



Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

Country report: Bulgaria

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Annexe 1. Country Team

Annexe 2. Group of Experts

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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 and Candidate Countries of the European Union, and considering both online and offline news environments. This narrative report has been produced within the framework of the implementation of the MPM carried out in 2019, under a project financed by a preparatory action of the European Parliament. The implementation was conducted in 28 EU Member States, Albania and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological note

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

In Bulgaria the CMPF partnered with Orlin Spassov (Foundation Media Democracy / Sofia University “St. Kliment Ohridski”), Nelly Ognyanova (Sofia University “St. Kliment Ohridski”), Nikoleta Daskalova (Foundation Media Democracy), who conducted the data collection, scored and commented the variables in the questionnaire and interviewed relevant experts. The report was reviewed by CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts).

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

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

Table 1: Areas and Indicators of the Media Pluralism Monitor

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 allows for an extraction of a digital-specific risk score and the report contains a specific analysis of risks related to the digital news environment.

The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk.

On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, the MPM2020 scores may not be fully comparable with MPM2017 ones. For more details, see the CMPF report on MPM2020, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

The total population of Bulgaria is 7 000 039 (December 2018, NSI 2019a). According to the latest census (2011), the Bulgarian ethnic group is the largest with 84.8% of the Bulgarian population. The Turkish ethnic group is the second largest and making up 8.8%. The Romany group is the third and accounts for 4.9%. The adult literacy rate reaches 98.4% (UIS 2013). Bulgarian is the mother tongue for 85.2% of the population, Turkish being the second with 9.1% and Roma with 4.2% (NSI 2011).

The economic situation is relatively stable, but at very low level. In 2018, as in previous years, Bulgaria was the member state with the lowest per-capita GDP, at 50.8% below the EU average (EUROSTAT 2019). Bulgaria has remained the poorest country in the EU, although unemployment rates are 3.7%, below the average for EU 28 (6.2%) (EUROSTAT 2020). The economy faces many serious problems, including, amongst others, corruption – corruption perceptions score ranks 74 of 180 countries (Transparency International 2019).

In April 2017, the powerful centre-right GERB party signed a coalition agreement to govern the country with United Patriots, an alliance of three nationalist parties (VMRO-BND, NFSB and, until 2019, Ataka). The participation of extreme nationalist parties in the government is a source of instability. There is a constant confrontation between the government and the president. The political process is characterized by numerous scandals and verbal attacks. Against this background, many media (online media, tabloid newspapers, party TVs, social networks) have contributed to the escalation of polarization in society by frequent use of hate speech and smear campaigns.

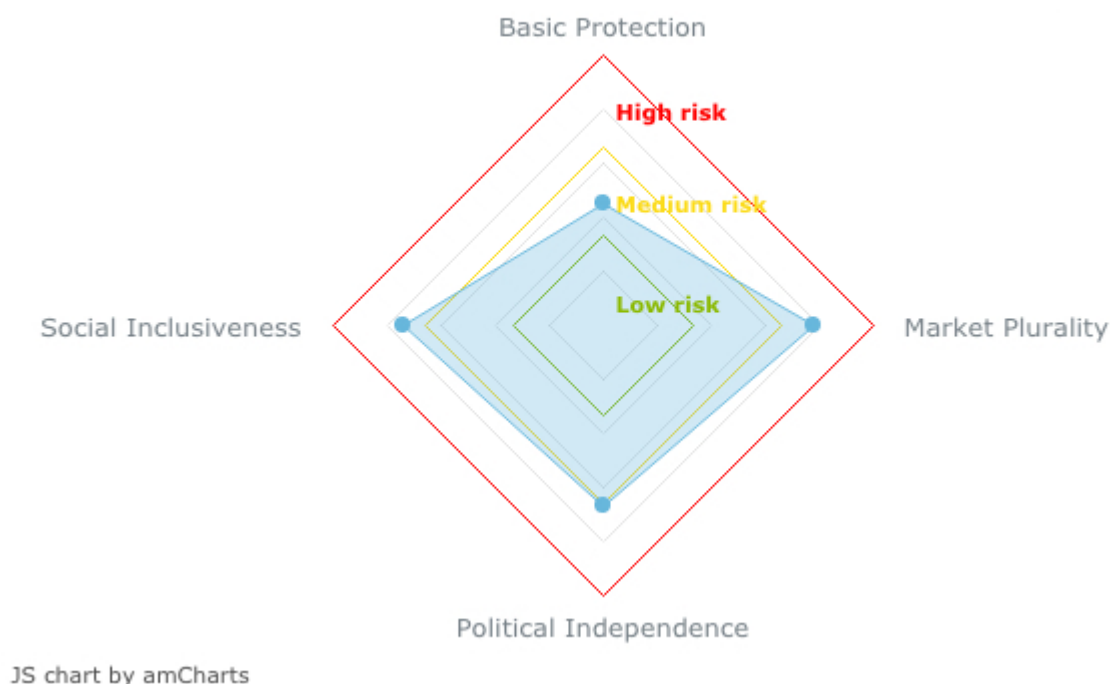
The media market is diverse but still highly dependent on political and economic influences. The total number of newspapers in 2018 is 239 (the dailies are 37). There are 116 registered TV operators. The radio operators are 83. The total TV and radio revenues are respectively 232 434 000 and 34 720 000 EUR. Television's share of total advertising investment in 2019 is 55%. The tendency is for a gradual redistribution of spending from television to digital media by an average of 1.5% a year. Mobile advertising and online video are becoming the main drivers of the growth of digital media (NSI 2019b; EconomicBg 2019).

