

# MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

## APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, THE REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2020

Country report: Slovenia

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**Research Project Report**

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# 1. About the project

## 1.1. Overview of the Project

*The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States of the European Union and in candidate countries. This narrative report has been produced on the basis of the implementation of the MPM carried out in 2020. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.*

## 1.2. Methodological note

### Authorship and review

*The CMPF partners with experienced, independent national researchers to carry out the data collection and author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire developed by the CMPF.*

*In Slovenia the CMPF partnered with Marko Milosavljevic (University of Ljubljana), Romana Biljak Gerjevic (Faculty of Social Sciences), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the 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 II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.*

*Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).*

<b>Fundamental Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

## The digital dimension

*The Monitor does not consider the digital dimension to be an isolated area but rather as intertwined with traditional media and existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digital-specific risk scores and the report contains a specific analysis of risks related to the digital news environment.*

## The calculation of risk

*The results for each thematic area and indicator are presented on a scale from 0 to 100%.*

*Scores between 0 and 33%: low risk*

*Scores between 34 to 66%: medium risk*

*Scores between 67 and 100%: high risk*

With regard to indicators, scores of 0 are rated 3% while scores of 100 are rated 97% by default, to avoid an assessment of total absence or certainty of risk.

**Disclaimer:** The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2021 scores may not be fully comparable with previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2021, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

## 2. Introduction

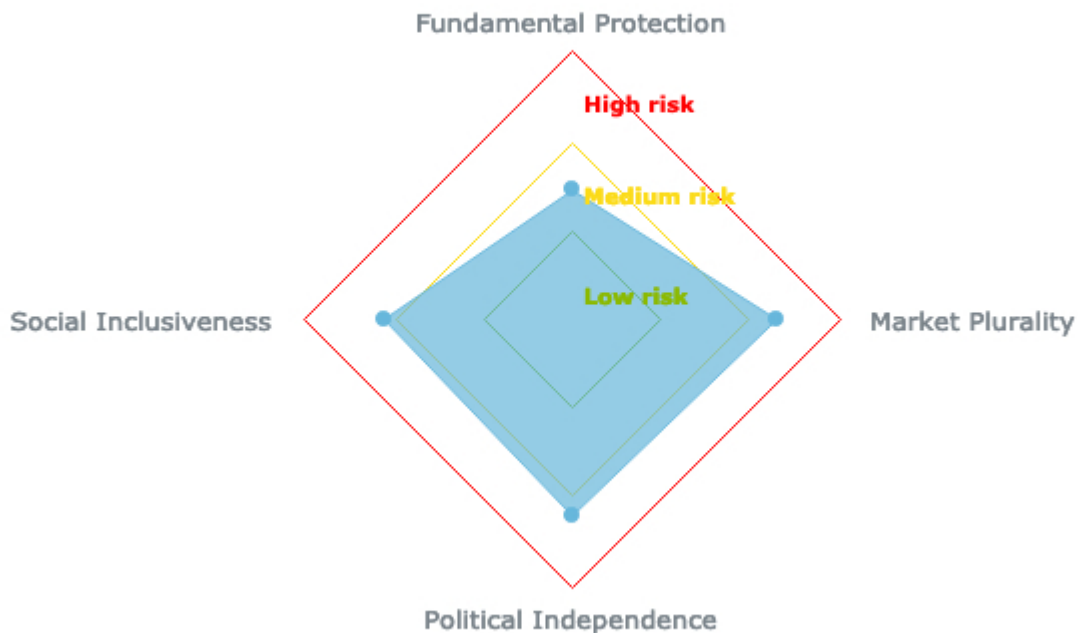
- **Population:** The Republic of Slovenia has a population of 2.111.461 (SURS 2020) spread over 20.271 km<sup>2</sup>.
- **Languages and minorities:** The official language is Slovenian. There are three officially recognised minority groups: Hungarian (0,3%), Italian (0,1%) and Roma group (0,1%) and other officially non-recognised minorities from the former Yugoslavia, such as Serbs (2%), Bosnians (1,6%) and Croats (1,8%) (EACEA 2021). They do not enjoy minority rights even though their share of the population is larger than the share of officially recognised minority groups. In areas where the Italian and Hungarian national minorities are densely populated, Italian and Hungarian are also official languages.
- **Economic situation:** Before COVID-19, Slovenia's economy was experiencing a "long period of high growth that had supported higher living standards, improved labour market inclusiveness, and fostered faster income convergence" (OECD 2020). The health emergency, however, hit the economy hard, "containment measures cut many service activities, while manufacturing was hit by falling foreign demand" (OECD 2020). In 2020, Slovene GDP decreased by 5.5% (Korenič 2021).
- **Political situation:** Slovenia is a democratic republic; the highest legislative body is the National Assembly. Since gaining independence from Yugoslavia in 1991, Slovenian politics have been represented by a clear left-right divide, which was shaken in recent years by the success of centre-liberal parties often following the "new face" trend, which is a frequent term used by Slovenian media to describe new politicians (Rak, Bulatović, Zupanič 2018). The contemporary political landscape in Slovenia is characterized by a high number of small parties, prevalence of coalition politics and instability.
- **Media market:** In accordance with the size of the country, the media market is small and shaped by high media ownership concentration. It is highest in the radio sector, which is followed by the magazine sector and audiovisual. The circulation of the country's daily newspapers is falling yearly. The media legislation remains unadapted to the global digital players. Journalism in the country is also influenced by extensive smear campaigns (for instance journalists being called vulgar names) exercised by visible political figures, many of them linked or part of a new right-wing government that came into power in March 2020 (RSF 2020b, Higgins 2021).
- **Regulatory environment:** A new government led by the right-winged Slovenian Democratic Party (SDS) was established in March 2020, when the party formed a coalition with the Modern Centre Party (SMC), the Democratic Party of Slovenian Pensioners (DeSUS) and New Slovenia—Christian Democrats (NSi). Janez Janša became the Prime Minister for the third time. Several members of the SDS party are co-owners of a network Nova24TV, print and online political magazines (Demokracija, Škandal24) and have been affiliated with a number of microlocal websites (Vezjak 2020). Their media outlets are also tied to investors, which were connected with several Hungarian pro-government media and tied to the Hungarian government (Kučić 2019). Hungarian owners with links to the Hungarian government of Viktor Orbán purchased one of the main commercial TV stations, Planet TV, established and owned by state-controlled Telekom. These foreign investments are not problematic as such, but they are frequently described by many media outlets as geopolitical investments made to enhance the strength and popularity of Janša and the SDS party (Kingsley 2018, Bayer 2021, Ozsvath 2021). The government introduced a set of proposals of four media laws (Mass Media Act, Public Broadcasting

Act, Act on Slovenian Press Agency, Audio-visual Media Services Act) with an initial public debate of only five days, later extended after an outcry from the public and stakeholders. None of the laws was accepted in 2020.

- **COVID-19:** With regards to the COVID-19 health crisis, Slovenia proclaimed a national epidemic twice (from March until May and from October onwards). Slovenia was named among the EU members that most disproportionately restricted freedoms in the COVID-19 pandemic by Greenpeace and Civil Liberties Union for Europe, highlighting the government silencing critics, denying journalists access to accurate and relevant information and proposed changes to media legislation (Civil Liberties Union for Europe, Greenpeace European Unit 2020). Slovenia's rating was also downgraded by CIVICUS, which was concerned about the suppression of media freedom, threats to journalists, attacks on civil society organisations dealing with culture, human rights, media freedom, the environment and the reduction of funding for non-governmental organisations (Malovrh 2020).

### 3. Results from the data collection: assessment of the risks to media pluralism

#### Slovenia: Media Pluralism Risk Areas



JS chart by amCharts

- In general, findings of the MPM2021 implementation indicate an overall high risk to media pluralism in Slovenia. Compared to the findings of the MPM2020 implementation, all monitored areas show a slight deterioration.
- **Fundamental Protection** is the only area to score medium risk to media pluralism (with 48%), while all other monitored areas scored high risk: **Market Plurality** with 76%, **Political Independence** with 73% and **Social Inclusiveness** with 70% risk to media pluralism.
- Within the monitored areas, the highest risks to media pluralism are indicated on Protection against illegal and harmful speech (94%), which was monitored specifically online, followed by Independence of public service media (PSM) governance and funding (92%), Political independence of media and Access to media for women (both 90%), Online platforms concentration and competition enforcement and Commercial & owner influence over editorial content (both 88%), News media concentration (85%) and State regulation of resources and support to media sector (75%).
- None of the indicators monitored in 2020 scored low risk to media pluralism.
- The convergent regulator Agencija za komunikacijska omrežja in storitve (Agency for Communication Networks and Services, AKOS) with powers in telecommunications, electronic media, postal and railway services, is responsible for the regulation of audiovisual media, radio services and online media. Experts however notice that media topics are often marginalised due to the scope of their operations, while the European Commission noted "its effectiveness is constrained by the lack of human resources" (European Commission 2020).
- The media legislation requires media to disclose information of 5% or higher individual ownership or

