



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: Cyprus

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TABLE OF CONTENT

1.	About the project	5
1.1.	Overview of the project	5
1.2.	Methodological note	5
2.	Introduction	7
3.	Results from the data collection: assessment of the risks to media pluralism	8
3.1.	Basic protection (37% - medium risk)	9
3.2.	Market plurality (74% - high risk)	10
3.3.	Political independence (59% - medium risk)	11
3.4.	Social inclusiveness (83% - high risk)	13
4.	Pluralism in the online environment: assessment of the risks	15
5.	Conclusions	17
6.	References	18

Annexe 1. Country Team

Annexe 2. Group of Experts

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

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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 Cyprus the CMPF partnered with Christophoros Christophorou (Independent expert), Nicholas Karides (Ampersand), 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 Annex 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

Cyprus has an area of 9,251 square kilometres with a *de jure* population of 875,900 (2018) of which about 18% are non-Cypriots. The official languages are Greek and Turkish. The 1960 Constitution of the Republic of Cyprus recognises two power-sharing communities, the Greek and the Turkish communities. These live segregated since the collapse of the bi-communal arrangement in 1964 and the 1974 Turkish invasion that has since *de facto* divided the island. Many rounds of negotiations under the auspices of the United Nations aiming to end the division have so far proved unproductive.

Armenians, Maronites and Latins are recognised as religious groups. They were given the option in 1960 to 'join' either one of the two communities and they chose the Greek community. They constitute around 1.3% of the Greek Cypriot community. Other-EU and non-EU citizens represent 12.5% and 8,6% of the employed labour respectively (2019).

The economy has been recording steady growth rates (3.2% in 2019) since the country's early exit in 2016 from a EC-ECB-IMF bail-out programme. Put in place in 2013, the programme helped Cyprus face a severe economic crisis that had excluded the country from the international markets. Tourism, financial services and more recently a construction boom are the key contributors to the economy.

Until recently strong trade unions and a clear left-right polarization had dominated social and political life. This gradually began to change after the rejection of a UN settlement plan of the Cyprus Problem and Cyprus' membership to the EU in 2004. Since then, an unprecedented level of political alienation of citizens has been evident, with abstention rates reaching 33.5% in the 2016 parliamentary elections and 55% in the 2019 European Parliament elections.

The media landscape in 2019 featured a continuing shift towards online media with a gradual decline of the written press (GNORA 2019). Available data show total readership of the dailies to slightly recovering to 12.3% (from 11.5% in 2017) on weekdays and a marginal drop to 17.2% from 18% on Sundays. However, these data are based on 'readership' surveys and do not reflect audited circulation numbers.

Equally, statistics on online media reflect a strong shift towards legacy media web content and a considerable increase in digital native media (COPA 2019). They also show an increasing trend of social media directed visits towards online content.

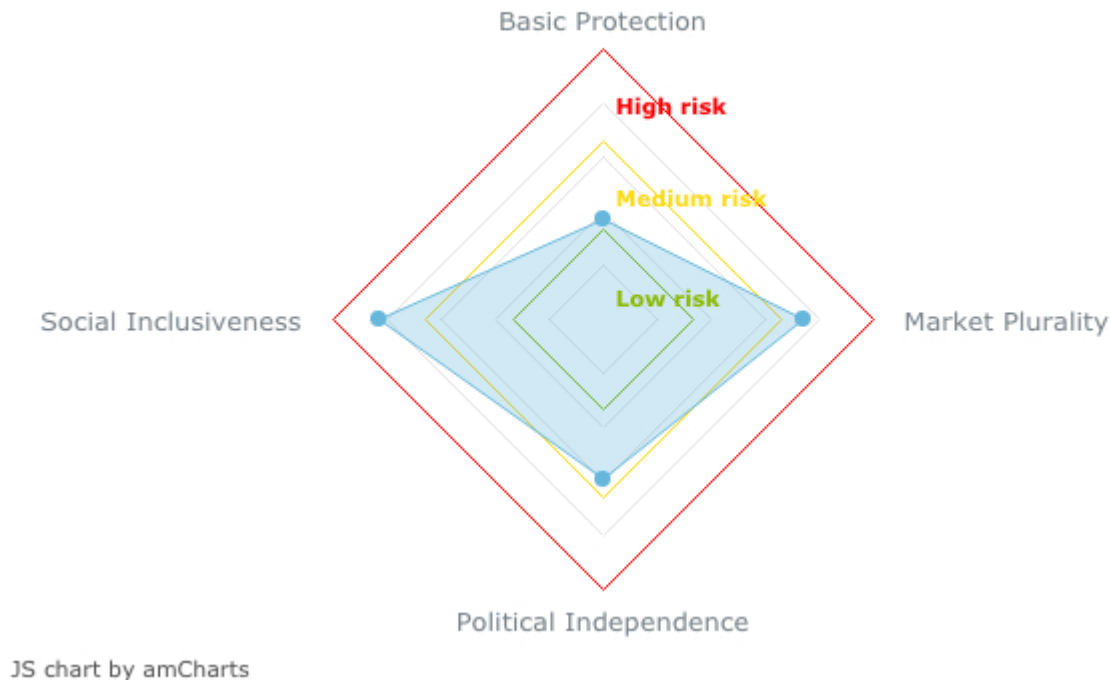
Television continues to be the main medium from which people get their news (Eurobarometer EB92, 2019). ANT-1 TV and Alpha TV top market share (with 13.8% and 13.6% respectively) but competition with SIGMA TV, OMEGA and the PSM RIK [CyBC] (with two channels) remains strong. This is also reflected in the main evening news bulletins audience share, which is spread almost equally among them. The PSM CyBC1 was marginally ahead in the third quarter of 2019 but all channels were hovering between 13 and 15% (GNORA 2019).

