cultural and local diversity, and it is focussed on news and information. The objects of the analysis covered by the Index span from journalists to news outlets, including online and "*blogs, social media, and text messages—when they serve as de facto news providers*" (FH website).

d. Methodology

The theoretical framework behind the selection of indicators is Article 19 of the Universal Declaration of Human Rights and its binding value, as all UN member states are bound by it under the UN system. The assumption behind it is that regardless of the various national contexts, where there are differences in cultural patterns or economic conditions that may influence the diffusion of news and information, all of the world's countries should comply with universal principles on freedom of expression.

The analysis across the countries is carried out using a questionnaire composed of 23 "methodology questions", divided into three areas of assessment: legal environment, political environment, economic environment. Each answer to the 23 questions receives a score (a lower number of points is attributed for a freer situation, while a higher number of points is allotted for a less free environment. See https://freedomhouse.org/report/freedom-press-2017-methodology).

The 23 "methodology questions" are macro-questions/indicators that are scored through the assessment of additional sub-questions (totalling 124). Each "methodology-question" receives a score that varies from question to question. So, each "indicator" is weighted at more or less. The logic of different weights is not explained in the methodology, as it is described on the FH website.

The assessment is a result of a "*multi-layered process of analysis and evaluation*" carried out by regional experts and scholars (see website) and using "*multiple stages of coding and review*", involving more than 90 analysts. The experts collect data by carrying out field research, contacting professionals, referring to sources like reports from NGOs, local and international, the reports of governments and multilateral bodies, and domestic and international news media. According to the FH methodology, "*the scores are reviewed individually and on a comparative basis in a series of regional meetings involving analysts, a team of senior academic advisers, and Freedom House staff. These reviews are followed by cross-regional assessments in which an effort is made to ensure comparability and consistency in the findings across the world*" (https://freedomhouse.org/report/freedom-press-2017-methodology).

Figure 4. FH: three areas of assessment: topics covered

Legal environment	Political environment	Economic environment
Laws and regulations that potentially influence media content: how they are implemented in practice; constitutional guarantees for freedom of expression; grounds of limitations to freedom of expression; penalties for libel and defamation; the existence of and ability to use freedom of information legislation; the independence of the judiciary and official regulatory bodies; registration requirements for both media outlets and journalists; and the ability of journalists' organizations to operate freely.	Degree of political influence in the content of news media; editorial independence of both state-owned and privately owned media outlets; access to information and sources; official censorship and self-censorship; the vibrancy of the media and the diversity of news available within each country or territory; the ability of both foreign and local reporters to cover the news in person without obstacles or harassment; reprisals against journalists or bloggers by the state or other actors, including arbitrary detention, violent assaults, and other forms of intimidation.	Structure of media ownership; transparency and concentration of ownership; the costs of establishing media, as well as any impediments to news production and distribution; the selective withholding of advertising or subsidies by the state or other actors; the impact of corruption and bribery on content; and the extent to which the economic situation in a country or territory affects the development and sustainability of the media.
Table compiled using the information retrieved on the FH website and re-elaborated (https://freedomhouse.org/report/freedom-press-2017-methodology)		

The data collection covers events between January 1[st.] 2016 and December 31st 2016.

Countries are given a partial score for each area of assessment and a total press freedom score from 0 (best performance) to 100 (worst performance).

The total score of the FH index is calculated as the sum of the scores of the three areas. The area of political environment contributes more than the other two when determining the final score, as it counts for ten points more: Legal environment 0-30 points, Political environment 0-40 points, Economic environment 0-30 points.

With a total score of between 0 and 30, the country qualifies for the status of Free; 31 to 60 Partly Free; and 61 to 100, Not Free.