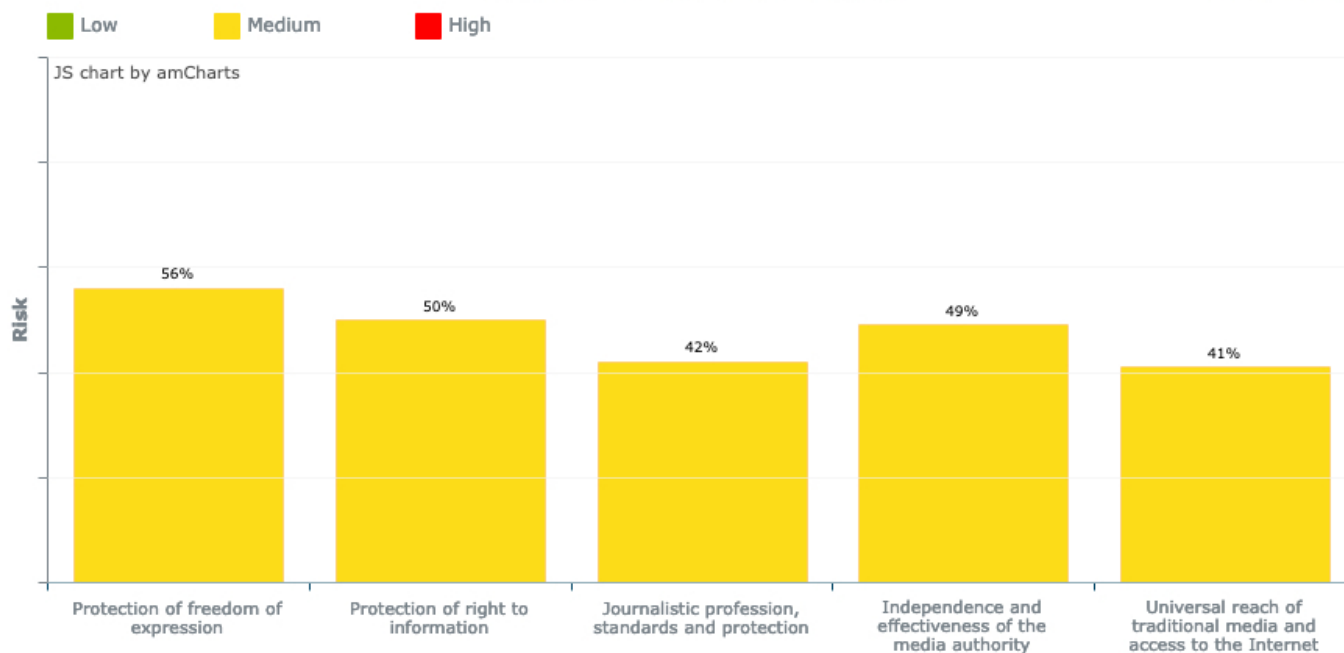


management stakes in the publishing or broadcasting company to the Ministry of Culture. The information is published in the Media Register, which is public; however, ultimate owners are not always evident from it. The legislation also prohibits combining radio, television and print medium activities. However, the limitations can be avoided by either formally / legally splitting the owner from the publisher or connecting a group of different publishers in a complex ownership network and consequently hiding a concentration on the market (Transparency International Slovenia 2016).

- Journalists are connected into three national associations: Društvo novinarjev Slovenije (Slovene Association of Journalists), Sindikat novinarjev Slovenije (Slovenian Union of Journalists) and Združenje novinarjev in publicistov (Association of Journalists and Commentators), which act as their important voice. However, the government and media directors often ignore their requests. They follow a Kodeks novinarjev Slovenije (Code of Journalism Ethics), and the public can also complain to the Novinarsko častno razsodišče (Ethics Commission of Journalists), which then passes judgments on the compliance or violation of the code. However, the ethics commission can not implement any significant sanctions.
- The state did not introduce any specific measures for journalists or media outlets in regards to the COVID-19 crisis (STA, M.R. 2020). In addition, many newsstands were closed due to the crisis, and the availability of print media was prohibited in cafes and restaurants, officially for health reasons, further increasing distribution issues and decreasing readership of print media (RSF 2021). There was also a period of time when it was unsure if the Ministry of Culture would pay the funds from the yearly tender for co-financing media content (agreed on in 2019) in full (STA 2020d). Slovenska tiskovna agencija (The Slovenian Press Agency, STA), owned by the state, was hit particularly hard as it suffered a complete suspension of legally-requested and defined funding from the state (EFJ 2020). In addition, the proposed media laws (mentioned in the introduction) would result in reduced funding for Radiotelevizija Slovenia (Radio-Television of Slovenia, RTV Slovenia) as well (Public Media Alliance 2021).

### **3.1. Fundamental Protection (48% - medium risk)**

*The Fundamental 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.*



The indicator on **Protection of freedom of expression** scored the highest medium risk within this area with 56 %. Defamation is still criminalized within the Criminal Code with prison time or a fine. The right to correction in the Mass Media Act is problematic and often abused, also acknowledged by the 2020 World Press Freedom Index (RSF 2020). The government imposed some restrictions on media concerning the reporting on the COVID-19 pandemic. Classic press conferences were originally replaced with an appearance in front of the cameras without the presence of journalists - questions from other media were read by PSM journalists, which limited follow-up questions. Later on, physical presence and video calls were established (Vorkapić 2020). During the first and second COVID-19 epidemic, the government closed newsstands. After opening cafes and hairdressing salons, access to the press in these premises was still banned. Especially magazine print was consequently left without a significant number of subscribers. This was seen as an attempt to economically harm the print media, which are critical of the government (Petkovič 2020). The laws do not provide specific legal remedies for those whose freedom of expression has been violated. However, they provide all the regular remedies, such as court access to citizens or journalists/media, a potential appeal to the European Court of Human Rights or the Ombudsman. The European Commission pointed out the long proceedings of the Constitutional Court, stating its backlog and length continued to rise in 2019 and was further occupied by reviewing measures adopted in response to COVID-19 (European Commission 2020). In 2019, prosecution of journalists and the newspaper Dnevnik began for publishing wiretaps of a political scandal. The Supreme Court, later on, ruled that the publication was in the public interest, which was an important judicial decision (Lovšin 2020). There were 39 lawsuits brought upon three journalists of portal Necenzurirano.si and lawsuits against POP TV and its journalists, both as a form of strategic lawsuits against public participation (SLAPP) attempts and stand as cases of indirect pressure on freedom of expression in the form of financial and administrative exhaustion (M.R. 2020, Kunaver 2020). There are regular cases of public personas (especially politicians) expressing negative and hate comments about journalists and media outlets (Grešovnik 2020). For instance, PM Janez Janša frequently describes journalists, namely female ones (Železnik 2021), and specific media outlets as “presstitutes”. Public communication by members of the government and the ruling party has been described as hostile and aggressive by a number of media outlets (Bratanič, Winfrey 2021, Vladislavjevič 2021, Wiseman 2020). The Slovene Interior Minister Aleš Hojs called for journalists and media professionals, who reported from the scene of anti-government protests, to face criminal prosecution

(Mapping Media Freedom 2020). In October, editors-in-chief of 22 media outlets addressed an open letter to the Prime Minister stating: “Rarely anywhere in the EU, as in Slovenia, are journalists exposed to direct deception, incitement, the spread of manipulation and insults by government officials, starting with the top of the government” (Al. Ma 2020). There was an example of a whistleblower who shared information about government corruption with buying protection masks. He was widely insulted on social media by visible government members. There was also an incident when the Trade Union of Soldiers of Slovenia called on members to authorize them to file a lawsuit against a visible public persona for allegedly insulting and slandering Slovenian soldiers and the PSM for transmitting the statements (R.A. 2020).

The indicator on **Protection of right to information** was downgraded from low risk in the MPM2020 assessment to medium risk with 50%. The right to information is explicitly recognised in the Constitution, and there are appeal mechanisms in place. Restrictions to the right to information are defined. However, they are often misused, especially the use of the confidential label. There were media reports about the process of obtaining public information often being prolonged, with public administrations waiting the maximum amount of time until denying the access, which forces the applicant to appeal to the Information Commissioner, who has a lot of requests due for re-decision (Pihlar 2020). In May, the Senate of the Supreme Court decided that all court files were no longer in the public information system (STA, Gr.G 2020). In November, the Supreme Court announced that their May ruling does not restrict access to court rulings and that the understanding of the decision in the sense that it is closing the judiciary to the public was the result of misinterpretations. The Judicial Council also noted that the judgment did not interfere with the courts' obligations regarding access (STA 2020). There is a legal framework protecting whistleblowers<sup>11</sup>; however, experts note improvements are needed for it to be adequately enforced. The legal order also does not provide for an effective mechanism for sanctioning members of parliament, state councillors, municipal councillors and mayors, in case of illegal or non-integrity conduct (KPK 2020).

The indicator on **Journalistic profession, standards and protection** scored the same medium risk as a year ago with 42%. Journalistic associations act as an important voice of journalists within specific media and on the national level; however, their requests are often ignored. Since the economic crisis but also due to other circumstances (owners with semi-legal or illegal practices, intentions for higher earnings), job security has fallen significantly and has led to much worse working conditions for the majority of journalists. A survey of 232 journalists within the Slovenian media environment, provided by the Slovene Association of Journalists in 2020, showed the biggest problems for journalists are overwork (48%) and low salaries (40%), followed by the incompetence of editors and the lack of ongoing education (30%) (Slovene Association of Journalists 2020). There have been salary cuts and lay-offs at a number of outlets connected to the fall of advertising, which was a consequence of the health emergency. The state did not introduce any specific protection or measures to safeguard the journalistic profession and functioning of media (STA, M.R. 2020). There was also a period of time when it was unsure if the Ministry of Culture will pay the funds from the annual tender for co-financing media content (agreed on in 2019) in full (Slovene Association of Journalists 2020b). Later the funds were fully disbursed. In November, a photojournalist was hospitalised after being beaten by unknown perpetrators while covering violent clashes with riot police in the centre of Ljubljana, other reporters were also assaulted the same night (IPI 2020). No journalists were killed in Slovenia (Committee to Protect Journalists 2020). There is no anti-SLAPP legal framework in place and there were cases of intimidatory lawsuits against journalists and media outlets (Council of Europe 2020, Kunaver 2020).

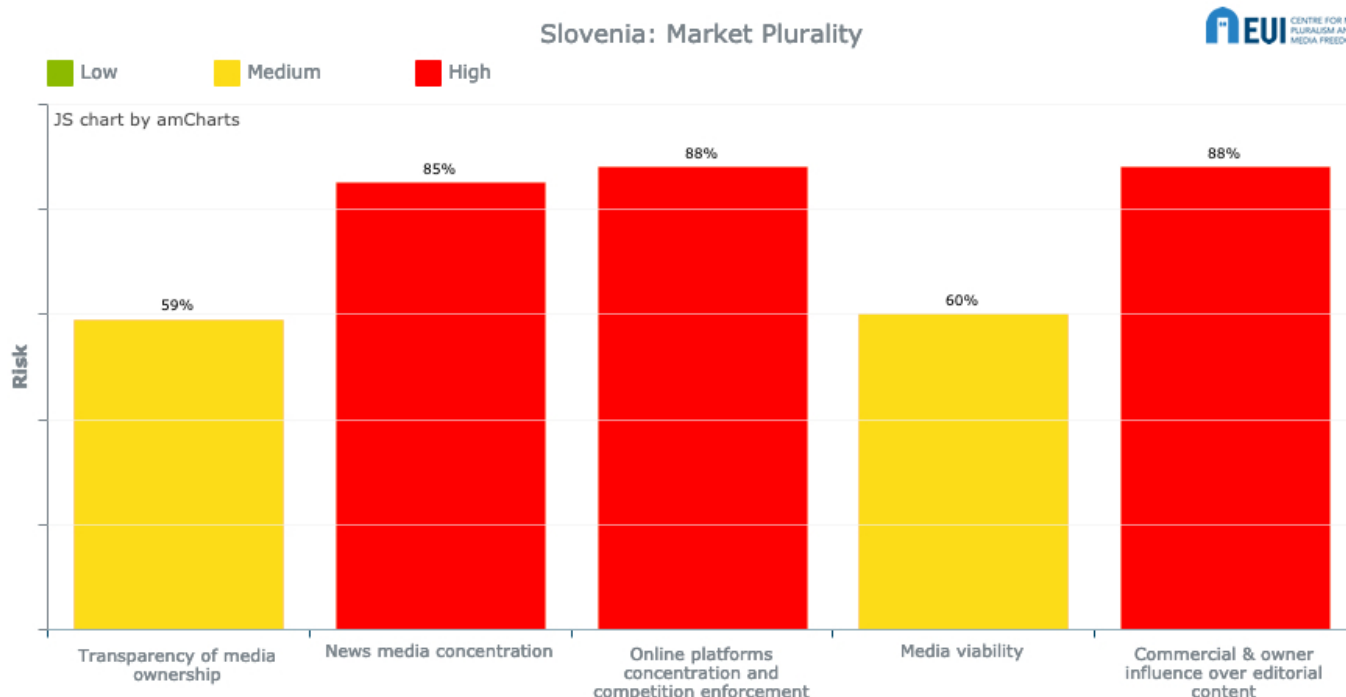
The indicator on **Independence and effectiveness of the media authority** scored medium risk with 49%. The appointment procedures are respected, but very loose, consequently they cannot safeguard political