In the first half of 2019 broadband penetration approached 90% as it gained a 2.9% increase compared to 2018, with IPTV and cable TV also on the rise. The key players in the Internet, IPTV/Cable TV and telephony market remain the same with Cyprus Telecom, CYTA, at 62.2% in the second quarter of 2019 followed by Cablenet (24.2%), Primetel (13.2%) and the newcomer to the market EPIC at 0.5% (OCECPR 2019).

The media regulatory framework for both the commercial media and the PSM remains unchanged since the mid-2011 transition to digital television (Iris Merlin 2019). Some amendments in April 2019 were insubstantial, not sufficient enough to respond to the regulatory needs of the new digital and online environment.

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

Cyprus: Media Pluralism Risk Areas



The state of media pluralism in Cyprus appears to have deteriorated considerably since the last report of 2017. All sectional criteria appear with increased risk figures – mainly due to the lack of data and the fact that the regulatory framework has not been adapted to the changing media landscape. However, some changes and new issues addressed in the MPM2020 questionnaire, may have affected comparability with the MPM2017.

The risk to **Basic Protection** in Cyprus has increased slightly from 29% in 2017 up to 37%, entering the lower end of the medium risk from the low risk area. Still, in terms of basic protection constitutional and legal provisions, and the application of the ECHR case-law by courts continue to offer citizens safeguards and effective protection of their rights connected to freedom of expression. Issues of concern are the existing digital underdevelopment and the relatively limited penetration and low speed of broadband. In addition, the right to access to information is curbed by a further delay in the implementation of a law voted in 2017.

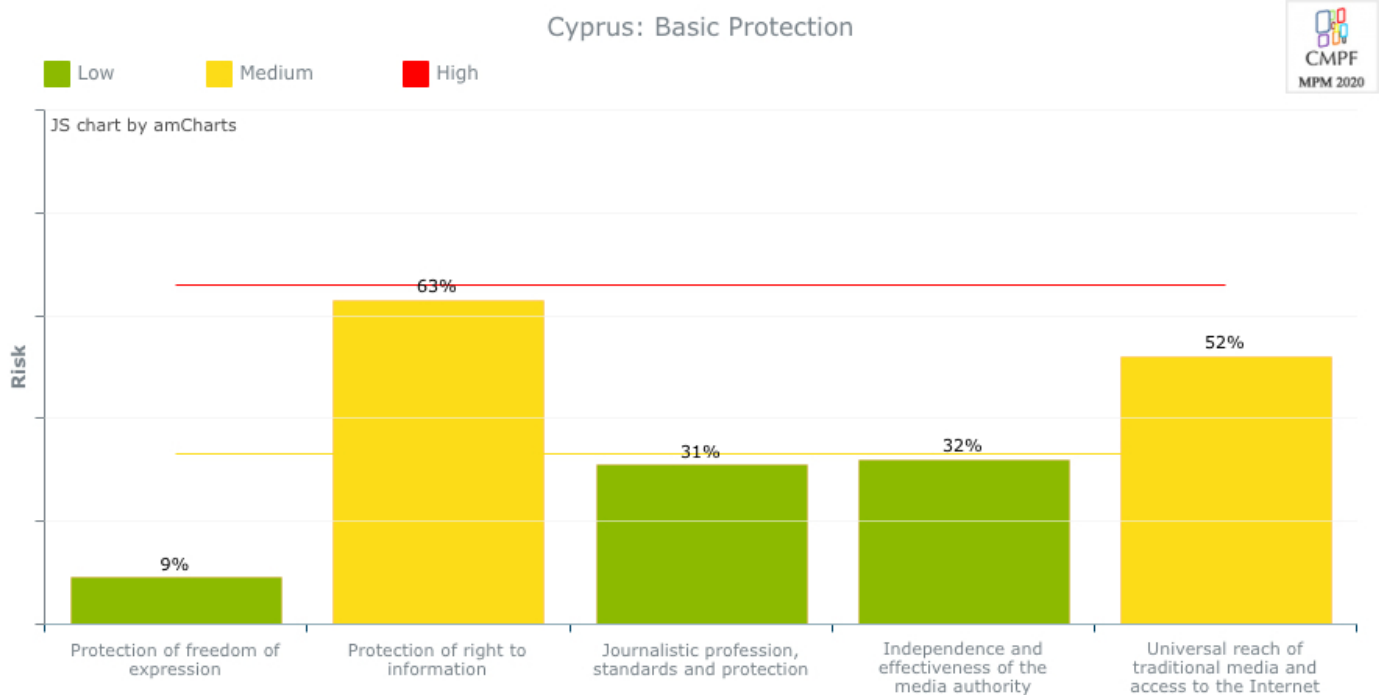
The overall risk rating for **Market Plurality** has doubled since 2017 jumping to high risk at 74% from the 36% that was in the lower end of medium risk. Law enforcement ensures a relative transparency in media ownership and avoidance of cross media concentrations but only in broadcasting. The absence of obligation for ownership transparency in the written press and digital sectors remains a threat. In addition, the lack of reliable data, the absence of a digital media legal framework as well as the increased corporate influence in media and pressures on journalists' employment conditions have also contributed the increased risk.