It needs to be noted that Freedom House produces short reports for each country.

e. Results

Figure 5. FH Index scores for the EU-28 and Montenegro and Turkey

Freedom House 2017

Austria	22.00
Belgium	12.00
Bulgaria	42.00
Croatia	41.00
Cyprus	23.00
Czech Republic	21.00
Denmark	12.00
Estonia	16.00
Finland	12.00
France	26.00
Germany	20.00
Greece	44.00
Hungary	44.00
Ireland	18.00
Italy	31.00
Latvia	26.00
Lithuania	21.00
Luxembourg	14.00
Malta	23.00
Montenegro	44.00
Netherlands	11.00
Poland	34.00
Portugal	17.00
Romania	38.00
Slovakia	26.00
Slovenia	23.00
Spain	28.00
Sweden	11.00
Turkey	76.00
United Kingdom	25.00

A summary comparison of the three methodologies is provided in Figure 6.

Figure 6. Table comparing RWB, FH and MPM methodologies

	Areas	Number of "indicators"	Number of questions	Type of questions	Aggregation method	Narrative reports
MPM	Basic Protection Market Plurality Political Independence Social Inclusiveness	20	200	Legal (e, i), economic, socio-political	Average of the score for different types of questions	Comparative report and narrative per country
RWB	pluralism, media independence, media environment and self-censorship, legislative framework, transparency, quality of the infrastructure that supports the production of news and information Abuses	6	87	Mostly requests for evaluations	ScoA = ScoB	No analysis reports
FH	Legal environment Economic environment Political environment	23 « methodology questions »	124	Legal, economic, political (most require an evaluation)	Sum of the score per macro-question in each environment. Sum of; Legal environment: 0-30 points Political environment 0-40 points Economic environment 0-30 points	Short comparative report. Short country reports

5. Comparison of the scores of the three indices

The MPM is an instrument that analyses possible future risk, consequently, the new index based on the MPM is a "structural" index that predicts risks that may or may not materialize in the future. In this sense, it can be loosely interpreted as being an "ex-ante" index showing a probability that media pluralism will be in jeopardy given the legal, economic and socio-political configuration of a country.

The other indices appear to have a different nature, as they attempt to evaluate the concrete state of freedom of expressions in a country in a given year, in this they can be at least primarily interpreted as "ex-post" indices.

However, this distinction should not be stretched too far. From one side, the MPM evaluates the implementation of laws and evaluates socio-political variables that are unavoidably already "realized" variables, from the other, certain structural and objective elements are included also in the other indices, besides their emphasis on the concrete realization of actual events.

All the three indices have a scoring interval that, in theory, runs from 0 to 100. However, as can be seen in Figure 7, the actual minimum and maximum scores are much closer. Not surprisingly, the MPM index for the EU countries, varying from 20 to 69, has both higher low values and lower high values than the RWB index, running from about 9 to 53, this is probably an effect of the presence in RWB, a global index, of several countries with much worse conditions of freedom of expression, for instance, North Korea, that probably tend to compress the differences between EU countries and/or to comparatively minimize their shortcomings. This effect is less clear when comparing the high range of the MPM index with the FH index, but probably this is only a consequence of the clamorous worsening

of the Turkish situation after the attempted coup in July, 2016, an event not fully reflected by the MPM 2016 data, which were gathered in May, 2016.

Figure 7. Country scores' intervals-min to max (theoretical interval 0-100)

	Min	Max
MPM	20 (France)	69 (Turkey)
RWB	8 (Sweden)	53 (Turkey)
FH	11 (Netherlands)	76 (Turkey)

However, Figure 8, which compares the MPM with an average of the RWB and FH indices, clearly shows how these indices for the EU countries generally present much lower absolute values of risk for pluralism and freedom of expression than the MPM. This appears to be a confirmation of the presence of a sort of global "bias" of the other indices, and it confirms the validity of having a measurement tool specifically conceived for the EU countries.