In 2019, 75.1% of the households had access to the internet at home (a growth of 3.0%, compared to the previous year). The relative share of households using broadband internet connection is 74.9% (NSI 2019c).

The 2019 World Press Freedom Index of Reporters Without Borders places Bulgaria at 111th position among 180 monitored countries (last place in the EU) (RSF 2019a). In the Freedom in the world ranking of Freedom House, in 2019 Bulgaria gets 80 out of 100 points and is rated 'free'. At the same time, the report states that 'while the media sector remains pluralistic, ownership concentration is a growing problem. Journalists encounter threats or violence in the course of their work. Ethnic minorities, particularly Roma, face discrimination' (Freedom House 2019). A number of Bulgarian non-governmental organizations point out a wide range of ongoing negative trends: interventions by media owners, advertisers and politicians in the work of the media, spread of self-censorship, deteriorating working conditions for media professionals, etc. New and particularly worrying tendency during the observed period was related to the pressure on PSM and to the management of PSM, which undermined the independence of these media. There are a number of examples of dismissal of critical journalists (both in PSM and in large private media).

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

Bulgaria: Media Pluralism Risk Areas



JS chart by amCharts

In Bulgaria, especially high risks for media pluralism were detected primarily in the areas of Market Plurality (78%) and Social Inclusiveness (74%). Three of the **Market Plurality** indicators point toward a particularly high risk: Online platforms concentration and competition enforcement (97%), Commercial and owner influence over editorial content (90%) and News media concentration (90%). Three indicators in the Social Inclusiveness domain point to high risk: Access to media for local/regional communities and for community media (88%), Access to media for women (79%) and Access to media for minorities (75%).

There are also significant risks to media pluralism in Bulgaria identified within the **Political Independence** area (average risk 67%). Two indicators within this domain face a particularly high risk: Independence of PSM governance and funding (97%) and Editorial autonomy (79%).

The area of **Basic Protection** scores low to medium risk (average risk 45%). The main problems here are identified within the indicators Universal reach of traditional media and access to the Internet (58%) and Journalistic profession, standards and protection (55%).

To sum up, the four observed indicators with the highest individual risk are: independence of PSM governance and funding; online platforms concentration and competition enforcement; commercial and owners' influence over editorial content; and news media concentration. It is obvious that the problems do not cover only one or two spheres but are much more diverse and deep. They affect both traditional news companies and online platforms as well as both public and private sector media.

The high risk in the field of social inclusiveness deserves special attention. Local and regional media face serious problems in terms of independence and sustainability and at the same time the state does not support them through subsidies or other policy measures. In parallel, access to media for minorities and people with disabilities remains problematic.

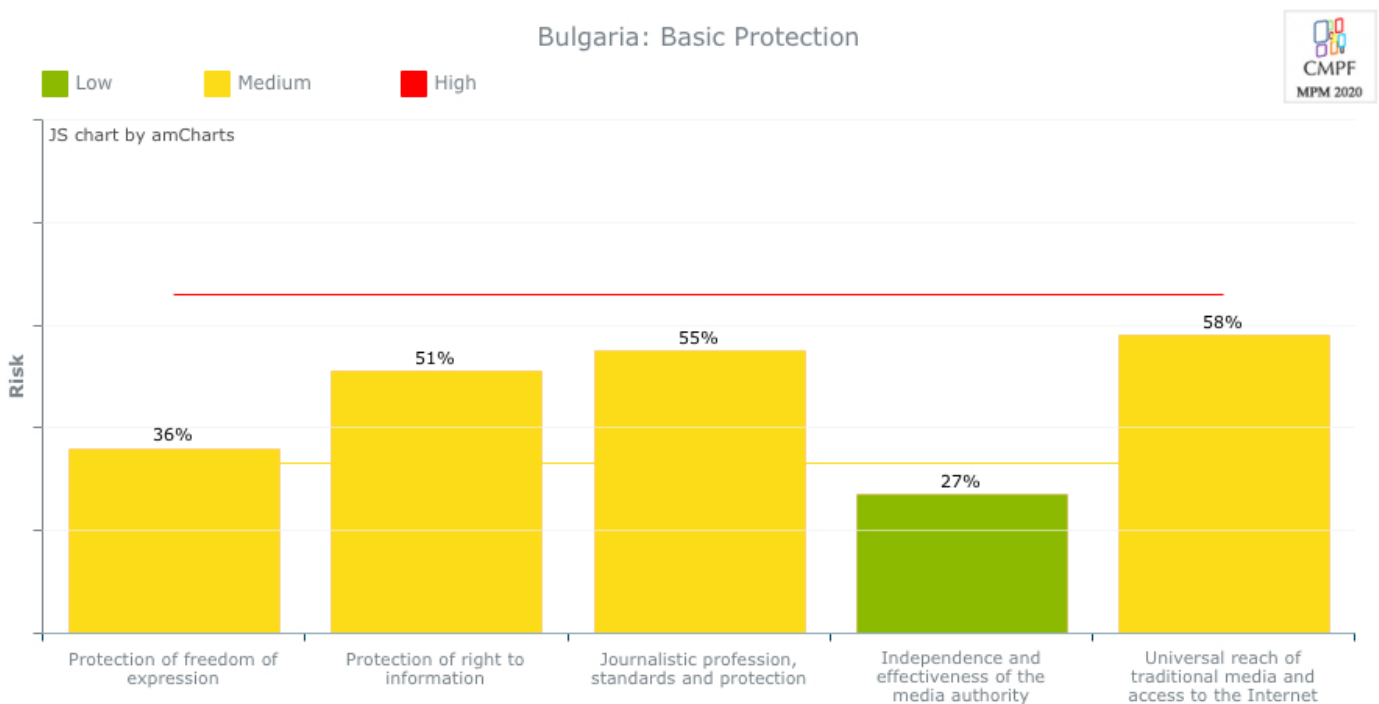
There is only one indicator scoring low risk: Independence and effectiveness of the media authority (27%). Positive results here are mostly due to available legal provisions.