The risk to **Political Independence** has increased from 45% in 2017 to 59%, still within the boundaries of medium risk. Media coverage of elections is fair and there is extensive media access by political actors. Despite strong democratic credentials and fair election processes in Cyprus, political interference in the media is also strong. The PSM, in particular, its governance, its funding and operation, still suffer from sustained political interference.

The risk to **Social Inclusiveness** has also shown an increase and remains entrenched in the high risk boundary at 83% up from the 70% recorded in 2017. Access to the media is mostly reserved to mainstream groups side-lining communities, minorities, women and other social actors in a societal context of plurality and multiculturalism. Media literacy actions are limited and lack policy direction despite efforts deployed by various stakeholders.

3.1. Basic Protection (37% - 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 risk to **Basic Protection** of the freedom of expression in Cyprus has increased slightly to 37% entering the lower end of the medium risk parameter from the low risk it had recorded in 2017 (29%).

Constitutional and Regulatory safeguards exist and remain effective. Cyprus is a signatory to all relevant European and international legal instruments and there has been no evidence of violations in the period covered by this report.

Even though as yet there is no regulatory framework in place for online media, aspects relating to **Protection of freedom of expression** are dealt with by the existing framework. There has not been any state interference in terms of filtering or removing content in an arbitrary manner and individuals do have access to effective legal remedies in the event that state or non state violations occur.

Cyprus is among the few EU countries that have decriminalised defamation, even though the Attorney General can authorise criminal prosecution in very specific cases.

Regarding restrictions to the right to information, these are defined in accordance with international standards but appeal mechanisms for denials to access both on Court and Ombudsman level are slow and thus cannot be considered fully satisfactory. A law on Freedom of Information was voted in 2017 aiming to resolve the problem but it has since not come into force with a new promulgation date set for 2020. In the meantime, citizens, including journalists are facing a situation where their requests for information are dealt by the administration with contradictory policies or a lack of response. There has also not been any development on the establishment of a regulatory framework to protect whistleblowers and the risk for **Protection of right to information** has therefore been elevated to the high end of medium risk at 63%.

Access to and exercise of journalism are not hindered by any obstacles and Cyprus rates low risk (31%) in the indicator on **Journalistic profession, standards and protection**. However, despite the Cyprus Union of Journalists being active and respected, it is not able to effectively protect journalists' rights and benefits nor to guarantee editorial independence

and the respect for professional standards. Shrinking revenues and the shake up of the news media sector resulting from the online tech shift have brought pressures on journalists, in terms of professional standards, their remuneration, but also in terms of a growing sense of self censorship as well as direct interference in their editorial work. Journalists continue to face employment uncertainty and the risk of dismissal mostly for financial reasons.

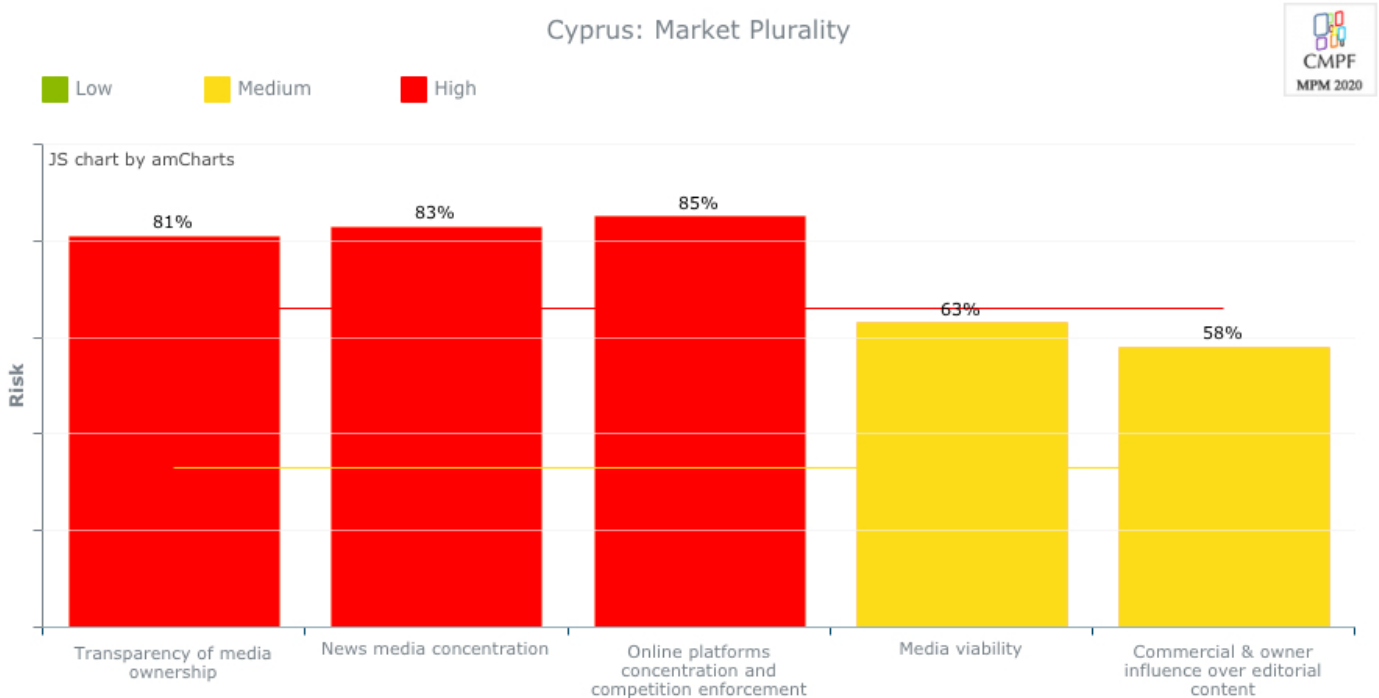
Though rare there have been some threats and attacks to the physical safety of journalists. There is no available data that can conclusively preclude and measure threats to the digital safety of journalists and in this context the absence of such data is deemed as a high risk. The regulatory safeguards for the protection of journalistic sources are recognized while the necessary derogations provided for by the GDPR ensure journalistic protection.