Figure 8. Comparing MPM scores with the FH and RWB averages
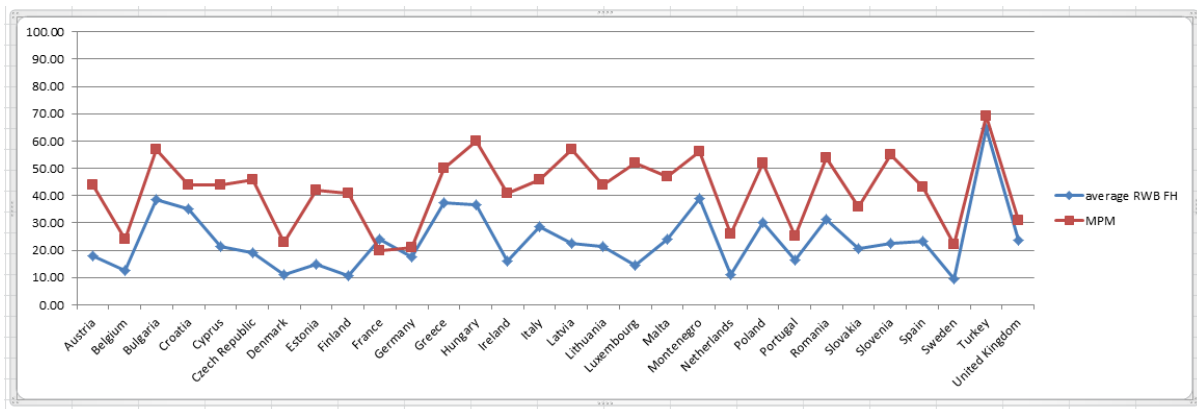
6. Comparison of rankings

The three indices present a different ranking of countries in terms of increasing the risk to media pluralism and freedom of expression. The first surprising result is that the two countries best placed in the MPM ranking, France and Germany, don't fare particularly well in the RWB and FH indices. France is ranked 19th or 18th, Germany does only slightly better, being 10th of 30 countries in both indices. Sweden is the only country to be in one of the first three positions in all of the indices, and a substantial convergence of the indices can also be seen for Denmark and Belgium, which are always ranked among the less problematic countries.

On the high end of the scale, all the indices evaluate Turkey as being the worst country in the rankings, and some substantial agreement can be seen in evaluating as problematic the situation in Hungary, Montenegro, Poland and Bulgaria. A disagreement can be found in the evaluation of the situation of Greece and Croatia, which are very low for RWB and FH, but less critical for the MPM, and the opposite applies to Slovenia and Latvia, which are critical in the MPM, ranking respectively in the 25th and 28th positions, but as less critical in the other indices.

Figure 9. Comparing RWB, FH and MPM rankings (and scores)

	RWB Ranking	RWB Score	FH Ranking	FH Score	MPM Ranking	MPM Score
1	Sweden	8,27	Netherlands	11	France	20
2	Finland	8,92	Sweden	11	Germany	21
3	Denmark	10,36	Belgium	12	Sweden	22
4	Netherlands	11,28	Denmark	12	Denmark	23
5	Belgium	12,75	Finland	12	Belgium	24
6	Austria	13,47	Luxembourg	14	Portugal	25
7	Estonia	13,55	Estonia	16	Netherlands	26
8	Ireland	14,08	Portugal	17	United Kingdom	31
9	Luxembourg	14,72	Ireland	18	Slovakia	36
10	Germany	14,97	Germany	20	Ireland	41
11	Slovakia	15,51	Czech Republic	21	Finland	41
12	Portugal	15,77	Lithuania	21	Estonia	42
13	Czech Republic	16,91	Austria	22	Spain	43
14	Latvia	18,62	Cyprus	23	Cyprus	44
15	Spain	18,69	Malta	23	Croatia	44
16	Cyprus	19,79	Slovenia	23	Lithuania	44
17	Lithuania	21,37	United Kingdom	25	Austria	44
18	Slovenia	21,70	France	26	Italy	46
19	France	22,24	Latvia	26	Czech Republic	46
20	United Kingdom	22,26	Slovakia	26	Malta	47
21	Romania	24,46	Spain	28	Greece	50
22	Malta	24,76	Italy	31	Luxembourg	52
23	Italy	26,26	Poland	34	Poland	52
24	Poland	26,47	Romania	38	Romania	54
25	Hungary	29,01	Croatia	41	Slovenia	55
26	Croatia	29,59	Bulgaria	42	Montenegro	56
27	Greece	30,89	Greece	44	Bulgaria	57
28	Montenegro	33,65	Hungary	44	Latvia	57
29	Bulgaria	35,01	Montenegro	44	Hungary	60
30	Turkey	52,98	Turkey	76	Turkey	69

A detailed comparison of all of the countries is presented in Figure 10. It does not matter that there are differences, since a mild correlation among all indices is clearly present, even if, as already noted, the scores of the MPM are generally much higher than those of the other two.