and economic independence completely. The tasks and responsibilities of the media authority are defined by the law, the authority can issue warnings, suspend or revoke licences. However, due to the extensive scope of AKOS' duties, experts notice media topics are often marginalised. This could have worsened in the future, as the government has drafted a bill in 2020 to bring together eight key regulators, including AKOS (STA, M.R. 2020). However in April 2021, the National Parliament voted against the adoption of this bill and thus regulatory bodies remain un-merged (STA 2021). The European Commission noted AKOS' "effectiveness is constrained by the lack of human resources" (European Commission 2020). There was an affair with 5G licenses, which were given to companies connected to visible political figures affiliated with the Agency, however the Ministry of Public Administration did not find any irregularities in the extraordinary supervision of the Agency's work (Kořak 2020).

The indicator on **Universal reach of traditional media and access to the internet** scored medium risk with 41%. Universal coverage of the PSM is guaranteed, however there is a lack of data on the exact percentage of population covered.

### 3.2. Market Plurality (76% - high risk)

The Market Plurality area focuses on the economic risks to media pluralism, deriving from lack of transparency and concentration of ownership, sustainability of the media industry, exposure of journalism to commercial interests. The first indicator examines the existence and effectiveness of provisions on transparency of media ownership. Lack of competition and external pluralism is assessed separately for the news media (production of the news) and for the online platforms (gateways to the news), considering separately horizontal and cross-media concentration; the concentration of online advertising market; and the role of competition enforcement. The indicator on media viability measures the trend of revenues and employment, in relation with GDP trends. The last indicator aims to assess risks to market plurality posed by business interests on production of editorial content, both from commercial and owners influence



The indicator on **Transparency of media ownership** scored a medium risk with 59%. The Mass Media Act requires media to disclose information of 5% or higher individual ownership or management stakes in the publishing or broadcasting company to the Ministry of Culture<sup>[2]</sup>. The information is published in the

Media Register, which is public (Ministry of Culture 2020). The law does not contain any provision, which would require the disclosure of ownership details to the public by the media itself. Slovenia does have an online Register of ultimate owners, where the beneficial owners of media can be found (Open Ownership 2020), however they are not always evident just from the Media Register. The current legislation makes it possible for different publishers to connect in a complex ownership network and hide their concentration on the market (European Commission 2020).

The indicator on **News media concentration** scored a high risk with 85%. The media market is small and horizontal concentration is generally high. It is highest in the radio sector (which is dominated by one actor operating through unclear ownership structures), followed by the magazine sector (dominated by the same publisher as in radio sector, increasing cross-media concentration even further) and audiovisual sector. To prevent cross-media concentration, the Mass Media Act establishes a threshold of an ownership stake of more than 20 percent, when a publisher of a daily informative printed medium needs the approval of the Ministry of Culture to also publish or co-found a broadcaster of a radio or television programme service and vice-versa. Combining radio and television activities, advertising and radio and television activities or telecommunications and radio and television activities is not permitted. The limitations are however not always implemented, for instance, the Media24 Group combines print, radio and television, publishes more than sixty different media, doing so with a group of different publishers connected in a complex ownership network (Kučić 2020). There is a lack of data on the market share of specific media outlets, as there is no regular annual analysis of the media market with exact data.

The indicator on **Online platforms concentration and competition enforcement** scored a high risk to media pluralism with 88%. Sufficient information to identify the beneficial and ultimate owners of digital native news media outlets is not always publicly accessible. The legislative articles regarding horizontal and cross-media concentration in the media sector do not specifically regulate the digital environment in the way they regulate the radio, printed and television environment. There are no signs that concentration in the digital environment is being monitored at all. In 2019, the Slovenian Ministry of Finance announced a government proposal to submit a draft bill to the National Assembly introducing a digital services tax. In September 2020, the opposition party Left submitted a bill on the digital services tax (which would include large digital companies, such as Apple, Facebook, Amazon, Google) to the parliamentary procedure, however the proposal was denied. The new Audiovisual Media Services Act, proposed in 2020 and to be adopted in 2021, includes the extension of certain rules for audiovisual media services to video-sharing platforms, it covers both services such as YouTube and audiovisual content shared via social media.

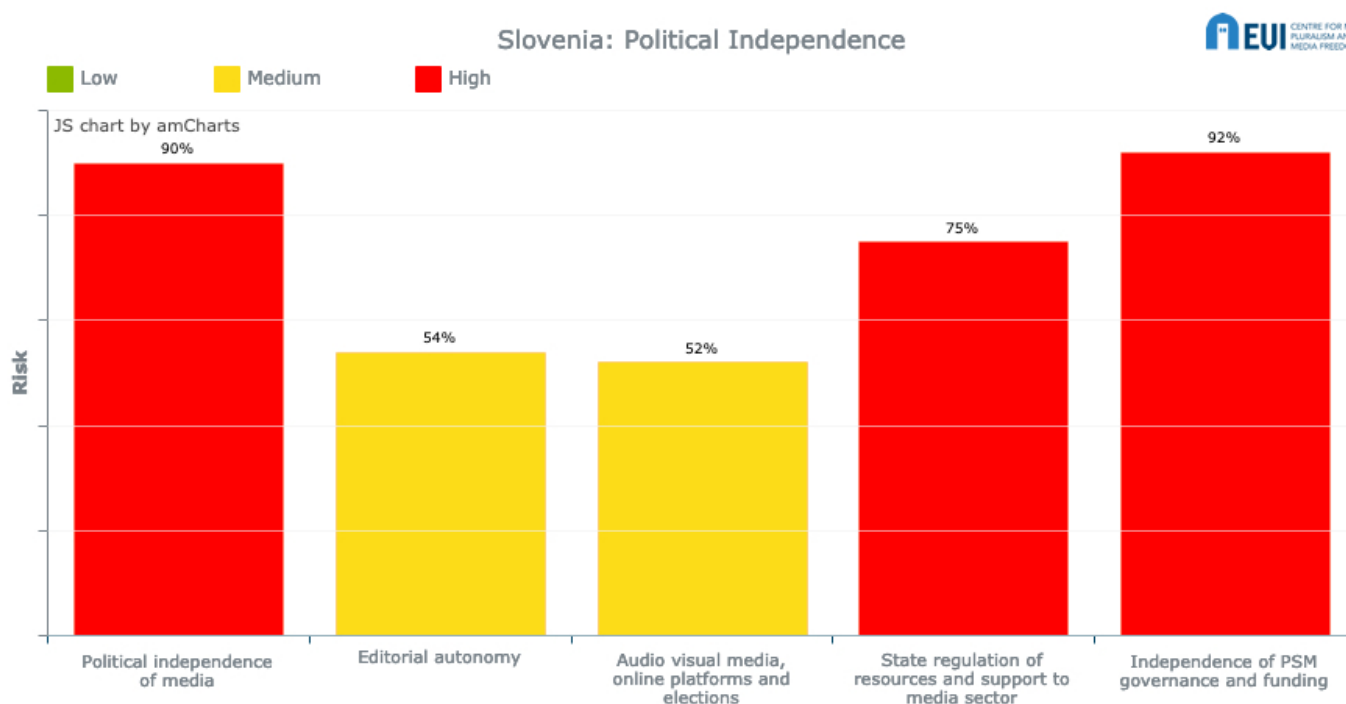
The indicator on **Media viability** scored medium risk with 60%. While there is no exact data on all revenues of media outlets, media managers and other stakeholders have pointed out to decreased revenues in all sectors of media, due to decreased revenues from advertising, weaker sales of print (limited distribution, closed newsstands) and a lack of specific support measures for media during the COVID-19 crisis (DK, STA 2020). The number of employed journalists has been decreasing, young journalists often work as freelancers or contract workers, even though they might have all the elements needed for a regular employment. Several media outlets (specifically newspapers) introduced savings measures and laid-off employees (Slovene Association of Journalists 2020c).

The indicator on **Commercial & owner influence over editorial content** scored the highest risk within this area with 88%. There are no specific mechanisms granting social protection to journalists in case of changes of ownership or editorial line. The Union of Slovenian Journalists offers free legal help, however membership is not obligatory. There are no regulatory or self-regulatory safeguards, which seek to ensure

that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests. The Mass Media Act and The Code of Journalism Ethics<sup>[3]</sup> include some measures to prevent commercial influence on journalists and content, however they are not always effective. Advertorials appear often (mostly) in print and online media and there are examples of business owners influencing editorial content, namely at newspaper Delo (Kučić 2020b). There was a case of a state company Holding Slovenske elektrarne (HSE) deciding not to sign a sponsorship agreement with newspaper Dnevnik after the outlet published an article about the director's visit to the head office of the SDS party (Hreščak 2020).