The media regulatory system ensures a legally independent authority with its own budget and adequate powers to conduct its mandate. Its decisions are published regularly and are subject to judicial review only, with no room for government interference. The overall assessment for **Independence and effectiveness of media authority** points to a low risk at 32%, although other parameters are considered as posing medium risks. Such is the case of the appointment of members by the government in terms of deficient selection criteria, doubts about independent/efficient operation in practice, transparency and accountability issues.

86% of households in Cyprus have broadband connection (2018, up to 89.4 in 2019) but internet speeds average is low (11Mbps), falling in world rankings to number 64 in 2019 from 59 in 2018. Problems with access to online and digital development point to an overall medium risk at 52% for **Universal reach of traditional media and access to the Internet**, despite universal coverage of radio and television.

3.2. Market Plurality (74% - 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.



Market Plurality has deteriorated considerably since the 2017 report particularly with two indicators – those of Transparency of media ownership and New media concentration – showing alarming change shifting the rating deep within the high risk range (both above 80%). Media viability remains on the higher end of medium risk (63%). The overall rating for Market plurality has as a consequence doubled since 2017 jumping to high risk at 74% from the 36% that had placed it in medium risk.

With legal obligation of **Transparency of media ownership** only applicable to broadcast media (where efficient implementation of rules remains doubtful), the written press and digital media landscape still remains worryingly nebulous. The very absence of a law specific to digital media contributes to the high risk assessment (81%). In both the written press and digital media it remains difficult to identify and verify ultimate owners or cross ownership.

News media concentration scores 83%. In the audio-visual media sector ownership and control is closely regulated by the Cyprus Radio and Television Authority mostly through the licensing procedure and less through systematic scrutiny. At the same time the fact that four of the seven commercial TV channels and the PSM, are drawing an almost equal share of audiences, manifest a plurality landscape. Surveys indicate that the principle news source is television, followed by internet sites, social media, radio and the press. In the period since the 2017 report the audience share situation has been affected by the strong showing of web streaming services, where the absence of specific regulation affects the overall news media sector, showing a high risk.

Establishing a precise picture of the situation with regard to audience shares and circulations both for newspapers and their internet editions is marred by the absence of independently audited figures. This is further complicated by the side door route of many users when accessing online content in general via, mainly, social media platforms. The online sector remains unregulated and is thriving with various outlets, raising the risk to high level of the indicator on **Online platforms and competition enforcement** at 85%. However, the sector's real role is mitigated by the fact that the news that is put out is derived from very few, indeed often the same, news sources. These outlets are vying mostly for visits and clicks, to the detriment of quality of content.