As a whole, as in previous years, the mixed performance of Bulgaria mainly refers to the fact that while in most cases

the legal framework introduces necessary standards, they are frequently not effectively implemented in practice. Even within indicators with lower risk there are often discrepancies between legal provisions and implementation (for example regarding the media authorities, transparency of media ownership and protection of freedom of expression). These peculiarities must be taken into account when making an overall assessment of media pluralism in Bulgaria.

3.1. Basic Protection (45% - medium risk)

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



The indicator **Protection of freedom of expression** scores medium risk (36%). Although freedom of expression is explicitly recognized in the Constitution and media legislation, there are systematic violations of freedom of speech in practice. As emphasized by watchdog organizations and professionals, political and corporate pressure over journalists persists, while critical media outlets are exposed to harassment from state authorities. In addition, against the backdrop of a general weakness of the rule of law, defamation lawsuits are being used for the intimidation of investigative journalists.

Protection of the right to information is at medium risk (51%). In 2019, amendments to the Administrative Procedure Code and the Access to Public Information Act transformed the two-instance system of judicial review of administrative acts, including access to public information proceedings, into a one-instance procedure in the hands of regional administrative courts. This has opened the door to feudalization of administrative justice. In practice, although the amount of open public data sources has increased in recent years, journalists still face obstacles when accessing public information.

The indicator **Journalistic profession, standards and protection** scores medium risk (55%). The access to the profession is open and free but there are not fully effective guarantees of editorial independence. Journalists face poor working conditions and lack of adequate trade union protection. What is particularly alarming is that, in the past two years, journalists have been object of physical attacks, assaults, arbitrary detention and death threats. Against this

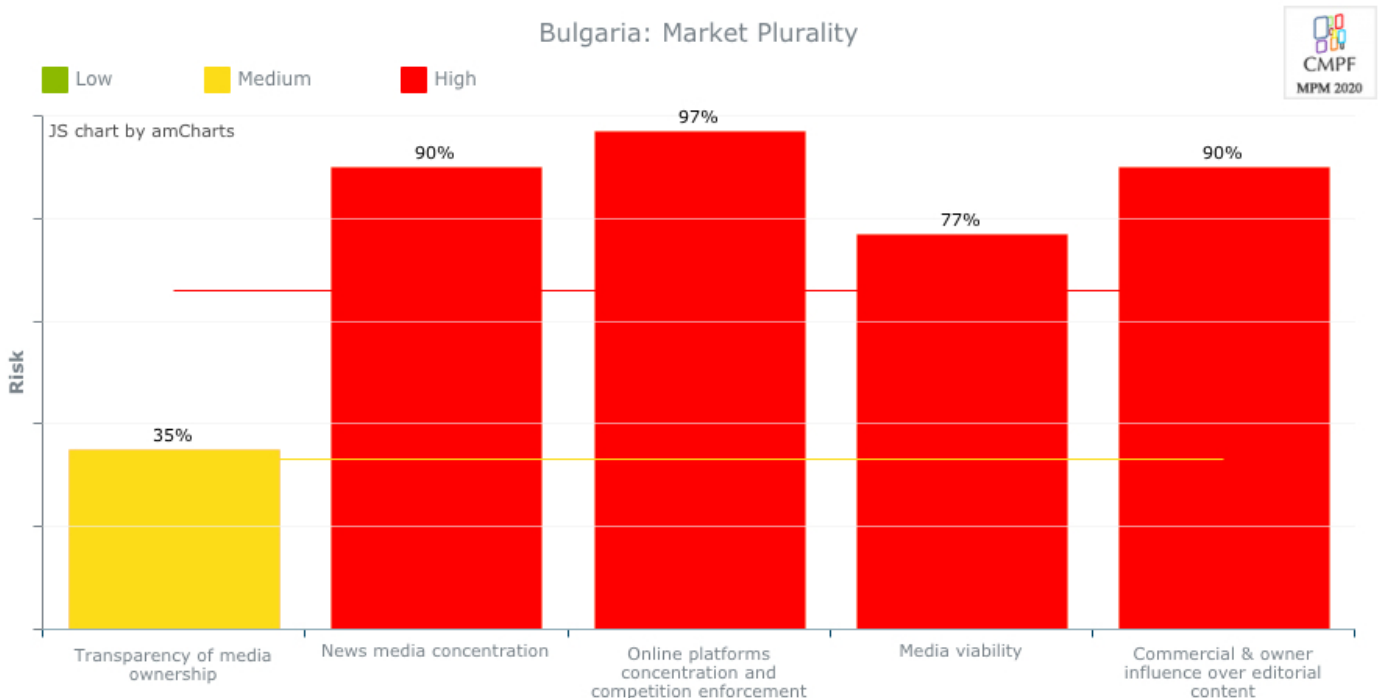
background, the state is not only not providing a safe and enabling environment for journalists but is actually among the leading actors in threatening media independence due to political, administrative and judicial pressure. A positive trend in 2019 is the growing solidarity and mobilization among journalists in support of freedom of speech and professional standards.