### 3.3. Political Independence (73% - high risk)

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



The indicator on **Political independence of media** scored high risk (90%). The Mass Media Act (2006) or other laws do not regulate the conflict of interests between owners of media and the ruling parties, partisan groups or politicians. The general Integrity and Prevention of Corruption Act (Integrity and Prevention of Corruption Act, 2010) applies, however it does not mention media in specific terms. The conflict of interest is very present, it scored high risk in the audiovisual media, newspapers and online, while it scored medium risk in the radio sector. The conflict is significantly present in the local areas, where a lot of small newspapers and publications are connected with major political parties and mayors (Čakš 2020). Members of the SDS party are co-owners of a TV network and a news website Nova24TV, as well as print and online political magazines (Demokracija, Škandal24) and the media have affiliated them with a number of micro local websites (Vezjak 2020). They are also tied to investors, which were connected with several Hungarian pro-government media and with ties to Hungarian government (Kučić 2019). In September 2020, previous domestic political editor at the Slovenian Press Agency (Act on the Slovenian Press Agency, 2011) and

editor at Planet TV, who was also part of establishing the SDS led Nova24TV portal and television, Uroš Urbanija became the new director of the Government Communications Office (UKOM) (Roglič 2020). Interior Minister Hojs is also a former director of Nova24TV (Vežjak 2020). In October, the national telecommunications provider Telekom Slovenije sold Planet TV to Hungarian media company TV2 Media. The latter is owned by Jozsef Vida, whom media associate with the business network of the Hungarian ruling party Fidesz (STA 2020b). After PRO PLUS was sold to Czech financial fund PPF (owned by Petr Kellner) in October, the media reported of a secret meeting between the new owner and Janša in December (Cirman, Vuković 2020). The independence of the Slovenian Press Agency (STA) scored a significant high risk. Many experts noted that the proposed Act on Slovenian Press Agency (which was part of the set of media laws mentioned in the introduction) threatened to “establish direct government control and power over the appointment of key personnel” (Department of Journalism, Faculty of Social Sciences 2020). In November 2020, UKOM announced it will suspend the agency's financing. UKOM requested a series of data from STA, including an explanation and data on a number of articles and editorial decisions. This request (or demand) was rejected by the manager of STA, as this information can only be requested by the government, which is the sole shareholder (EFJ 2020, Simič 2021). The government's law enforcement service also established that the suspension of STA's funding was illegal (Hreščak 2020b). The dispute was unresolved in 2020.

The indicator on **Editorial autonomy** scored medium risk (54%). While the media laws mention autonomy when appointing and dismissing editors-in-chief, they often have no real effect as owners appoint a 'temporary' editor-in-chief and the journalists in many cases have no power to prevent someone inappropriate from being appointed. The role of freelancers and permanent contributors is also not defined in this regard. The general Code of Journalism Ethics (2002) applies to all journalists and media and it prescribes a Journalist Honour Court, which can answer complaints from the public about journalists not following the Code. Neither of them is, however, obligatory and has no real sanctioning powers. There are numerous cases where political influence and interference on editorial decisions and content were reported, especially in media under direct political influence, through ownership (either commercial or state) and owners' interests. In addition, an educational show on Populism at the public broadcaster RTV Slovenija was removed from the online archive and edited after political interference (Bulatović 2020).

The indicator on **Audio visual media, online platforms and elections** scored medium risk (52%). The representation of political actors and political viewpoints on the PSM follows a "fair and balanced" approach, which is often noted as very mathematical and can lead to relativism of issues (Faculty of Social Sciences 2020). While the PSM must guarantee access for election candidates, parties and programme presentations (equal time for candidates and political parties represented in the National Assembly and European Parliament and one-third of the total time determined by the PSM for candidates and political parties that are not represented in the National Assembly or European Parliament), there are no laws or self-regulation which would guarantee access to airtime on commercial channels for political actors during election campaigns. At times the presentation of different groups of political actors can be fairer on commercial channels compared to the public service channels, as they are not limited by specific rules as the PSM. On the other hand, the representation on commercial channels is also less fair, as they can adjust the timing to the candidates and parties that are perceived as more attractive for the viewers and ratings, or for political views of the broadcasters' editors or management. The conditions and prices for political advertising on the PSM are set, the rates on commercial channels differ from one to another, but are equal for different political parties. In practice, the stronger political actors can obtain more space than the new, smaller ones, both on PSM and commercial channels, as they have a more stable financial background.

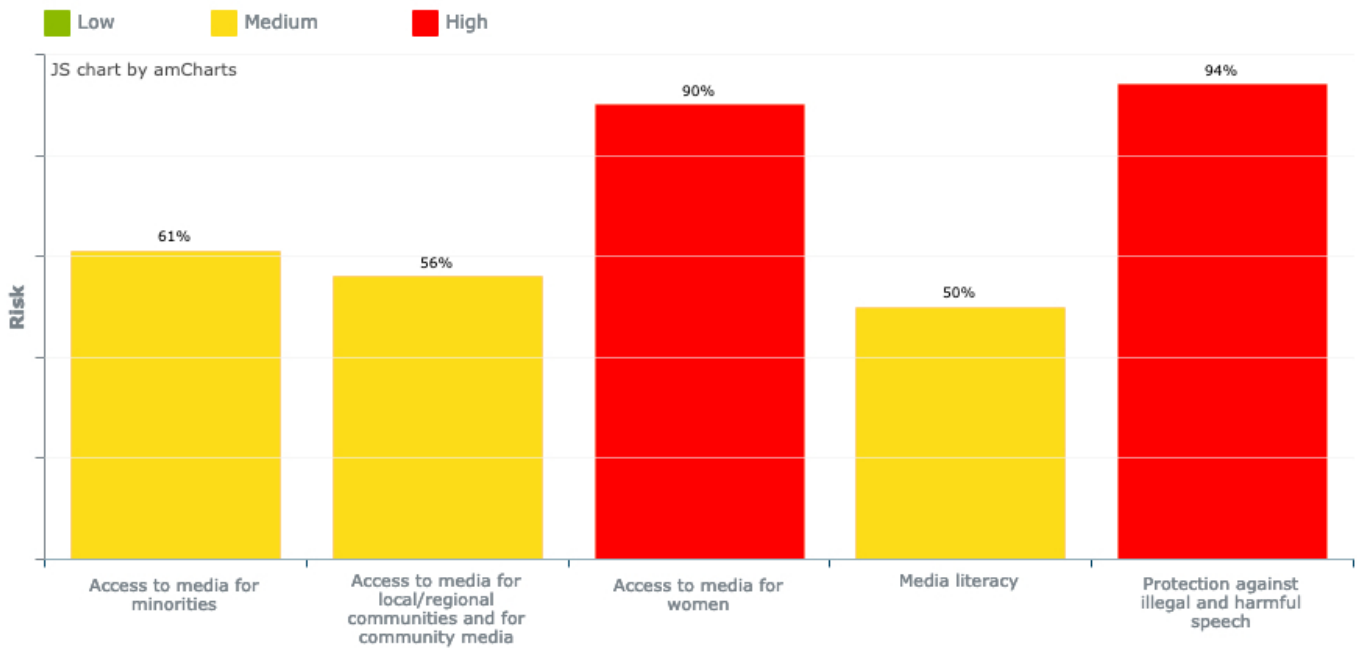
The indicator on **State regulation of resources and support to media sector** scored a high risk (7) mentioned, there were no specific subsidies for media or journalists related to COVID-19. The main issues are noted within the distribution of state advertising to media outlets and advertising paid by national, regional or local governments, as it is distributed without a clear set of rules. For instance, there was an issue with advertisements for the Slovenian Army by the Ministry of Defense, which started appearing on the SDS-owned Nova24TV, even though it was not in the ministry's media plan. At the same time, media reported that advertising did not appear in some of the media outlets, which were included in the plan (Savič 2020). There is a general lack of data on media, which received advertising from state companies. In 2020, the government published recommendations for the implementation of advertising campaigns by ministries and government services, which suggested redistributing funds among the media evenly, regardless of their performance on the media market (Vertačnik 2020).

The indicator on **Independence of PSM governance and funding** was downgraded from medium risk in MPM2020 to the highest risk within this area with 92%. This is mostly due to (attempted) changes in management and board functions, as well as the draft law of the new Radio and Television Corporation of Slovenia Act, proposed in July 2020. While the (existing) Act (Zakon o Radioteleviziji Slovenija, ZRTVS-1, 2005) provides relatively fair and transparent legal provisions considering appointment procedures for management and board functions of the PSM, they leave a gap for political influence, as a majority of the Programming Council or Supervisory Board members are appointed by the National Assembly, political parties, and the government. In spring, the government dismissed three supervisors and appointed new ones (Škerl Kramberger 2020). This was followed by a court dispute, which dismissed two of the three new members of the Supervisory Board (STA 2020c). There was an attempt to dismiss the General Director Igor Kadunc in November (Škerl Kramberger, STA 2020). The amount needed for the financing of the PSM is in place with the legislation, however the PSM officials calculated the proposed changes of the Public Broadcasting Act, which were introduced within the set of media laws (mentioned in the introduction), would deprive the public service of approximately 13 million euros (Lesjak Tušek, Petkovič 2020).

### **3.4. Social Inclusiveness (70% - high risk)**

*The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. In addition, for the 2021 edition of the MPM, a new indicator has been added to the Social Inclusiveness area in order to assess new challenges raising from the uses of digital technologies: Protection against illegal and harmful speech. Due to this modification of the indicators, comparison with previous editions of the MPM should be handled with extreme care.*





The indicator on **Access to media for minorities** scored medium risk with 61%. While the law guarantees access to airtime on PSM to legally recognized minorities (Italian, Hungarian and the Roma community) <sup>[4]</sup>, experts note that the disproportion between the amount intended for the Italian and the amount intended for the Hungarian national communities can be problematic, as the constitutional position of both communities is equal. There is a lack of employment of the Roma community on the PSM channels. The amount of content for the Roma community on commercial channels is insufficient and experts believe a permanent financial scheme (via donations, subsidies) for regular Roma content in local media is needed, with the condition that the Roma community participates in the creation of this content. Commercial non-profit mediums for the Roma community can apply to tenders of the Office for Nationalities and the tender of the Ministry of Culture for media content, where they compete with established national media. Their situation is thus far worse than that of the Italian and Hungarian communities, which have access to their local government funds. Even though the Slovenian legislation complies with all international treaties, minority rights only apply to a small segment of the minority populations. The presence of legally unrecognized minorities (Serbs, Bosnians and Croats) on the PSM is believed as better than their representation in other segments of the Slovenian society. The PSM finances these shows from the PSM contribution and not from sources that finance Italian, Hungarian and Roma content, however the amount of content is not proportionate to the size of these communities and the number of topics that arise in connection with them. Minorities, which are not recognised by the law, have no regular access to airtime on commercial TV and radio channels, it is mostly fragmented and inconsistent. The content for (and by) these communities can be followed occasionally on one of Europe's oldest non-commercial, community radio stations Radio Študent, which would benefit from stable funding (Bezljaj 2020). The lack of community media for such a large number of communities is described as extremely negative for media pluralism in Slovenia.

