



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: Greece

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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 (31% - low risk)	8
3.2.	Market plurality (66% - medium risk)	10
3.3.	Political independence (49% - medium risk)	11
3.4.	Social inclusiveness (66% - medium risk)	12
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

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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 Greece the CMPF partnered with Evangelia Psychogiopoulou, Anna Kandyla (Hellenic Foundation for European and Foreign Policy (ELIAMEP)), 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

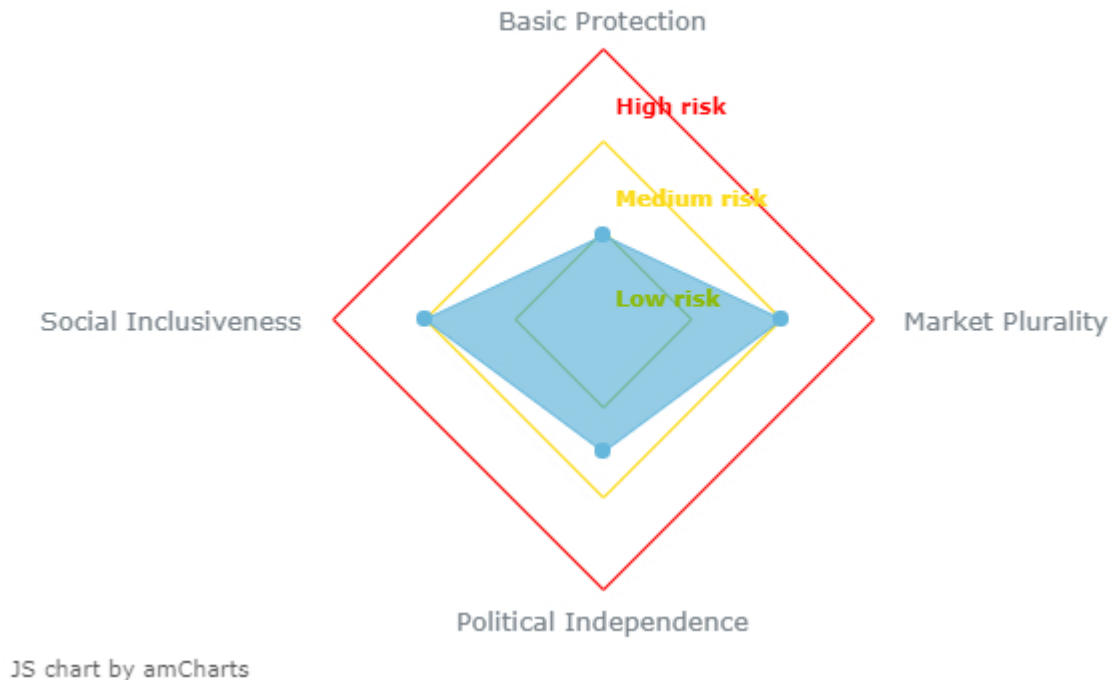
Greece has a population of 10.82 million inhabitants and Greek is the official language. There is one officially recognized minority, which is the religious minority of Western Thrace, with an estimated population of 100,000 persons. The percentage of foreign nationals residing in Greece is 1.8% (from EU Member States) and 6.5% (from third countries) (Hellenic Statistical Authority, 2019).

Greece is recovering from the economic crisis but it is still struggling with the immigration/refugee crisis, from which the way out is uncertain. In terms of politics, the 2019 elections brought the centre-right political party, Nea Dimokratia, in government.

Regarding media consumption, according to the 2017 Eurobarometer survey (88.3), the main source of news on national political matters is audiovisual media (63%), followed by websites/portals (24%), social media/aggregators (6.27%), radio (4%) and newspapers (3%). Free-to-air digital terrestrial television is the main access mode for television services. In addition to private operators, ERT, the public service media (PSM), offers TV, radio and online services. Direct access to news online amounts to 45%. Access to news via intermediaries takes place through social media (25%), newsletters (14%), search engines (12%) and aggregators (4%) (Digital News Report, 2019).