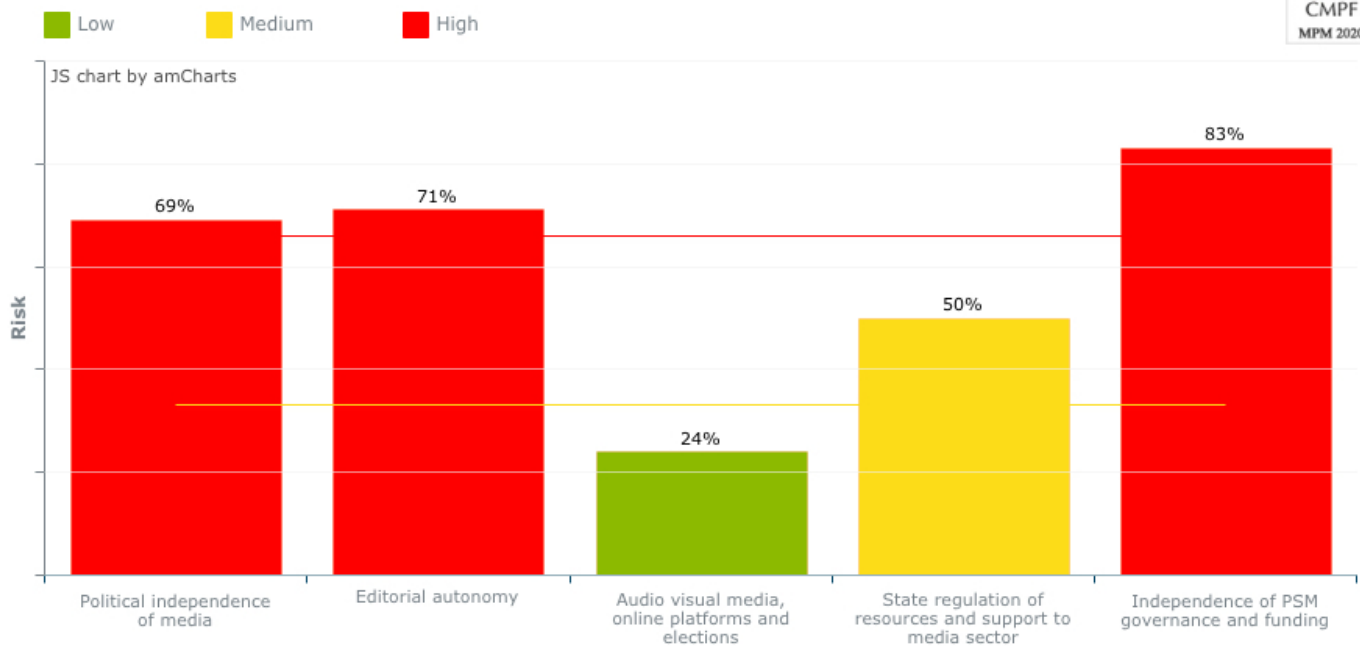
Employment insecurity facing journalists has made professionals more susceptible to owner pressures and reluctant to assert editorial independence. Advertising income for most media has remained stationary with the exception of online where an increase has been recorded. **Media viability** remains a medium risk but on the high end of it at 63% (58% in 2017).

As regards competition the media and advertising market are, as things stand, sufficiently fragmented reducing potential threats. Nonetheless, the scarcity of data and the absence of any legislation on digital media, coupled by the fact that there are no sectoral references in competition law do point to a much higher risk (79%) than the reality on the ground may reflect.

Press and digital news outlets appear heavily depended on corporate sponsorship, an increased presence of embedded content and corporate advertorials. There is also a growing trend of specific corporate news content getting frequent and priority reference and exposure online, often with no distinction between editorial content and advertorials. Under these circumstances the indicator on **Commercial and owner influence over editorial content** is recorded with a sharp increase to Medium Risk at 57%, up from 17% in 2017.

3.3. Political Independence (59% - medium 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 risk to **Political Independence** area has increased to 59% still within the boundaries of medium risk but well above 2017 (45%).

Strict clauses regulating radio and television ensure pluralism in audiovisual media against ownership concentration or control, while also requiring content impartiality. The relevant ownership thresholds and other constraints cover all persons, including politicians, and are efficiently enforced by regulators. However, while parties are excluded, explicit legal exclusion of politicians from ownership and /or control of radio and television, as well as of the various types of media distribution networks only applies to public office holders. This is stipulated in a 2008 law on incompatibilities for persons occupying public offices.

Room for political influence exists in the Cyprus News Agency whose budget relies almost exclusively on state funding. Crucially as a monopoly agency and particularly as the sole provider to online media there's an over-reliance on its output which shapes the news agenda and public opinion and is thus judged as high risk. It is essentially a semi-official state agency and, though it covers with diligence and equal emphasis the activities of the entire range of political parties, it remains in its focus and nuancing accommodating to the government of the day. The above situation poses a high risk (69%) for the indicator **Political independence of media**.

Editorial independence is in principle warranted by both regulatory and self-regulatory provisions. However, the rules make very limited provisions for mechanisms or procedures for the effective protection of journalists and avoidance of political interference with their work. While no rules exist with regard to the appointment or dismissal of editors in chief, the key issue remains the pursuit of the political agendas of media owners - sometimes without any visible interference – and often led by corporate rather than actual political aims. This enforces a degree of self-censorship and compliance among editorial staff. On top of this there's a subculture of informal relations between the political class and media owners and journalists which often more than any other factor continues to affect focus, selections and nuancing. The revised rating for this indicator places it at just within the high risk range at 71% up from the 38% recorded in 2017.

During election processes access for political actors, parties and politicians is open, fair and non-discriminatory though small or marginal political and social groupings often complain of bias. Both PSM and commercial media are legally bound to cover daily political communication and electoral campaigns alike. Equal opportunities apply to political advertising that has to be clearly identified as such. Matters are less clear when it comes to online platforms and advertising, in terms of the transparency of both sources and labelling. The specific risk for the indicator on **Audiovisual media, online platforms and elections** remains low, though it increased from 8% to 24%.