The indicator on **Access to media for local/regional communities and for community media** scored medium risk with 56%. Regional and local radio and television programs have (together with PSM channels, student media and non-profit media) a status of programs of special importance. A number of local media receive funding from their municipality budgets and there are several controversial stories about those media promoting their mayor's or parties political ideas (Kučić 2019b). The PSM is not obliged to keep their correspondents and the media reported they had plans to dismiss three additional foreign correspondents

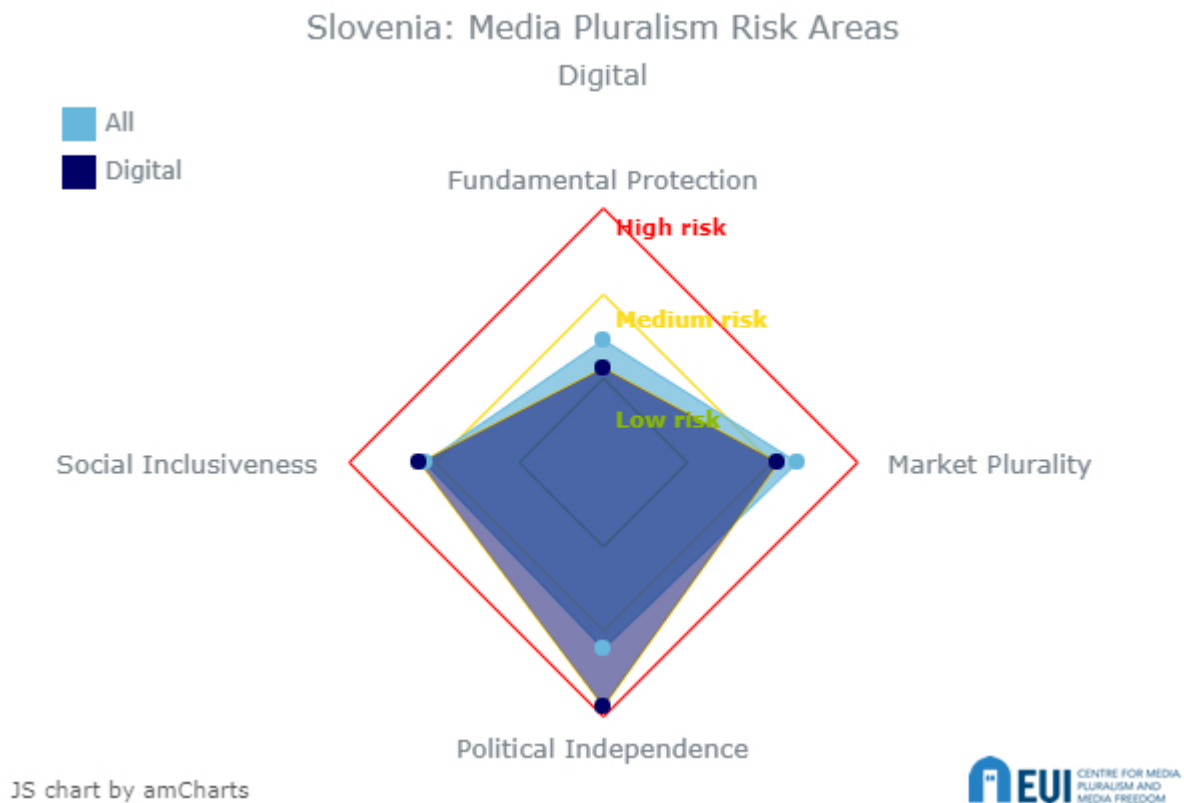
due to austerity (Petkovič 2020b). Community media is somewhat present, but not always independent. There is no systematic political interference, however the content of community media is interfered by budgetary cuts, which influence the quality and quantity of production and editorial direction. End of 2020, significant financial cuts were announced by the founder of Radio Študent the Student Organisation of the University of Ljubljana (ŠOU). Even before the announcement, they have been struggling financially for years (Bezljaj 2020).

The indicator on **Access to media for women** scored high risk with 90%. The PSM does not have a public gender equality policy. There were 31 members of the PSM programme board in 2020: seven of them were women, which amounts to 23 percent. The share of women among editors-in-chief in the leading news media was 25 percent (however, editors-in-chief of two largest TV stations in the country, TV Slovenija and Pop TV, were both women). Several past reports have shown an underrepresentation and/or stereotypical representation of women in media and there were no positive developments to this indicator in 2020 (Metina lista 2018, Metina lista 2019).

The indicator on **Media literacy** scored medium risk with 50%. While media literacy is often mentioned in government documents<sup>[5]</sup> related to the media, there is a lack of consistent policy. The legislation does not specify, who is responsible for media literacy and how he should care for it. Many have noted media literacy is insufficiently included in formal education. Although there are several campaigns and actions promoting media literacy, they are often limited to the capital of Slovenia and bigger cities or to certain groups of people, such as the older generations or scholars.

The indicator on **Protection against illegal and harmful speech** scored high risk to media pluralism with 94%. Experts notice there is a need for a legal framework countering disinformation online. There has been no research on the impact of disinformation, however there have been many examples of disinformation being spread especially on social media (and in regards to the health crisis). There is no specific legal framework targeting hate speech online, however, it is against the Constitution to spread ethnic, racial and religious hatred or intolerance, as well as to promote violence or war (Article 63 of the Constitution<sup>[6]</sup>). Public promotion of hatred, violence or impatience is also an offense within the Criminal Code (Art. 297<sup>[7]</sup>) and the Mass Media Act (Art. 8)<sup>[8]</sup>. Online hate speech online and other forms of dangerous speech, namely harassment, bullying, vulgarity, sexism towards specific journalists and media outlets, especially women (Železnik 2021) is nonetheless common, mainly on social media platforms (Kavcic 2020), where it is often exercised by visible politicians (Bratanic, Winfrey 2021). There have been no specific efforts to remove hate speech toward any population group from social media. Some legacy media and their associated social media channels also play a continuing role in spreading disinformation.

## 4. Pluralism in the online environment: assessment of the risks



Digital indicators within all four monitored areas show a need for precise legislative definitions of the online media environment, as the media laws only consider electronic publications broadly.

Within the **Fundamental Protection** area, general restrictions for freedom of expression apply for the digital environment as well; however, they are not always followed. The laws do not provide specific legal remedies for those whose freedom of expression has been violated online. The state, the ISPs or online platforms have not introduced any new restrictions upon freedom of expression online in relation to the COVID-19 pandemic (for instance to treat misinformation or fact-check information related to COVID-19) and there were regular cases of public personas (actors, TV hosts) sharing false information online, specifically on social media platforms. There were some interventions on Twitter and Facebook, specific conspiracy theory videos removed or flagged as unofficial, however that is ruled by Twitter's and Facebook's policies and community standards. Specific pages have been taken down from Facebook, after being reported by users - for instance, a few day blockade of the catholic weekly Družina's (Family) Facebook page, which is again regarded to Facebook's online policy (Merše 2020). As in previous years, the ISPs filter pages of gambling companies that do not have a concession in Slovenia, which is written in the Gaming act.

The Code of Journalism Ethics states that corrections and interventions into published content should be visible. However, digital media are in general not transparent when removing or changing content online, and there are no sanctions in this area.

There are no official cases of surveillance of searches, hacking or other similar digital attacks. There are, however, many examples of online abuse and harassment, mainly insults and threats on social media. No journalists have been obliged to download any tracking apps managed by the state or non-state actors in regards to COVID-19.

While the General Data Protection Regulation (GDPR) is valid and binding on all entities, Slovenia is still in the process of adopting a new Personal Data Protection Act (ZVOP-2), which will introduce substantive issues into the Slovenian legal order. Until then, two regulations apply and regulate the field of personal data protection at the system level, namely the GDPR and the existing Personal Data Protection Act

(ZVOP-1).

The indicator on Online platforms concentration and competition enforcement within the **Market Plurality** scored a high risk to media pluralism with 88%. Electronic media are not exempt from disclosing ownership details to the Ministry of Culture, however there is a number of websites and personal blogs, which are not owned by private bodies, do not have an editor-in-chief and are therefore not included in the Media Register. They can however still present themselves as media.

Sufficient and updated information to identify the beneficial and ultimate owners of digital native news media outlets is not always publicly accessible. The legislative articles regarding horizontal and cross-media concentration in the media sector do not specifically regulate the digital environment in the way they regulate the radio, printed and television environment. There are no signs that concentration in the digital environment is being monitored at all.

In 2019, the Slovenian Ministry of Finance announced a government proposal to submit a draft bill to the National Assembly introducing a digital services tax. In September 2020, the opposition party Left submitted a bill on the digital services tax (which would include large digital companies, such as Apple, Facebook, Amazon, Google) to the parliamentary procedure, however the proposal was denied.

The new Audiovisual Media Services Act, proposed in 2020 and to be adopted in 2021, includes the extension of certain rules for audiovisual media services to video-sharing platforms, it covers both services such as YouTube and audiovisual content shared via social media.

Before COVID-19, advertising and marketing decision-makers announced that their investments in digital advertising will increase by an average of 17% compared to 2019 (Uporabna stran 2020). Although there is no precise combined data on advertising spending in the country in general, digital agency iPROM saw an almost 50 percent increase in the amount of digital ads in 2020 compared to 2019 (iPROM 2021). Media organisations are trying to find viable business models, however they are not always successful, as the culture of crowd funding media content or donating to media is not widely established in the country. There is no data however, if the media experienced an increase or decrease of revenue coming from non-traditional revenue streams in 2020.

Within the area of **Political Independence**, presence of political control over the digital native media scored high risk, as there is a number of politically controlled digital outlets, especially locally. There is an unofficial network of digital native media, which media reports have affiliated with the governing SDS party, with their publishers or editors being either members of local committees, party candidates in elections or party members (Kučić 2019c).

2020 saw a change in the editorial leadership of Siol.net (owned by TS Media, which is owned by Telekom Slovenije), often the most popular website (web-only) in the country. Former Delo editor-in-chief and editor of the internal political department at Večer Peter Jančič took the position; it was widely believed that he works in favour of the government (DR 2020).

There are no general social media guidelines for journalists; which was coded as a high risk to media pluralism. Transparency of political advertising on online platforms (including social media) also scored high risk.