Figure 10. Comparing MPM, RWB and FH rankings and scores-chart
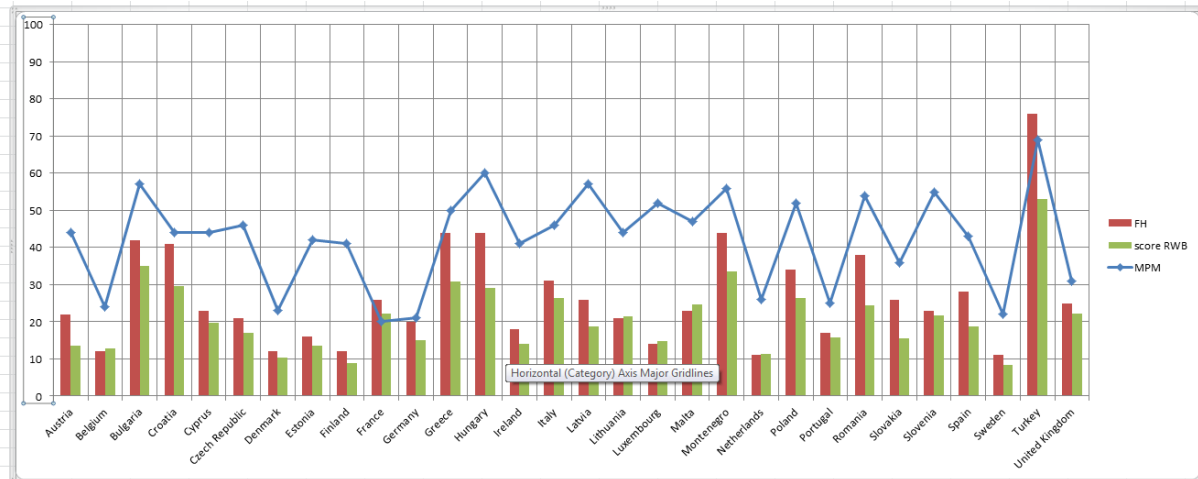
The statistical correlation between country scores and country rankings are shown in Figures 11 and 12. The correlation between the MPM index and the other two is practically the same for both. The coefficient of correlation is 0.69 in the scores between the MPM and both RWB and FH. Consequently, the correlation among the RWB and FH indices is extremely high, 0.96 in the scores and 0.92 in the rankings. This means that the MPM presents significant differences in respect of the other two and, regardless of which is the more accurate, this is a vague question, considering that, in part, they measure different phenomena, and this undoubtedly adds a new and different set of information.

Figure 11. Correlation of scores between the three Indices

MPM/RWB	MPM/FH	FH/RWB
0.69	0.69	0.96

Figure 12. Correlation scores between the three Indices' rankings

MPM/RWB	MPM/FH	FH/RWB
0.67	0.68	0.92

In a first attempt to investigate the possible reasons for the differences in the results, we have explored the correlation between the scores and two "exogenous" factors that are often considered in discussions about media pluralism and freedom of expression, i.e., the country's population and the country's wealth. In regard to the country's population, we didn't have a strong prior idea about its relation to media pluralism, except for some previous studies that, at least in the area of market concentration, observed that a smaller market may have more economic difficulties in sustaining a vast plurality of media, therefore probably suggesting an inverse relation between the market dimension and the risk for pluralism. Figure 13 actually shows a mild negative correlation for the MPM index between the risk to pluralism and a country's population. The correlation is -0.16, a small negative number that is vaguely consistent with the theory that small markets have an inability to maintain more plurality.