Independence and effectiveness of the media authority is the only one of all MPM2020 indicators, which scores low risk (27%), albeit half of the variables within the indicator point to medium risk. Two of the members of the Council for Electronic Media (CEM), the regulatory authority, are appointed by the President and the other three are elected by the Parliament. Genuine citizen participation in nominating CEM members is not guaranteed. Thus, the very constitution of the CEM is inevitably exposed to risks of political influences. The duties and responsibilities of the CEM are clearly defined by the law, and the authority has been transparent about its activities. One of the principal tasks of the body is to select and dismiss directors general of the PSM. Recent controversial decisions of the CEM regarding the directors general of the Bulgarian National Radio (BNR) and the Bulgarian National Television (BNT) have led to suspicions of dependence on external factors and to the observation that the authority is not attributed with adequate mechanisms to safeguard the independence of the public-service broadcasters.

The indicator on the **universal reach of traditional media and access to the internet** points to medium risk (58%). Data on both the reach of public TV and radio channels (96% of the population) and the penetration of broadband internet (less than 76% of 30MBps) indicate low levels and therefore high risks based on EU-relevant standards.

3.2. Market Plurality (78% - high risk)

The Market Plurality indicators examine the existence and effectiveness of provisions on transparency of media ownership and the existence and effectiveness of regulation or self-regulation against commercial & owner influence on editorial content. In addition, they assess the risks related to market concentration in the production as well as in distribution of news: as for production, considering separately horizontal concentration in each sector and cross-media concentration; as for distribution, assessing the role of online platforms as gateways to news, the concentration of online advertising market, and the role of competition enforcement and regulatory safeguards in protecting information pluralism. Moreover, they seek to evaluate the viability of the news media market.



The **Market Plurality** domain is the highest risk area for Bulgaria, with three indicators scoring extremely high levels

of risk (90% or above).

Only one indicator scores medium risk: **transparency of media ownership** (35%). There are legal provisions requiring disclosure of ownership details, including the ultimate owner, of all media service providers. In practice though, many outlets do not comply with the law and even the available information is not always easily accessible to the public. Although the law envisages sanctions in case of non-compliance with the transparency obligations, such sanctions have never been imposed.

The regulation and status of **news media concentration** indicate high risk (90%). Above all, there are no specific thresholds based on objective criteria in order to prevent a high degree of horizontal or cross-media concentration of ownership in the news media sector. There are general rules in the competition law, which are not specified for the media sector. Another serious issue is the lack of basic data necessary for the assessment of the actual level of concentration. This is considered a risk in itself. There are no data on the market shares based on total revenues (including advertising, sales, public funding, subscriptions, etc.) generated in the audio visual, radio and the newspaper markets. The online media sector is also characterized by a lack of precise data. Based on partial advertising revenue information, the figures indicate high levels of concentration in the TV sector (90% total market share of the major 4 owners). The sums of the audience shares of top 4 TV media groups (74%) and the top 4 radio groups (78%) are also indicative of high concentration.

The indicator **Online platforms concentration and competition enforcement** reaches the highest possible level of risk (97%). In the first place, the lack of precise market data makes it impossible to conduct an accurate assessment of the level of concentration. Second, there is no sector-specific competition regulation in order to prevent a high degree of market and advertising concentration. Another risk factor refers to the way people access news online – it is rather side-door than direct, 71% of the internet users in Bulgaria accessing news online via social media as opposed to going directly to the website of the news media publisher. Also, there are no provisions ensuring that state funds are granted to the PSM in a proportionate manner regarding their role in the digital environment.

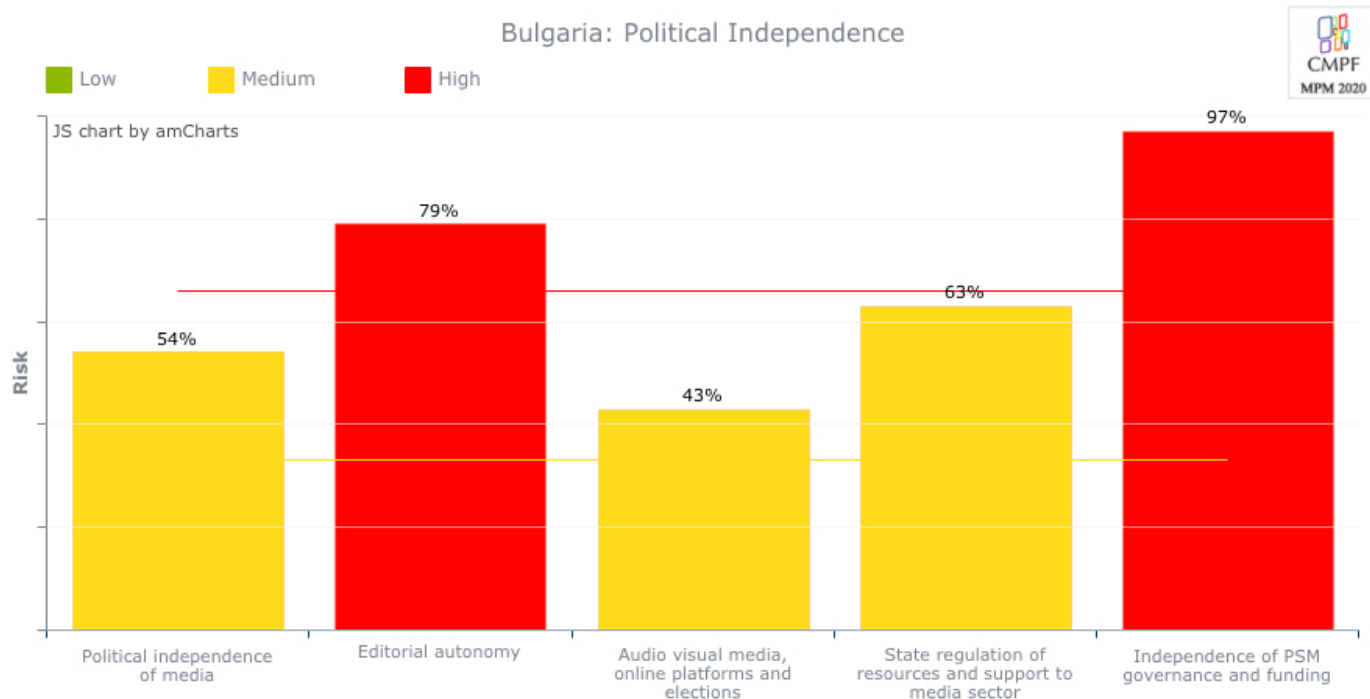
The risk regarding **media viability** is evaluated as high (77%). Although the expenditures for advertising (both offline and online) have increased over the past two years, the overall revenues in the television and newspaper sectors have decreased, while revenues in the radio sector have remained at the same level. Revenues of the local media have dramatically decreased and in fact local media barely survive, as assessed by media professionals. Against this background, there are no public support schemes for the news media sector in particular. Alternative instruments to finance news production have been only partially adopted by some media, the companies developing mechanisms to survive rather than making profits of new business models.