The indicator on Protection against illegal and harmful speech within the **Social Inclusiveness** area scored high risk to media pluralism. This is largely due to the absence of a legal framework countering disinformation online and an immense presence of hate speech and other forms of dangerous speech (harassment, bullying, vulgarity, sexism towards specific journalists and media outlets, especially women). The lack of comprehensive research into the harassment of journalists online and, for instance, its gender-based aspect is also in itself a problem. Although there are several initiatives in the civil society, especially

fact-checking platforms, aiming to fight against disinformation, their reach is limited. Politicians are using social media to spread disinformation and later arguing that a retweet on Twitter is not an agreement with the content they are spreading, therefore avoiding responsibility for their messages.

There has been no research on the impact of disinformation. There was an example of fake text messages explaining how the National Health Institute (NIJZ) was convincing people to change their COVID-19 test status from negative to positive, disinformation was spread about the University Medical Centre in Maribor supposedly lying about the number of positive COVID-19 tests (Švab 2020) and about the head of the government's advisory group for COVID-19 falsifying her photo of getting vaccinated (Simič 2020), to name a few.

There is no specific framework targeting hate speech online, however, it is against the Constitution to spread ethnic, racial and religious hatred or intolerance, as well as to promote violence or war. Public promotion of hatred, violence or impatience is also an offense within the Criminal Code and the Mass Media Act. Hate speech online is nonetheless common, especially on social media platforms (Kavcic 2020) and there have been no specific efforts to remove hate speech toward any population group from social media.

In December, a criminal complaint was filed against Demokracija's columnist and editor-in-chief for an opinion text spreading the idea of the superiority of one, white, race over another. Demokracija claimed the published text was a satire (G. C. 2020), however the media outlet and its editor-in-chief published a number of media content or tweets that included holocaust denial and anti-semitism, racism, and other aspects of hate speech.

## 5. Conclusions

All monitored areas showed a slight or significant deterioration compared to the findings of the MPM2020 implementation. The biggest risk to media pluralism was indicated in the area of Market Plurality (76%), followed by Political Independence (73%) and Social Inclusiveness (70%), while the area of Fundamental Protection scored medium risk with 48%.

Like elsewhere, the COVID-19 health crisis had many consequences for Slovenian society and economy, and it affected media and journalism in many ways. Newspapers and magazines were particularly hurt in terms of distribution, sales and revenues. Many newsstands closed down and as distribution of print was prohibited in cafes, restaurants and waiting rooms at doctors or hairdressers, by government's decree, officially to curb the spread of the virus. There were no measures adopted by the government, Ministry of Culture or any other relevant institution to provide additional support for the media and for journalism in 2020. Unlike many other EU countries, Slovenia and its government did not enable or promote any financial, fiscal, or tax instrument, strategy, or other potential intervention aimed at strengthening media plurality or, for example, social inclusiveness. Even more, the four draft media laws that were presented by the Ministry of Culture in 2020 (Mass Media Act, Public Broadcasting Act, Act on Slovenian Press Agency, Audio-visual Media Services Act) did not include any measures aimed at solving issues in either print or digital or radio; and included very controversial propositions regarding TV broadcasting.

Slovenian media eco-system after financially, politically, and generally exhausting year 2020 struggles in many different ways, and media-specific measures to help the sector, but in a non-discriminative way, based on politically independent selection and decision-making, are needed to help the sector. In addition, the prevention of government intrusions in many specific media outlets (such as public broadcaster RTV Slovenija and Slovenian Press Agency STA) and aggressive verbal communication and policy of the government and ruling parties (that led to much criticism from international institutions, professional organisations, and media) needs to be curbed, and attacks on journalists (particularly female) stopped.

## 6. Notes

- [1] Integrity and Prevention of Corruption Act (Official Gazette of the Republic of Slovenia no. 45/10, 26/11 and 43/11), <https://www.kpk-rs.si/kpk/wp-content/uploads/2018/06/ZintPK-ENG.pdf.pdf>
- [2] Mass Media Act (2001), [https://www.rtv slo.si/files/razno/mass\\_media\\_act.pdf](https://www.rtv slo.si/files/razno/mass_media_act.pdf)
- [3] Code of Journalism Ethics - Slovenian Association of Journalists, <https://novinar.com/drustvo-novinarjev-slovenije/o-nas/dokumenti/kodeks/>
- [4] The Radio and Television Corporation of Slovenia Act (ZRTVS-1) of 2005 states that: (Article 8) "the national channels shall be broadcast to an area covered by at least 90% of the population of Slovenia, while ethnic community channels must be broadcast in 90% of the territory inhabited by the Italian and Hungarian ethnic communities." and that (Article 3) the public service should create, produce, archive and broadcast among others "one radio and television channel each for the autochthonous Italian and Hungarian ethnic communities (hereinafter: ethnic community channel) and radio and television broadcasts for the Roma ethnic community (hereinafter: broadcasts for Roma); radio and television channels for Slovenian ethnic minorities in neighboring countries and for Slovenian expatriates and migrant workers." Available at: [https://www.rtv slo.si/files/RTV\\_Slovenija/zrtvs\\_1.pdf](https://www.rtv slo.si/files/RTV_Slovenija/zrtvs_1.pdf)
- [5] The Audiovisual Media Services Act mentions media literacy in Article 11 (protection of vulnerable social groups) stating "The Republic of Slovenia, in accordance with the law governing the media, promotes media literacy, which refers to skills, knowledge and understanding that enable users to effectively and safely use the media and audiovisual media services". Audiovisual Media Services Act is available at: <https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2015-01-3304?sop=2015-01-3304>
- [6] The Slovenian Constitution is available at: <http://www.us-rs.si/legal-basis/constitution/?lang=en>
- [7] The Criminal code of Slovenia is available at: <https://www.wipo.int/edocs/lexdocs/laws/en/si/si045en.pdf>
- [8] The Mass Media Act is available at: [https://www.rtv slo.si/files/razno/mass\\_media\\_act.pdf](https://www.rtv slo.si/files/razno/mass_media_act.pdf)

## 7. References

- Al. Ma. (2020)., 'Pismo odgovornih urednikov: "Pod pritiski ne bomo klonili"', *Rtvslo.si*, 28 October, viewed 20 January 2021, <https://www.rtvslo.si/slovenija/pismo-odgovornih-urednikov-pod-pritiski-ne-bomo-klonili/540482>.
- Bayer, L. (2021). 'Inside Slovenia's war on the media', *Politico*, 16 February, viewed May 20 2021, <https://www.politico.eu/article/slovenia-war-on-media-janez-jansa/>.
- Bezljaj, M. (2020). 'Radio Študent na robu prepada', *Delo*, 7 July, viewed 20 January 2021, <https://www.delo.si/novice/slovenija/radio-studnet-na-robu-propada/>.
- Bratanic, J., & Winfrey, M. (2021). 'A Trump-Inspired Twitter Troll Gets Chance to Set the EU Agenda', *Bloomberg*, 30 June, viewed 1 July 2021, <https://www.bloomberg.com/news/articles/2021-06-30/a-trump-inspired-twitter-troll-gets-chance-to-set-the-eu-agenda>.
- Bulatović, K. (2020), 'Janša »izginil« iz mladinske TV-oddaje o populizmu', *Ostro.si*, 15 December, viewed 20 January 2021, <https://www.ostro.si/si/zgodbe/jansa-izginil-iz-mladinske-tv-oddaje-o-populizmu>.
- Cirman, P., & Vuković, V. (2020). 'Janša želi nadzor še nad POP TV', *Necenzurirano.si*, 3 December, viewed 20 January 2021, <https://necenzurirano.si/clanek/preiskovalne-zgodbe/jansa-zeli-nadzor-se-nad-pop-tv-830888>.
- Department of Journalism, Faculty of Social Sciences (2020). 'Poziv k umiku predlogov medijskih zakonov iz zakonodajne procedure', *Delo*, 31 August, viewed 20 January 2021, <https://www.delo.si/novice/slovenija/poziv-k-umiku-predlogov-medijskih-zakonov-iz-zakonodajne-procedure/>.
- DR. (2020). 'Jančič prevzema državni Siol, glasovalo malo novinarjev', *Večer*, 4 April, viewed 20 January 2021, <https://www.vecer.com/slovenija/jancic-prevzema-drzavni-siol-brez-vecinske-podpore-novinarjev-10152669>.
- EFJ. (2020). 'Serious concerns over suspension of funding to Slovenian Press Agency', 7 December, viewed 20 January 2021, <https://europeanjournalists.org/blog/2020/12/07/serious-concerns-over-suspension-of-funding-to-slovenian-press-agency/>.
- Civil Liberties Union for Europe, Greenpeace European Unit (2020). 'Locking down critical voices', [https://www.greenpeace.org/static/planet4-eu-unit-stateless/2020/09/07bf7b31-locking-down-critical-voices\\_final.pdf](https://www.greenpeace.org/static/planet4-eu-unit-stateless/2020/09/07bf7b31-locking-down-critical-voices_final.pdf).
- Committee to Protect Journalists (2020). 'Database of attacks on the press', viewed 20 January 2021, <https://cpj.org/data/>.
- Council of Europe. (2020). 'CoE Commissioner for Human Rights issues a Human Rights Comment on SLAPPs', 27 October, viewed 20 January 2021, <https://www.coe.int/en/web/media-freedom/-/coe-commissioner-for-human-rights-issues-a-human-rights-comment-on-slapps>.
- Čakš, P. (2020). 'Je lokalno dogajanje še javni interes?', *Večer*, 15 August, viewev 20 January 2021, <https://www.vecer.com/v-soboto/je-lokalno-dogajanje-se-javni-interes-10207986>.
- DK, STA (2020). 'Pomoč medijem v času krize', *Mladina*, 28 March, viewed 20 January 2021, <https://www.mladina.si/197035/pomoc-medijem-v-casu-krize/>.
- EACEA (2021). 'Slovenija - Prebivalstvo: demografsko stanje, jeziki in veroizpovedi', 8 March, viewed 20 June 2021, [https://eacea.ec.europa.eu/national-policies/eurydice/content/population-demographic-situation-languages-and-religions-77\\_sl](https://eacea.ec.europa.eu/national-policies/eurydice/content/population-demographic-situation-languages-and-religions-77_sl).
- European Commission. (2020). *2020 Rule of Law Report Country Chapter on the rule of law situation in Slovenia*, viewed 20 January 2021, <https://vega.siol.net/media/files/2020-39/porocilo-eu-slovenija.pdf>.
- Faculty of Social Sciences. (2020). 'Premisleki o prihodnosti javnih medijev', viewed 20 January 2021, <https://www.fdv.uni-lj.si/docs/default-source/zalozba/premisleki-o-prihodnosti-javnih-medijev---za-web.pdf>.
- G. C. (2020). "'Glosa" v Demokraciji sprožila prvo ovadbo, kako se bo odzvalo tožilstvo?', *Rtvslo.si*, 7 December, viewed 20 January 2021, <https://www.rtvslo.si/slovenija/glosa-v-demokraciji-sprozila-prvo->



[ovadbo-kako-se-bo-odzvalo-tozilstvo/544862](https://www.24ur.com/novice/slovenija/zaljivke.html).