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

Greece: Media Pluralism Risk Areas



The lowest risk for media pluralism is identified in the area of **Basic protection**. All the other areas, namely **Political Independence**, **Market Plurality**, and **Social Inclusiveness**, have a medium risk score, with Market Plurality and Social Inclusiveness being at the border with high risk.

Certain indicators receive a high risk score. More specifically, in the domain of Market plurality (which scores on average a medium risk, but very close to the threshold of high risk), the indicators on **Online platforms concentration and competition enforcement**, **Media viability** and **Commercial and owner influence over editorial content** are identified as high risk. Two out of the five indicators within the area of Political independence have also been flagged high risk: **Editorial autonomy** and **Independence of PSM governance and funding**. In the area of Social inclusiveness, a high risk score has been assigned to the indicators **Access to media for minorities**, **Access to media for local/regional communities and for community media**, and **Access to media for women**.

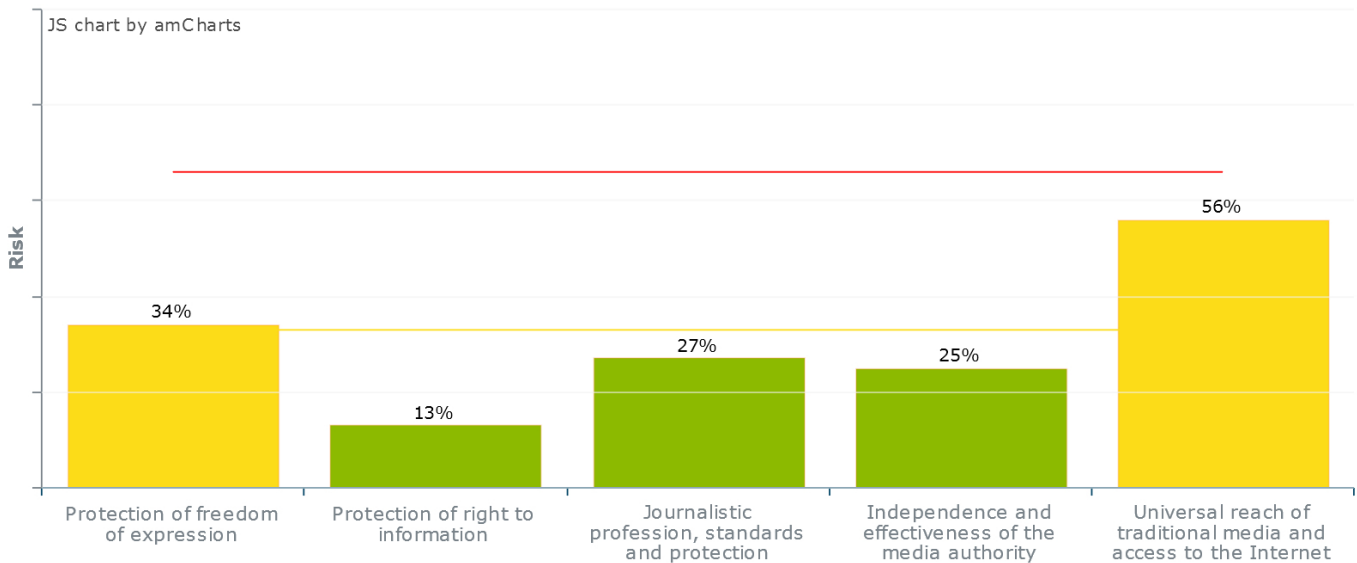
With respect to online media pluralism, all four areas score medium risk. One of the issues that cuts across several indicators is the lack of (publicly available) data concerning different aspects of the digital market, employment trends online, content removal and filtering/blocking.

In the sections that follow we elaborate on the scores obtained.

3.1. Basic Protection (31% - low 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.

Low Medium High



Freedom of expression is recognized by the Greek Constitution and major international and European human rights treaties ratified by the Greek state. Restrictions are clearly defined in the law and they tend to be proportional to the aim pursued. Recent modifications to the Penal Code have abolished restrictions previously foreseen on grounds of blasphemy. However, the state has not decriminalized defamation. ECtHR case law shows that existing legal remedies for violations of free speech are not always effective. In *Paraskevopoulos v. Greece* (appl. no. 64184/11, 28 June 2018), in a classic case of ‘criticism of a locally elected politician [by a newspaper article] in the context of a debate on a matter of public interest’ (see para. 42), the ECtHR found a violation of Article 10 ECHR, as the domestic courts had not adduced ‘relevant and sufficient’ reasons to show that the interference complained of was necessary in a democratic society. At the same time, they had imposed a (suspended two-month) prison sentence, which according to the ECtHR had a chilling effect on public discussion. The above give Greece a medium risk score of 34% for the indicator **Protection of freedom of expression**.