Commercial and owner influence over editorial content scores a very high level of risk (90%). There are no mechanisms granting social protection to journalists in case of changes of ownership or editorial line. Neither are there any regulatory or self-regulatory safeguards against commercial influence over decisions regarding appointments and dismissals of editors-in-chief. In 2019, one of the leading private broadcasters, Nova TV, was acquired by local businessmen Kiril Domuschiev and Georgi Domuschiev. After the change of ownership, the media company ended the labour contracts of a number of journalists, thus depriving them of social protection. Media publications point to the fact that in the aftermath of the acquisition, ‘many of the news staff of the network either quit or were let go’ in ‘what looks like a crude cleansing’ of the media. (Mediapool 2019). In practice, many news outlets and their editorial policy are heavily influenced by commercial interests. Monitoring reports have repeatedly commented on the fact that journalists practice self-censorship due to corporate pressure. Journalistic and advertising content are often intertwined.

3.3. Political Independence (67% - 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 concerns 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 the **Political Independence** of the media scores a medium risk of 54%. A specific feature of the Bulgarian media sphere is the fact that media ownership by politicians and parties, including of audio visual media, is not explicitly prohibited or limited by law. In 2019, the number of TV channels directly affiliated to political parties increased to three with Bulgaria's main opposition party, BSP, launching its own TV station, BSTV. In practice, national and local media from all sectors are subject to systematic political control in their work. The levels of risks in the TV and radio sectors have increased, compared to results of previous editions of the MPM, due to recent controversial developments affecting leading media such as the public-service BNT and BNR and the private Nova TV. The majority of the leading newspapers in the country follow editorial policy in favour of the government.

Accordingly, the indicator on **Editorial autonomy** scores high risk (79%). There are no regulatory safeguards for editorial autonomy in cases of appointments and dismissals of editors-in-chief. Self-regulatory measures stipulating editorial independence from political interference in the news media are not effectively implemented. Practices of politicians pressuring journalists are among the most troublesome issues in the media environment in the country.

The assessment on **Audio visual media, online platforms and elections** indicates medium risk (43%). When covering election campaigns, the PSM and the leading private broadcasters generally adhere to the principles of objectivity and pluralism in accordance with the existing legal requirements. Small TV channels, though, are not always balanced, one-sided political coverage being observed during the 2019 elections for European Parliament. A monitored negative tendency relates to the representation of political viewpoints in news and informative programmes of the Bulgarian National Television (in non-campaign periods), some recent assessments pointing to pro-governmental coverage. The monitoring also identifies some deficits and risks regarding equal opportunities and transparency of online political campaigning.