Grešovnik, T. (2020). 'Napadi na novinarje: 'Do žaljk v javnem govoru smo kot družba postali brezbržni'', *24ur.com*, 24 February, viewed 20 January 2021, <https://www.24ur.com/novice/slovenija/zaljivke.html>.

Higgins, A. (2021). 'Wielding Twitter, Europe's 'Marshal Twito' Takes Aim at the Media', *The New York Times*, 16 June, viewed 20 June 2021, <https://www.nytimes.com/2021/06/16/world/europe/slovenia-jansa-press-freedom-twitter.html>.

Hreščak, A (2020). 'Tudi v HSE kaznujejo kritične medije', *Dnevnik*, 21 December, viewed 20 January 2021, <https://www.dnevnik.si/1042945817/posel/novice/tudi-v-hse-kaznujejo-kriticne-medije>.

Hreščak, A. (2020b). 'Ukom v svoji nameri povozil celo opozorila vladnih pravnikov', *Dnevnik*, 9 December, viewed 20 January 2021, <https://www.dnevnik.si/1042944968/slovenija/ustavitev-financiranja-sta-naj-bi-bila-nezakonita>.

Integrity and Prevention of Corruption Act (2010). [2. Integrity and Prevention of Corruption Act of 2010\\_SLO.pdf \(europam.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010L0025) [[Slovenia Integrity and the Prevention of Corruption Act 2010\\_en.pdf \(worldbank.org\)](https://www.worldbank.org/en/publications/2010/slovenia-integrity-and-the-prevention-of-corruption-act-2010-en.pdf)]

IPI. (2020). 'Photojournalist Borut Živulovič hospitalised covering violent protests in Slovenia', 6 November, viewed 20 January 2021, <https://ipi.media/photojournalist-borut-zivulovic-hospitalised-covering-violent-protests-in-slovenia/>.

iPROM. (2021). 'iPROM lani s 50 odstotkov več prikazanih oglasov kot leta 2019', 13 January, viewed 20 January 2021, <https://iprom.si/iprom-lani-s-50-odstotkov-vec-prikazanih-oglasov-kot-leta-2019/>.

Kavcic, B. (2020). 'Slovenian media fear fallout from government virus campaign', *AFP*, 19 April, viewed 20 January 2021, <https://news.yahoo.com/slovenian-media-fear-fallout-government-virus-campaign-081026706.html>.

Kingsley, P. (2018). 'Safe in Hungary, Viktor Orban Pushes His Message Across Europe', *The New York Times*, 4 June, viewed 20 May 2021, <https://www.nytimes.com/2018/06/04/world/europe/viktor-orban-media-slovenia.html>.

*Kodeks novinarjev Slovenije (Code of Journalists of the Republic of Slovenia)*. (2002). viewed 20 June 2021, <https://accountablejournalism.org/ethics-codes/Slovenia-Journalists>. Korenič, R. (2021). 'In the fourth quarter of 2020, the Slovenian economy declined by 4.5% and by 5.5 in 2020', Statistical Office of the Republic of Slovenia, 26 February, viewed 23 April 2021, <https://www.stat.si/StatWeb/en/News/Index/9411>.

Košak, K. (2020). 'Po aferi s testnimi frekvencami 5G obsežen nadzor, ki ni pokazal nepravilnosti', *Dnevnik*, 11 January, viewed 20 January 2021, <https://www.dnevnik.si/1042919223/posel/novice/po-aferi-s-testnimi-frekvencami-5g-obsezen-nadzor-ki-ni-pokazal-nepravilnosti->.

KPK. (2020). 'Annual Report', viewed 20 January 2021, <https://www.kpk-rs.si/kpk/wp-content/uploads/2020/03/Letno-porocilo-2019.pdf>.

Kučič, L. (2019). 'Infografika: Madžarski medijski sistem v Sloveniji', *Pod črto*, 3 December, viewed 20 January 2021, <https://podcrto.si/infografika-madzarski-medijski-sistem-v-sloveniji/>.

Kučič, L. (2019b) 'Povzetek preiskave: kako župani zlorablajo občinska glasila', *Pod črto*, 6 June, viewed 20 January 2020, <https://podcrto.si/povzetek-preiskave-kako-zupani-zlorablajo-obcinska-glasila/>.

Kučič, L. (2019c). 'Infografika: Internetni mediji SDS', *Pod črto*, 10 December, viewed 20 January 2021, <https://podcrto.si/infografika-internetni-mediji-sds/>.

Kučič, L. (2020). 'Infografika: Mediji Martina Odlazka', *Pod črto*, 4 December, viewed 20 January 2021, <https://podcrto.si/infografika-mediji-martina-odlazka/>.

Kučič, L. (2020b) 'Dnevni časopisi (3. del): kako lastniki Dela vplivajo na poročanje novinarjev', *Pod črto*, 4 June, viewed 20 January 2021, <https://podcrto.si/dnevni-casopisi-3-del-kako-lastniki-dela-vplivajo-na-porocanje-novinarjev>.

Kunaver, N. (2020). 'Črno na belem: maske podjetja Acron niso skladne z zakonodajo SLO in EU', *24ur.com*, 6 July, viewed 20 January 2021, <https://www.24ur.com/novice/korona/crno-na-belem-maske->

[podjetja-acron-niso-skladne-z-zakonodajo-slo-in-eu.html](https://www.vecer.com/slovenija/napovedani-bliskoviti-in-drasticni-posegi-v-skodo-medijev-odmevajo-10194936).

Lesjak Tušek, P. & Petkovič, B. (2020). 'Napovedani bliskoviti in drastični posegi v škodo medijev odmevajo', *Večer*, 13 July, viewed 20 January 2021, <https://www.vecer.com/slovenija/napovedani-bliskoviti-in-drasticni-posegi-v-skodo-medijev-odmevajo-10194936>.

Lovšin, P. (2020). 'Vrhovno sodišče: Objava prisluhov v javnem interesu', *Dnevnik*, 1 June, viewed 20 January 2021, <https://www.dnevnik.si/1042930744>.

Malovrh, P. (2020). 'Slovenija ne velja več za odprto družbo', *Delo*, <https://www.delo.si/novice/slovenija/slovenija-ne-velja-vec-za-odprto-druzbo/>.

Mapping Media Freedom. (2020). 'Slovenia: Interior minister calls for criminal prosecution of journalists covering lockdown protest', <https://mappingmediafreedom.usahidi.io/posts/23283>.

Mass Media Act.(2006). [Microsoft Word - SN-Ėistopis - veljavnost 24 06 2006-ang.doc \(rtvslo.si\)](https://www.rtslo.si/microsoft-word-sn-estopis-veljavnost-24-06-2006-ang.doc)

Merše, P. (2020). 'Po posredovanju slovenskih cenzorjev je Facebook blokiral katoliški tednik Družina', *Domovina*, 28 October, viewed January 2021, <https://www.domovina.je/po-posredovanju-slovenskih-cenzorjev-facebook-blokiral-katoliski-tednik-druzina/>.

Metina lista. (2018). 'Delež žensk na vodstvenih položajih se znižuje', *Metina lista*, 8 march, viewed 20 January 2021, <https://metinalista.si/delez-zensk-na-vodstvenih-polozajih-se-znizuje/>.

Metina lista. (2019). 'Pregled leta 2018 - Ženske v časopisnih medijih', *Metina lista*, 20 February, viewed 20 January 2021, <https://metinalista.si/pregled-leta-2018-zenske-v-casopisnih-medijih/>.

Ministry of Culture. (2020). 'Media Register', viewed January 2021, <https://rmsn.ekultura.gov.si/razvid/mediji>.

M.R. (2020). 'Na platformi Sveta Evrope opozarjajo pred številnimi tožbami Roka Snežiča proti slovenskim novinarjem', *Večer*, 30 September, viewed 20 January 2021, <https://www.vecer.com/slovenija/rok-snezic-proti-portal-necenzurirano-vlozil-kar-39-tozb-10222835>.

OECD. (2020) 'OECD Economic Surveys: Slovenia', viewed 20 January 2021, <https://www.oecd.org/economy/surveys/slovenia-2020-OECD-economic-survey-overview.pdf>.

Open Ownership. (2020). 'Slovenia', viewed 20 January 2021, <https://www.openownership.org/map/#SI>.

Ozsvath, S. (2021). 'Prime Minister Janez Jansa, Slovenia's Marshal Tweeto and the media', *Deutsche Welle*, 4 March, viewed 20 June 2021, <https://www.dw.com/en/prime-minister-janez-jansa-slovenias-marshal-tweeto-and-the-media/a-56764735>.

Petkovič, B. (2020) "'Zdravstveni razlogi so samo izgovor.'" Zakaj Janševa vlada ne priskoči na pomoč medijem?', *Večer*, 4 June, viewed 20 January 2021, <https://www.vecer.com/slovenija/zdravstveni-razlogi-so-samo-izgovor-zakaj-janseva-vlada-ne-priskoci-na-pomoc-medijem-10178565>.

Petkovič, B. (2020b). 'Dopisniška mreža Radiotelevizije Slovenija: Se bo Karmen Švegl res morala posloviti?', *Večer*, 19 June, viewed 20 January 2021, <https://www.vecer.com/slovenija/dopisniska-mreza-radiotelevizije-slovenija-se-bo-karmen-svegl-res-morala-posloviti-10185687>.

Pihlar, T. (2020). 'Šlamastika in manipulacije Aleksandre Pivec s tajnostjo podatkov', *Dnevnik*, 18 January, viewed 20 January 2021, <https://www.dnevnik.si/1042919847/slovenija/slamastika-in-manipulacije-aleksandre-pivec-s-tajnostjo-podatkov->.

Public Media Alliance. (2021). 'Slovenia: Pressure builds for public media and press freedom', 26 May, viewed 20 June 2021, <https://www.publicmediaalliance.org/slovenia-pressure-builds-for-public-media-and-press-freedom/>.

R.A. (2020). 'Vojaki s tožbami nad Jadranko Juras, RTV in Dejana Baboska', *Siol.net*, 8 December, viewed 20 January 2021, <https://siol.net/novice/slovenija/sindik-vojakov-s-tozbami-nad-jadranko-juras-rtv-in-dejana-baboska-540818>.