The Radio spectrum was until 2016 the only state resource allocated in a transparent and fair manner. Two

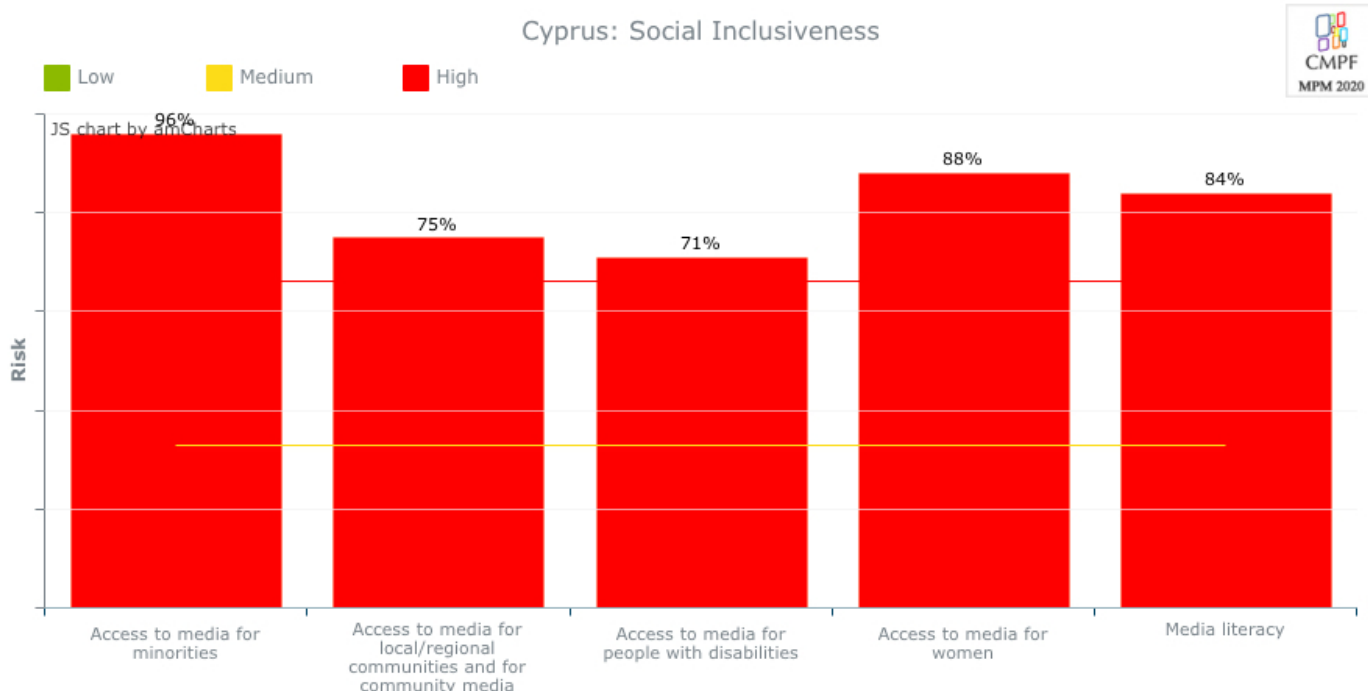
extraordinary schemes of direct support to media that were introduced in 2017 are suffering from limited transparency or selection criteria. Risks to the survival of traditional media, affected by both the economic crisis and competition by new media have not been curbed. In addition, the absence of rules for the distribution of state advertising, even though it appears to be fairly done in practice, poses also a medium risk. The indicator **State regulation of resources and support to the media sector** remains unchanged at a medium risk (50%).

With regard to the PSM (RIK), the relevant regulation for ensuring access and impartiality vis-a-vis all social actors and groups in general and political groups during election campaigns are implemented efficiently and this area poses a low risk. Though the situation in the private audio-visual sector appears fair the lack of transparency and the absence of reports on election coverage lead us to judge it as medium risk.

As regards the **Independence of PSM governance and funding**, the situation remains compromised and poses obstacles for its smooth functioning and independence. The criteria regulating the appointment of the PSM's Director-General and the composition of its governing board are fairly broad and are exploited by the government and political parties in a sharing-the-spoils attitude at the expense of independent experts participation. Also, the state and the political party system deciding on PSM budgeting allows their strong influence and often blatant interference in its operations. Risks against the PSM's independence have dropped marginally but remain very high, at 83%.

3.4. Social Inclusiveness (83% - 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.



The risk to **Social Inclusiveness** has also shown an increase and remains entrenched in the high risk boundary at 83% up from the 70% recorded in 2017.

Access to media is dominated by the presence of politicians and representatives of strong pressure groups. Given the very limited or even no access for various groups, inclusiveness continues to remain a very problematic area for media pluralism. **Access to media for minorities** in Cyprus is a complex issue with multiple aspects: it refers to small numbers of Cyprus citizens that belong to 'religious groups', as defined in the Constitution, and an inflow of diverse

groups of immigrants into the country, starting in 1990. The PSM law requires that programmes be impartial and respect the interests and sensitivities of minorities, with no further provisions on access or other rights. Programmes addressed to ‘religious groups’ recognised by law, and in other languages, exist on radio but not on television. Rating access to media for minorities remains a very high risk (96%).

Access to media for regional/local communities and for community media is mitigated by the limited geographical size of Cyprus. However, the absence of any legal definition or recognition of community media, keeps inclusiveness risks high despite having dropped marginally from 79% to 75%.