The indicator **Protection of the right to information** is given a low risk score of 13%. The right to information is enshrined in the Greek Constitution. This also provides for a right of access to documents held by public bodies. Restrictions are defined in accordance with international standards and appeal mechanisms are in place. The Greek state also benefits from a regulatory framework for the protection of whistleblowers. This could be subject to improvements, as it has a narrow field of implementation.

A low risk score of 27% is attributed to the indicator **Journalistic profession, standards and protection**. This is due to the absence of barriers to access the profession, the protection of journalistic sources (despite the lack of comprehensive regulatory standards in this respect) and the fact that journalists’ unemployment rates appear to have decreased over the last years (see ESIEA, 2019). However, journalists’ working conditions remain problematic and journalists are not free from attacks and threats to their physical integrity (European Centre for Press and Media Freedom, 2019; Council of Europe, 2019). Moreover, respect for professional standards is not effectively guaranteed. This is primarily due to the weak advocacy activity of journalists’ professional associations and the fact that existing self-regulatory norms on professional standards lack the commitment of media houses.

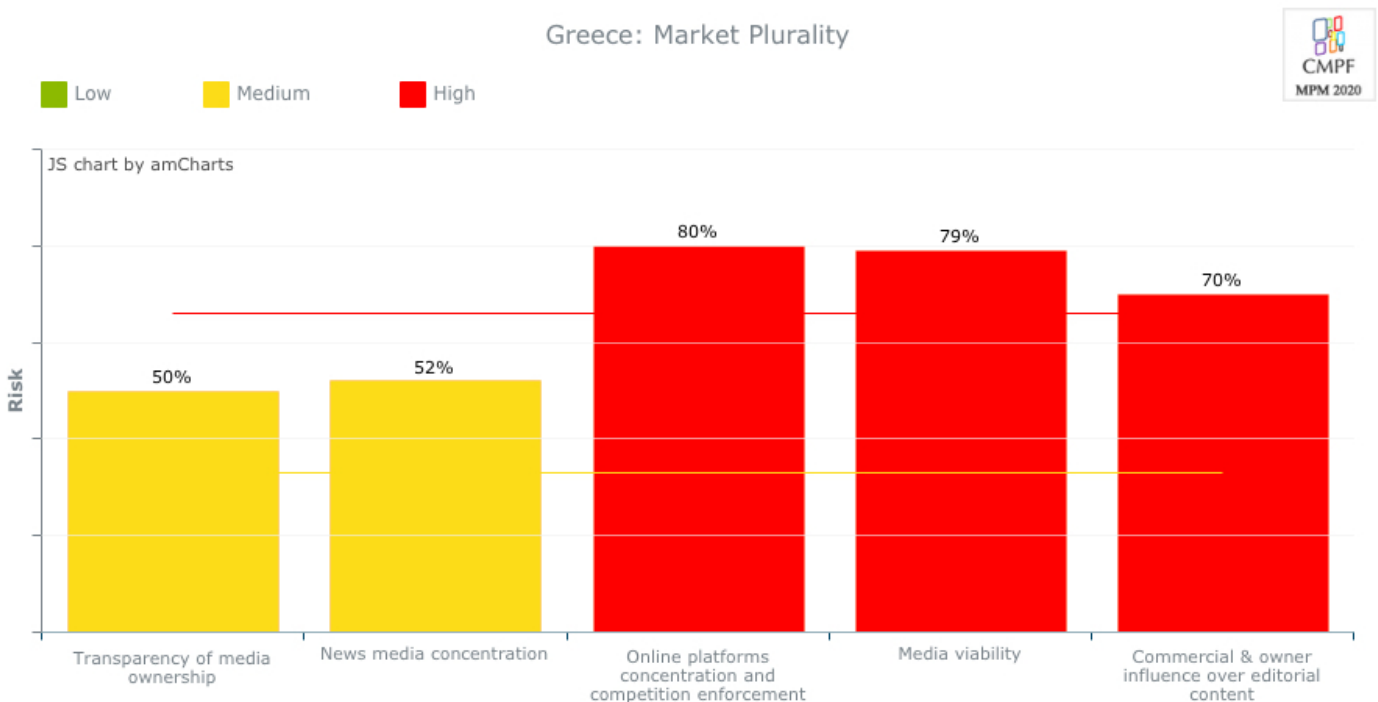
The indicator **Independence and effectiveness of the media authority** has a low risk score of 25%. The score reflects the fact that the tasks of the media regulatory authority (i.e. the National Council for Radio and Television, ESR) are specified in law. These cover the imposition of sanctions and they are performed in ways that do not question the independence of the authority. However, there are no specific safeguards to avoid arbitrary decision-making on behalf of the state as regards the budgetary resources of the authority. Moreover, whilst rules on incompatibility exist, the appointment procedures are not sufficiently transparent and the qualifications required are determined in general terms,