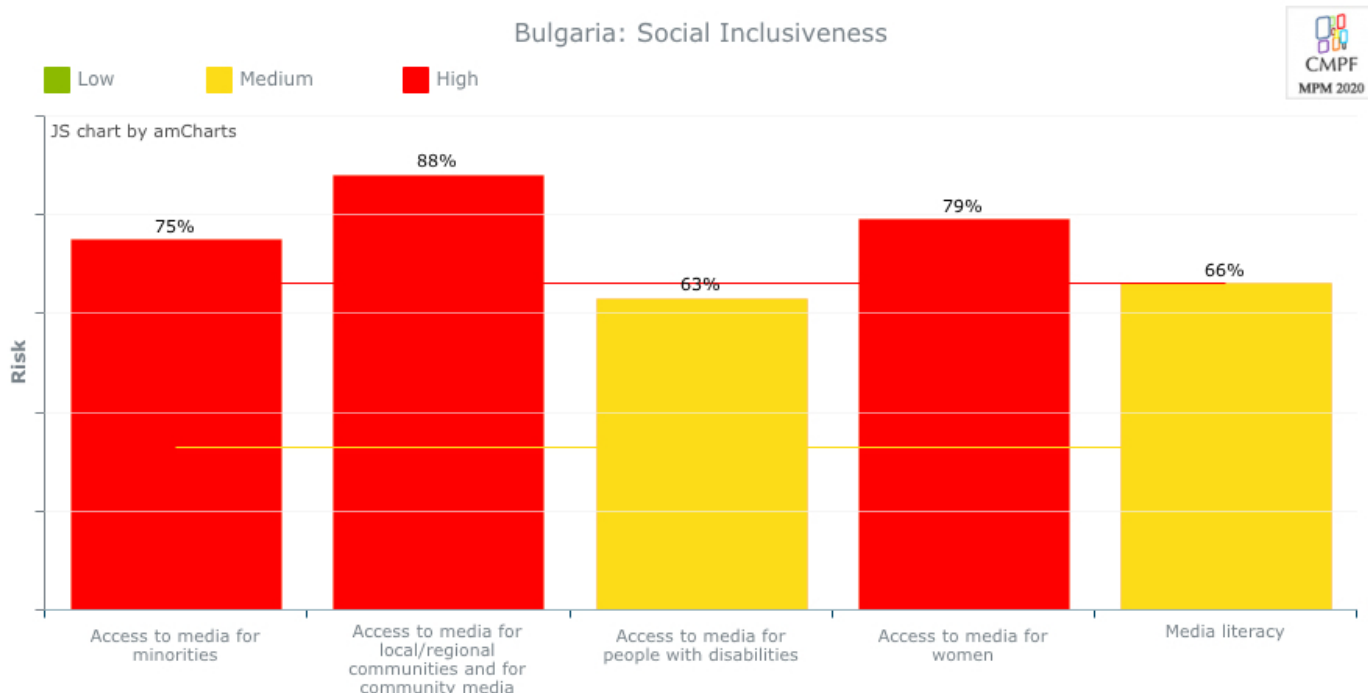
The indicator **State regulation of resources and support to media sector** scores medium risk (63%). Most importantly, there are no regulatory safeguards for fair and transparent distribution of state advertising that prevent preferential treatment and/or misconduct. Neither is distribution of such advertising expenditure based on clear and non-discriminatory criteria in practice. Instead, state advertising distribution remains a tool for influencing editorial policies.

The **Independence of PSM governance and funding** indicator reaches the highest possible level of risk (97%). The formal legal procedures for appointment of directors general and management boards of the PSM do not provide

adequate guarantees for independence from government or other political influence. The appointment of the current Director General of the BNT, Emil Koshlukov, has triggered strong critical reactions by experts and professional organizations due to his previous engagements in politics and controversial experience with politically controlled media. In 2019, a sign of political dependence of the BNR Board of Directors and then Director General Svetoslav Kostov was the unprecedented decision to stop the broadcasting of the BNR Horizon program service after suspension of the leading BNR journalist Silvia Velikova. (RSF 2019b). In addition, funding of the PSM remains problematic. Since 1998, BNT and BNR have been funded via a state budget subsidy, defined year-on-year in the respective annual State Budget Act, and a very limited amount of advertising. The amount of the state subsidy is decided without public discussion, based on a ‘per hour of programming’ principle, and not in line with the remit of the PSM (according to the requirements of EU state aid law).

3.4. Social Inclusiveness (74% - high risk)

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



Access to media for minorities is at high risk (75%). Bulgarian legislation provides broad formulations of anti-discriminatory matters without defining or recognising any ‘national minorities’. The public BNT and BNR are commonly inclined to cover minority-related events and to provide airtime to minority representatives. However, there is a lack of special media policy dedicated to minorities as well as a lack of clear principle of proportionality between the access to airtime and the size of the minority population. As a whole, the cultural and minority diversity in the country is not fully and sufficiently covered by the PSM. Leading private TV channels provide frequent coverage of Roma-related issues but representation usually reinforces negative prejudices.

The indicator on **Access to media for local/regional communities and for community media** also identifies high

risks to media pluralism (88%). Bulgarian legislation does not provide for reservation of frequencies or must-carry rules for regional and local media. The state does not support local and regional media through subsidies or other policy measures. Community media are not envisaged in law.