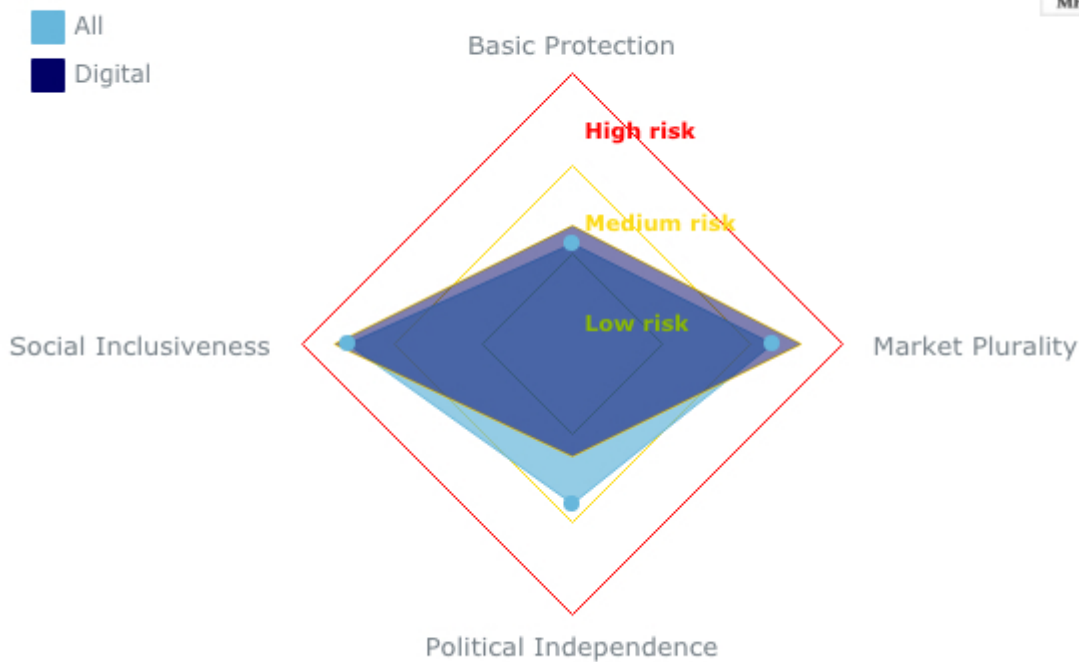
Despite growing social sensitivity and the existence of legislation on **access to media for people with disabilities** the overall situation has not improved with media failing to comply with the relevant legal provisions. This failure, though long overdue has pulled the rating at high risk at 71%, from 50% in 2017.

Promotion of gender equality and respect for women’s rights is the subject of a variety of laws, some very detailed. These are binding for all. However, neither the PSM nor commercial providers have developed any gender equality policy. Moreover, the presence of women in media governing councils or the management remains very low as is the representation of women experts in news and current affairs broadcasting in ways that are proportionate and free from stereotypes. The indicator on **Access to media for women** continues to present a high risk at 88% (79% in 2017).

There is still no media literacy policy framework, which has been pending since 2012, and consequently the matter is not addressed in the education curriculum. Academic and civil society bodies do undertake some initiatives which, however, do not come any close to respond to existing needs. The Cyprus Pedagogical Institute of the Ministry of Education and Culture is active in promoting media literacy activities in the educational system (including training for teachers) but mostly with an emphasis on online safety. Some of the activities are undertaken in collaboration with the Radio Television Authority as the official body responsible for media education but these activities are very limited. There is still a low rate of basic or above basic overall digital usage skills at 50% (up from 43% in 2017). In terms of efforts to counter hate speech the absence of concrete data on cases and how they may be dealt with it remains difficult to assess the situation. The specific **Media literacy** indicator therefore remains high-risk at 84%, higher of the 75% in 2017 due to the new topics evaluated (hate speech).

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

Cyprus: Media Pluralism Risk Areas - Digital



JS chart by amCharts

The overall standing of Cyprus in the MPM evaluation of the online environment depends on crucial factors affecting a range of important indicators. These factors are:

- the absence of a digital legal framework or explicit mention of digital in media laws
- the absence of independently audited data on various aspects and activities related to the online media.

The evaluation per area is as follows.

Basic Protection

Despite the absence of a law for online communication, freedom of expression is covered by the broader protection under the constitution, which also ensures legal remedies in case of violations. No incidents of arbitrary filtering or content removal by the State or ISPs have been made public. The absence of any relevant reports poses an issue of transparency and maybe uncertainty, although if incidents had occurred they would most probably be made public.

With regard to the digital safety of journalists, though no specific incidents took place, our assessment of high risk has been based on the seizure, in late 2019, by the police of a spy van with extensive hacking and surveillance capabilities. The fact that very limited information has been officially made public raises concerns for the digital safety of everybody, including media professionals. On a different level that privacy and data retention obligations, and protection of journalists, the laws adopted by the Republic fully comply with the European Convention of Human Rights and the GDPR.

Broadband coverage and broadband subscription data in this report refer to 2018, pointing to a medium risk. However, 2019 subscription data would place Cyprus in the low risk area. Internet speeds remain well below the EU average, while EU standards on net neutrality and ISP data usage are enforced. There are only four ISPs, which are operating impartially and with transparency. The Basic Protection area in the online environment faces a medium risk of 44%, marginally higher than the overall area risk of 37%.

Market Plurality

The absence of a specific legal framework for online media and of any thresholds and obligation for transparency of ownership - except in broadcasting media - and the lack of audience and other data pose a high risk for

Market Plurality, at 84.6%. This is again higher than the overall risk of this area (74%). Existing laws on oligopolies and monopolies and competition in general are normally applicable to online media and the advertising market. However, explicit reference in the competition laws is made to media alone – not to online or digital, which is considered by the project methodology as problematic.

We equally face a lack of reliable independently audited data on digital native news media – an issue which is a problem for the whole media sector. This constitutes a significant risk as market and audience shares are difficult to establish and assess.