which does not preclude member selection on the basis of political considerations.

The indicator on **Universal reach of traditional media and access to the Internet** has a medium risk score of 56%. Domestic legislation guarantees universal coverage of PSM. It also sets forth safeguards for net neutrality. However, broadband penetration is low, as with the average Internet connection (on which see below).

3.2. Market Plurality (66% - medium 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 indicator **Transparency of media ownership** has a medium risk score of 50%. Domestic legislation is not characterized by clear provisions on the disclosure of news media ownership. Whilst audiovisual media are mandated to report on their ownership structures to the ESR, the print media are not required to indicate their owner on their copies. It is worth noting, however, that in order to register with the Registry of the Regional and the Local Press and the Registry of Online News Media, media operators must provide domestic authorities with ownership information. Disclosure of news media ownership to the public – what is more up to the final layer, only partially takes place.

The indicator **News media concentration** receives a medium risk score of 52%. Media legislation provides specific ownership limitations to prevent a high degree of horizontal concentration in the broadcast media and the newspaper markets. Concerning broadcast media, compliance is verified by the ESR. Specific thresholds to prevent a high degree of horizontal and cross-media concentration are also laid down. Relevant provisions complement general competition rules and focus on ‘concentration of control’ in the news media market, defining the concept of dominant position. Compliance is overseen by the Hellenic Competition Commission (HCC). Both the ESR and the HCC enjoy the necessary powers to impose proportionate remedies in case of violations. What increases the risk is the lack of publicly available data on the market shares of media operators.