What appears to be more surprising is the strong positive correlation between the other two indices and a country's population, both indices show a correlation coefficient of around +0.33. We don't have a clear intuition with which to justify what appears to bee a bias against large countries. A possible and obvious explanation that comes to mind is that indices based on realized events may not be able to accurately weight them, somehow penalizing countries with more negative events in absolute terms. In any case, this bias may explain the strong difference in the ranking for large countries, like France and

Germany, which have much better results in the MPM than in RWB or FH. A simple control of Figure 9 shows that for all the other large EU countries, the United Kingdom, Italy and Spain, a lower risk is also present in the MPM ranking in respect of both RWB and FH.

Figure 13. Correlation of the three indices' scores with country population

MPM	RWB	FH
-0.16	0.33	0.34

A second element that is possibly related to the risk to pluralism in a country has sometimes been identified with a country's wealth. As a possible proxy we have employed the GDP per person. The result of a correlation with the rankings of the three indices is presented in Figure 14.

Figure 14. Correlation of the three indices' scores with the GDP per capita

MPM	RWB	FH
-0.31	-0.52	-0.55

In this case we also did not have a strong prior idea. The MPM index, however, indicates a significant negative correlation between GDP per capita and the score of the countries in terms of a risk to pluralism. It clearly appears that richer countries have lower risks to pluralism. With some optimism, one could also argue for some reverse causation, more media pluralism may contribute to a richer economy. However, even in this case, the two other indices present an even larger negative correlation than the MPM, in the order of more than -0.50, again a type of result that is difficult to explain.

7. Conclusions

The analysis conducted of the methodologies used by Reporters without Borders and Freedom House in compiling the rankings on freedom of expression, shows that both are more similar to each other, and relatively different to the methodology used for the Media Pluralism Monitor.

The very first difference is in the scope of the analysis, as the MPM has been designed to be applied in the EU and in Candidate Countries, and it uses benchmarks and thresholds that are very high, in line with the standards that are expected in the EU, while FH and RWB tools have been created to analyse the situation of freedom of expression and media pluralism worldwide. This element probably affects the adoption of a common theoretical approach to assessment when evaluating the effectiveness of the protection of certain rights. The legal theoretical framework looks very similar, as it is based on international standards for freedom of expression. It is to be noted, in any case, that the legal benchmarks for the MPM are mostly those developed by the EU and the ECtHR within the Council of Europe's framework.

Neither the FH nor the RWB methodologies explain in detail the reasoning behind the questionnaires that they submit to the experts. This may lead to a higher degree of non-objective evaluation in comparison with the MPM, which includes a description of each variable and suggests (when appropriate) common sources from which to collect information on the same variable. This is another consequence of the scope of the monitoring: being limited to the EU and Candidates, the MPM can rely on homogeneous datasets on some specific topics, and it can rely on a common legal framework, not only in terms of general principles, but also in terms of "primary" legislation, when EU directives and regulation are taken into account, and in terms of case-law, as the European Court of Human Rights' jurisprudence is considered a benchmark.

Another difference that is noticeable at first glance is the difference in the number and types of questions that the MPM questionnaire poses in comparison with the other two measurements. Freedom House's methodology is more comparable to the MPM one than the methodology used by Reporters without Borders, in relation to the logic behind the questionnaire, the questions' types and the objects of analysis.

A very relevant difference between the MPM's and the two other Indices' methodologies is the weighting of the variables and the indicators. While, in the MPM methodology, the weighting is implicit in the aggregation method per variable and in the sub-indicators, each indicator contributes equally to determining the average per area, so, in the end, the score per area. In the cases of the other two indices, some areas are weighted more than others.

In terms of statistical results, however, the MPM appears to produce clearly distinguishable information from both of the other indices, thus definitely providing an autonomous new source that can be usefully exploited for academic research and policy evaluation. Once related to the common exogenous factors, like the country's population or the GDP per capita, the MPM results appear to be easier to understand, and they are probably less biased than the others. Nonetheless, our results are still very preliminary and further research to explain the differences among the three indices and their informational value needs to be undertaken.

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