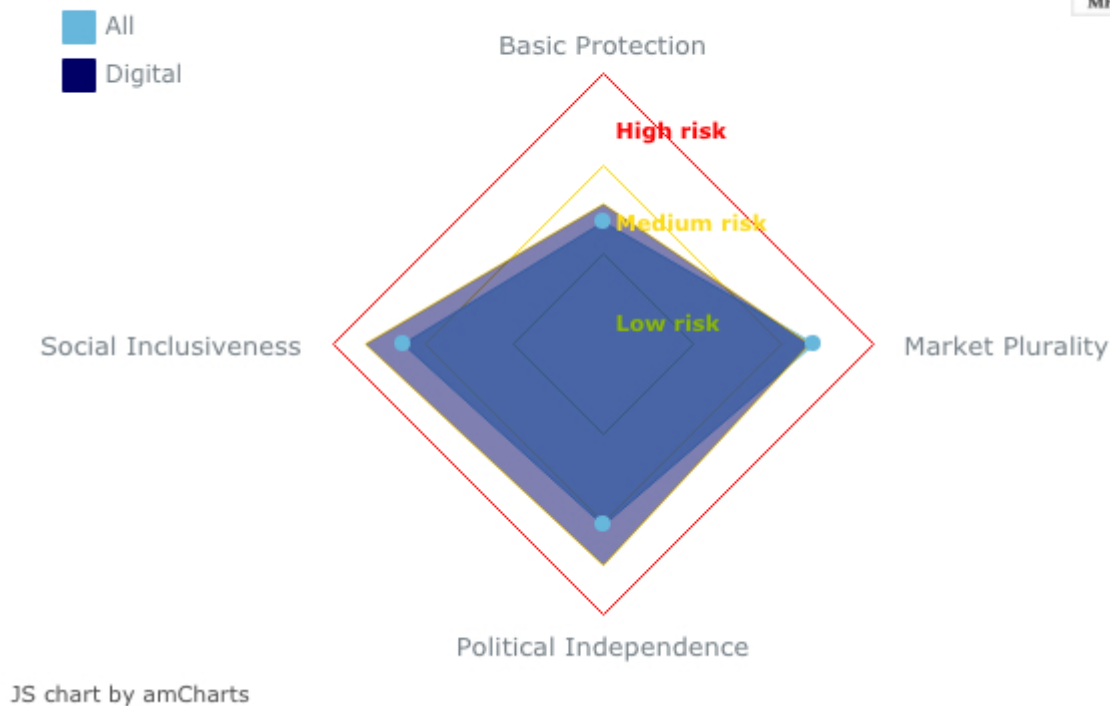
The level of risk regarding the **Access to media for people with disabilities** is medium (63%). Policymaking in promoting access to media content and services to people with disabilities is still fragmented and underdeveloped. The Radio and Television Act includes only encouraging and not obligatory provisions in this regard. It is only the public broadcaster BNT that offers media content adapted for people with hearing impairments on a regular basis, albeit such content does not cover the information needs of this target group. As a whole, access to television content for people with hearing disabilities is very limited. None of the media in the country offers audio descriptions for blind people.

Against the background of a widespread feminisation of the journalistic profession in the country, **Access to media for women** is problematic (79%, high risk). The PSM do not have any specific gender equality policy. The share of women among members of management boards in the PSM is 30%, in the leading private TV companies – 20%, among editors-in-chief in the leading news media in the country – 25%. Representation of women in news and current affairs broadcasting content is mixed. Although there may not be intentional discrimination, women are sometimes underrepresented, portrayed in a stereotyped way or subject to sexism. Male experts and politicians are commonly more often invited by the mainstream media to comment on political matters than female experts. The percentage of women trained for (and employed in) jobs with specialist ICT skills is 41%.

The **Media literacy** indicator scores medium risk (66%) and actually identifies some progress regarding media literacy developments in the country. A national media literacy strategy is being developed by the Ministry of Education and Science. The Ministry is working to integrate digital media literacy into the daily work of teachers by updating material facilities. Media literacy classes are scheduled for the first time in the 2018/2019 school year, but only in a limited number of schools and on an experimental basis. Media literacy is still not present in the compulsory primary or high school education curriculum. Non-formal education on the matter has been maintained on a project-by-project basis by civil society organisations.

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

Bulgaria: Media Pluralism Risk Areas - Digital



Basic protection

The Bulgarian Constitution provides that every person has the right to freedom of expression which also implies to freedom of expression online. There is no systematic practice of filtering, blocking or removing online content in an arbitrary way by the state. However, there is a deficit of guarantees against secret surveillance and illegal information gathering.

Similar to the problems in the media sphere as a whole, online journalism is not protected against censorship and violations of freedom of speech. Attacks and threats to the digital safety of journalists in Bulgaria take place, which is assessed as a high risk. Most vulnerable are critical and investigative journalists. Online harassment to media professionals and pressure over journalists for publications and statements online has increased in the past few years. There are already law cases against journalists for posting critical information on Facebook.

Legislation on data protection does not impose any serious restrictions in terms of journalism. Following Art. 85 of GDPR, Bulgaria has introduced exemptions for journalism in the Personal Data Protection Act. There was initial criticism by journalists and watchdog organizations that the provisions introduced too broad criteria, which could be used as an instrument for censorship. The Constitutional Court subsequently declared the questionable criteria as unconstitutional. The current normative framework does not create legal obstacles for courts and journalists themselves to make a fair assessment of the balance of data protection, freedom of expression and information rights in their practice.

The online media have been developing in a context of wide internet penetration but still below the EU average with regard to broadband coverage, broadband subscription and internet connection speed. The ISP market is characterized by a high level of concentration.

Regulatory safeguards regarding net neutrality in Bulgaria are present and implemented in practice. ISPs manage network traffic in a transparent, impartial and neutral way.

Market plurality

Digital news media, as media service providers in general (excluding personal blogs and social media platforms), are required to disclose ownership details. Nevertheless, transparency of ultimate ownership is not always guaranteed in

practice. A significant number of online news media do not comply with the legal obligations to disclose their ownership to the public. The lack of sufficient ownership transparency in the online media sector has been considered a serious issue by experts and media professionals.

As commented with regard to the indicator Online platforms concentration and competition enforcement, a significant problem, which impedes the precise evaluation of the online media market and its level of concentration, is the lack of data. There is still no available information (or a public register) on the size of the market as well as on the exact revenue shares of the individual media companies. Thus, it is impossible to compare the revenues (including subscriptions, membership, donations, advertising, public funding). The lack of data is by itself a serious risk to media pluralism in general, the online media market deficiencies being among the most serious issues identified in the MPM2020.

The lack of data also affects the assessment of the viability of the online media market. Neither the dynamics of overall revenues nor the number of employed journalists in the sector could be measured and evaluated. On the other hand, available data on online advertising expenditures indicate an increase in the total net revenues which go to online news media.