No recent surveys provide data on how people access news and the share of news consumption via social networks and aggregators. Also, no regular surveys take place that could establish exact figures and trends, while the lack of transparency regarding world portals /carriers produce a big gap in any attempt to evaluate the online sector. Market and figures on national online media shed some light, which cannot compensate for the lack of data noted above.

Finally, no audited or verified data on the revenues of digital news media are available. This has prevented a comprehensive and accurate assessment of the market, although unofficial data do point to an increase in advertising revenue, for both online and offline media, but not for all media, since 2017.

Media revenues in general, in the small Cyprus market, remain an issue of concern. Some extraordinary or very specific forms of state assistance to media outlets are not sufficient to warrant an untroubled future for them.

Political Independence

Ownership or control of digital media may only be regulated for politicians in public office, on the basis of the law on incompatibilities, though reference to media is not explicitly mentioning digital.

Beyond the general principles in Codes of conduct, which is signed also by the association of online media, there are no specific guidelines for digital media.

No clauses exist in media or other laws or the Code of Ethics that regulate online advertising and online political activity during or outside election campaigns. While there are rules in place for political parties and candidates to report campaign spending online there gaps and doubts about effective implementation. In contrast the data protection authority does take into account the issue and examines issues related to the use of personal data by politicians and political parties.

Finally, the law on the PSM RIK (CyBC) makes explicit reference to the OSM including in its services Internet and digital services, taking care that the use of funds does not distort competition.

The absence of rules or clauses in the Code of Journalistic Ethics with specific and explicit reference to the use or control of online digital media and some deficiencies in regulating online media use and activities by politicians constitute risks for the Political Independence area. The medium level risks related to reporting spending for online political advertising, some /limited transparency by online platforms and the specific rules on funding the online services of the PSM mitigate the risk for the area to 42%, significantly lower than the overall area risk (59%) but still within the medium risk level.

Social Inclusiveness

Media Literacy activities are very limited in numbers and scope, mainly due to the absence of any policy framework. Digital competencies are placed at the lower end of high risk (towards medium) for the percentage of the population with low digital skills, and the lower end of medium risk (50%) for the percentage with basic of above basic overall digital skills.

While there are laws, specific for fighting hate speech, due to the limited number and scope of media literacy activities, training on hate speech avoidance is inexistent, as are efforts for removal of online hate speech towards women and persons with disabilities.

The Media literacy indicator for online media is high risk (88%), slightly higher than for the entire area (83%).

5. Conclusions

Freedom of expression in Cyprus remains strong and well protected but the risks for media pluralism have increased considerably since 2017. This is mainly due to the lack of adequate action to respond to challenges emerging in the digital environment. Existing limitations in ensuring ownership transparency have increased, and the lack of independently audited data renders the task of regulators harder. The absence of updates makes the under-developed regulatory framework inefficient.

Despite strong democratic credentials and a fair role of the media in election processes, political bias, and political interference in the media compromise their operation. The media appear increasingly vulnerable to influences by commercial interests, while they are prone to reflect the owners' corporate and political agendas. Media literacy actions remain limited, with no policy framework.

New challenges have been added to the already existing ones that need to be addressed in order to improve media pluralism. They are becoming more urgent in the rapidly expanding digital environment:

Basic Protection:

- Authorities must update the regulatory framework and keep pace with the emerging urgent challenges of the digital and online environment. This should guarantee effective ownership transparency covering all media.
- Unionised and non-unionised journalists and all media stakeholders need to reaffirm their role and reclaim their status to regain the public's trust. Promoting quality and excellence in journalism is a major requirement to the above.

Market Plurality:

- The media need to clear content from external influences and redeem their social role.
- Any state scheme to assist the media, all aids and indirect subsidies must be fair and transparent.

Political Independence:

- Government and political parties should revise their approach to media, mainly PSM. Through amending the law and their practices, they should warrant the unhindered operation of an independent in all respects PSM.
- Media professionals should seek ways to strengthening their Union and effectively defending their labour rights. This is the key for journalists to claiming their editorial independence.

Social Inclusiveness:

- The legal frameworks of both the PSM and commercial media need to be revised in order to broaden access by persons and groups. Rules should include the obligation for the adoption of policy frameworks on gender equality and media access by minority groups.
- Community media must find a place in the law, with provisions for implementing a comprehensive policy framework.
- The identified risks against pluralism make media literacy crucial in helping citizens to respond to the many challenges they are facing. The adoption and implementation of a policy framework remain major challenges for the authorities.

6. References

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Christophoros	Christophorou		Independent expert	X
Nicholas	Karides	Ampersand Director	Ampersand	

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
Costas	Stratilatis	Associate Professor	University of Nicosia (UNIC)
Giorgos	Frangos	Chairman	Union of Cyprus Journalists
Antigoni	Themistocleous	Regulator - Officer	Cyprus Radio Television Authority
Marilena	Evangelou	Journalist, Responsible for Web edition, digital content	Politis Daily Newspaper
Eleni	Mavrou	Board of Directors	Dialogos Media Organisation
Marios	Drousiotis	Chairman	Cyprus Consumers Association
Andreas	Frangos	Chairman of the Board of Directors	PSM, Cyprus Broadcasting Corporation - RIK