Rak, P., Bulatović, K., Zupanič, M. (2018). 'Novi obrazi slovenskega populizma', *Delo*, 30 March, viewed 20 June 2021, <https://old.delo.si/novice/politika/novi-obrazi-slovenskega-populizma.html>.

Roglič, M. (2020). 'Urad vlade za komuniciranje: Dva kandidata za direktorja, imenovanje se nasmiha Urbaniji', *Dnevnik*, 4 August, viewed 20 January 2021, <https://www.dnevnik.si/1042935652>.

RSF. (2020). '2020 World Press Freedom Index', viewed 20 January 2021, <https://rsf.org/en/slovenia>.

RSF. (2020b). 'Slovenia: Trump's disciple attacks journalists and introduces a systemic change', *RSF*, 26 May, viewed 20 June 2021, <https://rsf.org/en/news/slovenia-trumps-disciple-attacks-journalists-and-introduces-systemic-change>.

RSF (2021). '2021 World Press Freedom Index', viewed 20 June 2021, <https://rsf.org/en/slovenia>.

Savič, D. (2020). 'Slovenska vojska v službi madžarskega sovraštva 8', *The L Files*, 15 September, viewed 20 January 2021, <https://www.dsavic.net/2020/09/15/slovenska-vojska-v-sluzbi-madzarskega-sovrastva-8/>.

Simič, M. (2020). 'Fotografija Beovičeve med cepljenjem proti covidu-19 je pristna', *Ostro.si*, 29 December, viewed 20 January 2021, <https://www.ostro.si/si/razkrinkavanje/objave/fotografija-beoviceve-med-cepljenjem-proti-covidu-19-je-pristna>.

Simič, M. (2021). 'Ukom je STA spraševal o uredniških odločitvah', *Ostro.si*, 15 March, viewed 20 March 2021, <https://www.ostro.si/si/razkrinkavanje/objave/ukom-je-sta-spraseval-o-urednikih-odlocitvah>.

Slovene Association of Journalists. (2020). 'Anketa: Novinarji s(m)o preobremenjeni in premalo plačani', 14 February, viewed 20 January 2021, <https://novinar.com/novica/anketa-novinarji-smo-preobremenjeni-in-premalo-placani/>.

Slovene Association of Journalists. (2020b). 'Za paket pomoči medijem in proti mačehovskemu odnosu države', 25 April, viewed 20 January 2021, <https://novinar.com/novica/za-paket-pomoci-medijem-in-proti-macehovskemu-odnosu-drzave/>.

Slovene Association of Journalists. (2020c). 'Odpuščanja na Delu – izigravanje zakonodaje in socialnega dialoga', 18 February, viewed 20 January 2021, <https://novinar.com/novica/odpuscanja-na-delu-izigravanje-zakonodaje-in-socialnega-dialoga/>.

STA. (2020). 'IP: Sodišča ne bi smela zavračati dostopa do informacij javnega značaja', *24ur.com*, 17 November, viewed 20 January 2021, <https://www.24ur.com/novice/slovenija/sodba-vrhovnega-sodisca-bistveno-vpliva-na-netransparentnost-sodisc.html>.

STA. (2020b). 'Planet TV Sold to Hungary's TV2 Media, Associated with Orban', *Total Slovenia News*, 8 July, viewed 20 January 2021, <https://www.total-slovenia-news.com/business/6568-planet-tv-sold-to-hungary-s-tv2-media-associated-with-orban>.

STA. (2020c). 'Borut Rončević imenovan za člana nadzornega sveta RTVS', *Delo*, 19 November, viewed 20 January 2021, <https://www.delo.si/novice/slovenija/borut-roncevic-imenovan-za-clana-nadzornega-sveta-rtvs/>.

STA. (2020d). 'DNS: Za vsiljevanje aneksa o 30-odstotnem izplačilu medijem ni podlage', *Delo*, 19 July, viewed 20 January 2021, <https://www.delo.si/novice/slovenija/dns-za-vsiljevanje-aneksa-o-30-odstotnem-izplacilu-ni-podlage>.

STA. Gr.G (2020). 'Pravnik Toplak po vzoru drugih evropskih držav poziva k zakonski ureditvi javnosti sodb', *Večer*, 30 October, viewed 20 January 2021, <https://www.vecer.com/slovenija/pravnik-toplak-po-vzoru-drugih-evropskih-drzav-poziva-k-zakonski-ureditvi-javnosti-sodb-10225851>.

STA, M.R. (2020). 'Poseg v neodvisnost? Vlada bi osem ključnih regulatorjev združila v dve agenciji', *Večer*, 2 October, viewed 20 January 2021, <https://www.vecer.com/slovenija/poseg-v-neodvisnost-vlada-bi-osem-kljucnih-regulatorjev-zdruzila-v-dve-agenciji-10223086>.

STA, M.S. (2020). 'Svetovni dan svobode medijev poziva k novinarstvu brez strahu in uslug', *24ur.com*, 3 May, viewed 20 January 2021, <https://www.24ur.com/novice/korona/svetovni-dan-svobode-medijev-poziva-k-novinarstvu-brez-strahu-in-uslug.html>.

STA. (2021). 'Poslanci zavrnil vladni načrt o združitvi regulatorjev', *Delo*, 23 April, viewed 20 May 2021, <https://www.delo.si/novice/slovenija/poslanci-zavrnilo-vladni-nacrt-o-zdruzitvi-regulatorjev/>.

SURS (2020). 'Prebivalci Slovenije', viewed 20 January 2021, <https://www.stat.si/StatWeb/Field/Index/17>.

Škerl Kramberger, U. (2020). 'Nadzorniki RTVS v patpoložaju', *Dnevnik*, 30 September, viewed 20 January

2021, <https://www.dnevnik.si/1042939984/slovenija/nadzorniki-rtvs-v-patpolozaju>.

Škerl Kramberger, U, STA. (2020). 'Direktor Kadunc ostaja, SDS močno poražena', *Dnevnik*, 2 November, viewed 20 January 2021, <https://www.dnevnik.si/1042942420/slovenija/seja-odbora-za-kulturo-o-vladnih-pritiskih-na-javne-medije-se-brez-sklepov->.

Švab, N. (2020). 'Še eno lažno sporočilo. UKC Maribor: Medicinske sestre z odvozom brisov niso povezane', *24ur.com*, 26 October, viewed 20 January 2021, <https://www.24ur.com/novice/korona/se-eno-lazno-sporocilo-ukc-maribor-medicinske-sestre-z-odvozom-brisov-niso-povezane.html>.

Transparency International Slovenia. (2016). 'Nevidni lastniki: Transparentnost dejanskega lastništva', 2 December, viewed 23 April 2021, [https://www.transparency.si/wp-content/uploads/2016/04/nevidni\\_lastniki\\_report.pdf](https://www.transparency.si/wp-content/uploads/2016/04/nevidni_lastniki_report.pdf).

Uporabna stran. (2020). 'Digitalnemu oglaševanju bo tudi v letu 2020 namenjenih največ oglaševalskih sredstev, je pokazala raziskava iPROMa in Valicon', 26 May, viewed 20 January 2021, <https://www.blog.uporabnastran.si/2020/05/26/proracun-digitalno-oglasovanje-2020-digitalnemu-oglasovanju-bo-v-letu-2020-namenjenih-najvec-oglasevalskih-sredstev-iprom-valicon-raziskava/>.

Vertačnik, Ž. (2020). 'Vlada navija za enakopravnost medijev, tudi portalom blizu SDS odpira vrata do davkoplačevalskih milijonov', *Večer*, 23 October, viewed 20 January 2021, <https://www.vecer.com/slovenija/vlada-navija-za-enakopravnost-medijev-tudi-portalom-blizu-sds-odpira-vrata-do-davkoplacevalskih-milijonov-10225046>.

Vežjak, B. (2020). '(Pre)poznate strankarske medije?', *Mladina*, 12 March, viewed 20 January 2021, <https://www.mladina.si/196476/pre-poznate-strankarske-medije/>.

Vladisavljević, A. (2021). 'Media Watchdogs Warn of 'Hostile Climate' for Slovenia's Press', *Balkan Insight*, 16 March, viewed 20 June 2021, <https://balkaninsight.com/2021/03/16/media-watchdogs-warn-of-hostile-climate-for-slovenias-press/>.

Vorkapič, M. (2020). 'Krizno (ne)komuniciranje vlade ter zmeda in negotovost pri ljudeh', *24ur.com*, 11 July, viewed 20 January 2021, <https://www.24ur.com/novice/korona/krizno-komuniciranje.html>.

Wiseman, J. (2020). 'New Administration, Old Agenda: Press Freedom Strained Again in Slovenia Under Veteran PM Janša', *IPI*, 1 September, viewed 20 January 2021, <https://ipi.media/new-administration-old-agenda-press-freedom-strained-again-in-slovenia-under-veteran-pm-jansa/>.

*Zakon o Radioteleviziji Slovenija (Radio and Television Corporation of Slovenia Act)*. (2005). viewed 20 June 2021, <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO4461>.

*Zakon o Slovenski tiskovni agenciji (Act on the Slovenian Press Agency)*. (2011). viewed 20 June 2021, <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO5868>.

Železnik, N. (2021). 'Novinarke so tarče virtualnih »likvidacij«', *Revija Zarja*, 22 March, viewed 1 July 2021, <https://revijazarja.si/clanek/zgodbe/605a5266d3568/novinarke-so-tarce-virtualnih-likvidacij>.

## Annexe I. Country Team

First name	Last name	Position	Institution	MPM2021 CT Leader
<i>Marko</i>	<i>Milosavljevic</i>		<i>University of Ljubljana</i>	X
<i>Romana</i>	<i>Biljak Gerjevic</i>	<i>Research assistant</i>	<i>Faculty of Social Sciences</i>	

## Annexe II. Group of Experts

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 composing the MPM2021. Consulting the point of view of recognized experts aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as subjective, and therefore to ensure the accuracy of the final results of the MPM. However, it is important to highlight that the final country report does not necessarily reflect the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

First name	Last name	Position	Institution
<i>Tanja</i>	<i>Kersevan Smokvina</i>	<i>Ex-State Secretary / Regulatory Expert</i>	<i>Faculty of Social Sciences</i>
<i>Nika</i>	<i>Kunaver</i>	<i>Journalist / Management Board Member</i>	<i>POP TV / Slovene Association of Journalists</i>
<i>Cene</i>	<i>Grcar</i>	<i>Legal Expert</i>	<i>Pro Plus TV / Association of Broadcasters</i>
<i>Melita</i>	<i>Poler Kovacic</i>	<i>Professor of Journalism</i>	<i>Faculty of Social Sciences</i>

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