There are no public support schemes for online media in the country. There is also no taxation of digital services or other regulatory incentives aiming to avoid unfair competition between different players in the digital ecosystem of media.

Although there are some self-regulatory measures stipulating that the exercise of the journalistic profession is incompatible with activities in the field of advertising, with no exceptions for the online media, in practice such measures are not sufficiently effective. There are no safeguards against disguised advertisements online. Media owners and other commercial entities systematically influence the editorial content of news sites. Thus, the online media market is not isolated from the problems typical of the media field in general.

Political independence

Political control over the leading digital native media is difficult to prove. One of the popular news sites, Blitz.bg, has been associated with MP Delyan Peevski. In the last few years, it has been repeatedly claimed by experts and media professionals that the site, albeit not officially owned by MP Delyan Peevski, is in practice under his control. Monitoring of the news content of the outlet indicates a highly positive coverage of Mr. Peevski.

Regulation of online political advertising during electoral campaigns covers online news media but excludes social media and search engines. That is why equal opportunities and transparency of online political advertising is not fully guaranteed. In the 2019 local election campaign, there were some issues with Facebook's transparency policies on political advertising and not all spendings of the candidates could be easily accessed. In addition, state authorities do not undertake sufficient efforts in monitoring the use of personal data on individuals by political parties.

Social Inclusiveness

The low levels of digital competencies among the population in Bulgaria expand the risks to media literacy and to media pluralism as a whole. Only 29% of the population has basic or above basic overall digital skills, while 38% have low overall digital skills. Both figures indicate higher risks than the EU average.

Against this background, efforts to remove hate speech towards ethnic or religious minorities on social media have not been very effective. Ethnicity-based hate speech is still common on social media and often re-published by news sites.

As for hate speech towards people with disabilities, it is sometimes observed on social media, although people with disabilities are not among the common targets of hate speech in Bulgaria.

Gender-based hate speech, on its turn, is widespread. Since 2018, there has been an escalation of misogynist, homophobic and transphobic online discourse in a heated campaign against the ratification of the Council of Europe Convention for Prevention and Combating of Violence against Women and Domestic Violence. Women rights activists have been exposed to serious hate speech, including rape and death threats, on their social network profiles – both in public and private messages.

Almost all media literacy educational initiatives are designed to prevent or counteract hate speech, fake news and other similar practices online. At the same time, such initiatives are still of limited scope and are implemented mainly in the field of non-formal education.

5. Conclusions

The results of the MPM2020 indicate significant risks to media pluralism in Bulgaria. There is a noticeable risk in three of the four areas: Market Plurality (78%), Social Inclusiveness (74%) and Political Independence (67%). Basic Protection area is at a medium level of risk (45%). The trends point towards a deterioration in the overall risk to media pluralism in the country.

The highest individual levels of risks are identified with regard to independence of PSM governance and funding, online platforms concentration and competition enforcement, commercial and owners' influence over editorial content, and news media concentration. There is a significant reduction in risk in the area of media literacy (66%). This is due to a series of effective NGO initiatives.

Against this background, decreasing the risks to media pluralism in many spheres is a matter of urgency in the country.

In the Basic Protection area, fostering positive developments could be achieved through policy measures such as:

- Promotion of campaigns for better professional protection and working conditions of journalists (by NGOs, professional organizations, media stakeholders).
- Improvement of legislation on the composition, functions and effectiveness of the Council for Electronic Media, the national media authority, by introducing the effective measures for independence in compliance with the Directive (EU) 2018/1808.

In the area of Market Plurality:

- Introduction of media pluralism criteria and sector-specific concentration thresholds in cases of media mergers (in the law and in the competencies of the regulatory authorities).
- Constant and sustainable monitoring of advertisers' and media owners' influence over editorial content (both offline and online) – to be conducted by NGOs in order to help prevent commercial interference.

In the area of Political Independence:

- Reassessment of the Radio and Television Act regarding PSM independence, funding and management, following the requirements of EC Communication on State aid in electronic media.
- Effective support for measures to enhance editorial independence (by NGOs and professional journalistic organizations).

In the Social Inclusiveness area:

- The existing program service BNT2 to be aligned with a public television mission and be dedicated to culture, with a solid focus on minority, gender and social issues.
- Increasing the access to media content for people with disabilities by setting long-term and short-term targets for subtitling, signing and audio description.
- Introduction of policy measures to support regional and local media with regard to their financial sustainability, distribution, political and economic independence (by the government, local authorities, NGOs).

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

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Orlin	Spasov		Foundation Media Democracy / Sofia University "St. Kliment Ohridski"	X
Nelly	Ognyanova	Professor	Sofia University "St. Kliment Ohridski"	
Nikoleta	Daskalova	Researcher	Foundation Media Democracy	

ANNEXE II. GROUP OF EXPERTS

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

First name	Last name	Position	Institution
Vesela	Vatseva	Executive Director	Bulgarian Association of Regional Media
Petranka	Fileva	Professor	Sofia University "St. Kliment Ohridski"
Maria	Cheresheva	Vice Chairman	Association of European Journalists – Bulgaria
Pavel	Antonov	Managing Editor, Co-Founder and Member of the Board	BlueLink
Anna	Tanova	Executive Director	Association of Bulgarian Broadcasters - ABBRO
Emilia	Staneva	Director of Licensing and Registration Directorate	Council for Electronic Media
Kapka	Panayotova	Director	Center for Independent Living