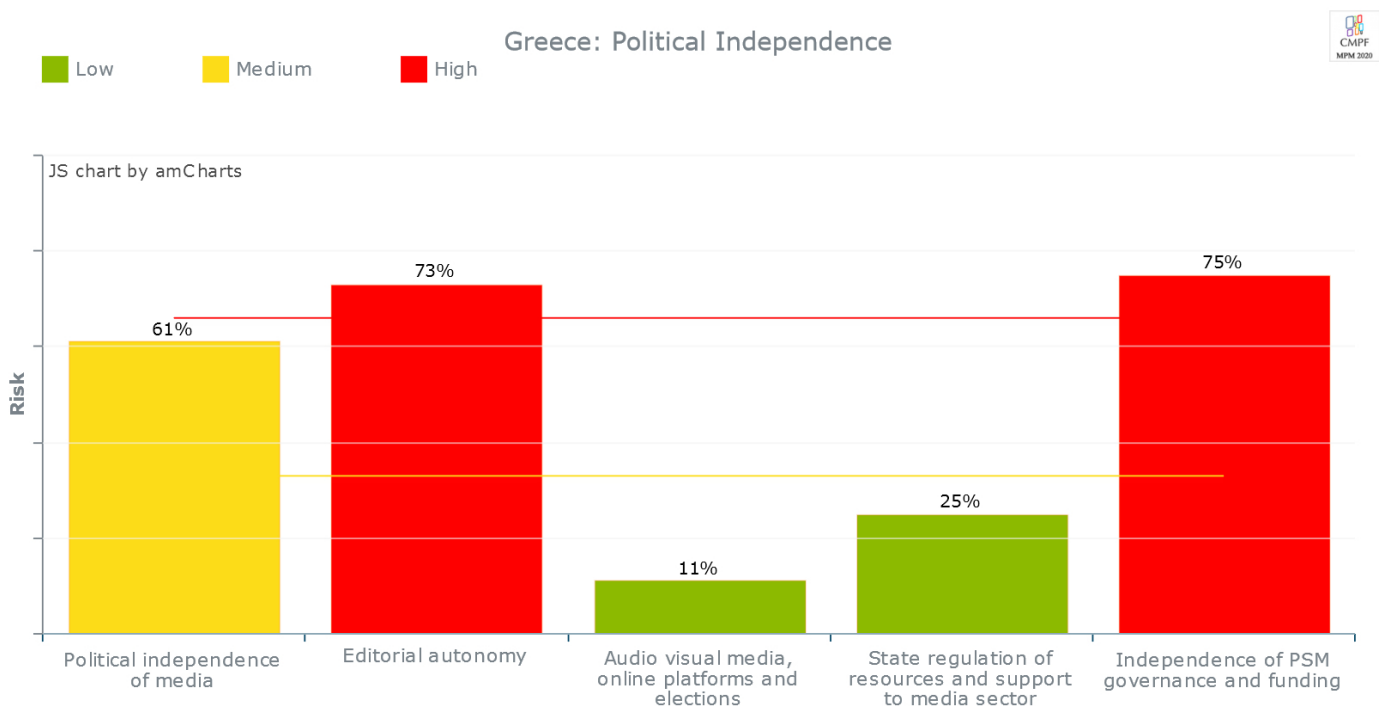
The indicator **Online platforms concentration and competition enforcement** is given a high risk score of 79%. Important risk-increasing factors are: the fact that access to news online mostly takes place via search engines, news aggregators, social media, etc.; the lack of data on the market and audience shares of news media and online platforms that compete for digital advertising; and the absence of any evidence to assert that efforts are made to adapt competition rules and enforcement practice to the realities of the digital challenge.

A high risk score of 79% is assigned to the indicator **Media viability**. Besides the limited number of initiatives aimed at developing sources of media revenue other than traditional revenue streams, Greece lacks public support schemes for the news media sector, other than PSM. The absence of publicly available data on media revenues, and on online and aggregated (online/offline) advertising expenditure in the media contributes to the high risk. This is also the case with the lack of publicly available data on the number of employed journalists.

A high risk score of 70% is given to the indicator **Commercial and owner influence over editorial content**. The score takes into account that the journalists' self-regulatory code of conduct obliges journalists to resist influence by commercial interests. It also reflects the fact that journalists can be involved in advertising only for charitable purposes. However, securing the independence of journalists does not appear to be high on the agenda of their professional associations which are responsible for enforcing the code. Moreover, there are no regulatory or self-regulatory mechanisms that grant social protection to journalists in case of changes of ownership or editorial line. Similarly, there are no safeguards to ensure that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests.

3.3. Political Independence (49% - 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 indicator **Political independence of the media** is given a medium risk score of 61%. Constitutional provisions

render the duties of Member of Parliament (MP) incompatible with direct media ownership. While direct media ownership by political parties is not prohibited, none of the currently leading audiovisual and print media is under the ownership of political parties represented in Parliament. Both the lack of safeguards against indirect control of media enterprises by political parties and MPs and the lack of data that would allow an assessment of the extent to which such control is present in the market constitute a risk-contributing factor. Another one is the lack of safeguards against control of news agencies by political groupings. Greece's only news agency, ANA-MPA, is public and the political independence of its board is not fully ensured as the president is selected by the Minister responsible for the media.

The indicator **Editorial autonomy** receives a high risk score (73%). First, Greece lacks regulatory safeguards seeking to prevent political influence over the appointments and dismissals of editors-in-chief. Second, self-regulatory measures stipulating editorial independence from political interference are also lacking, creating space for potential (direct or indirect) political interference.

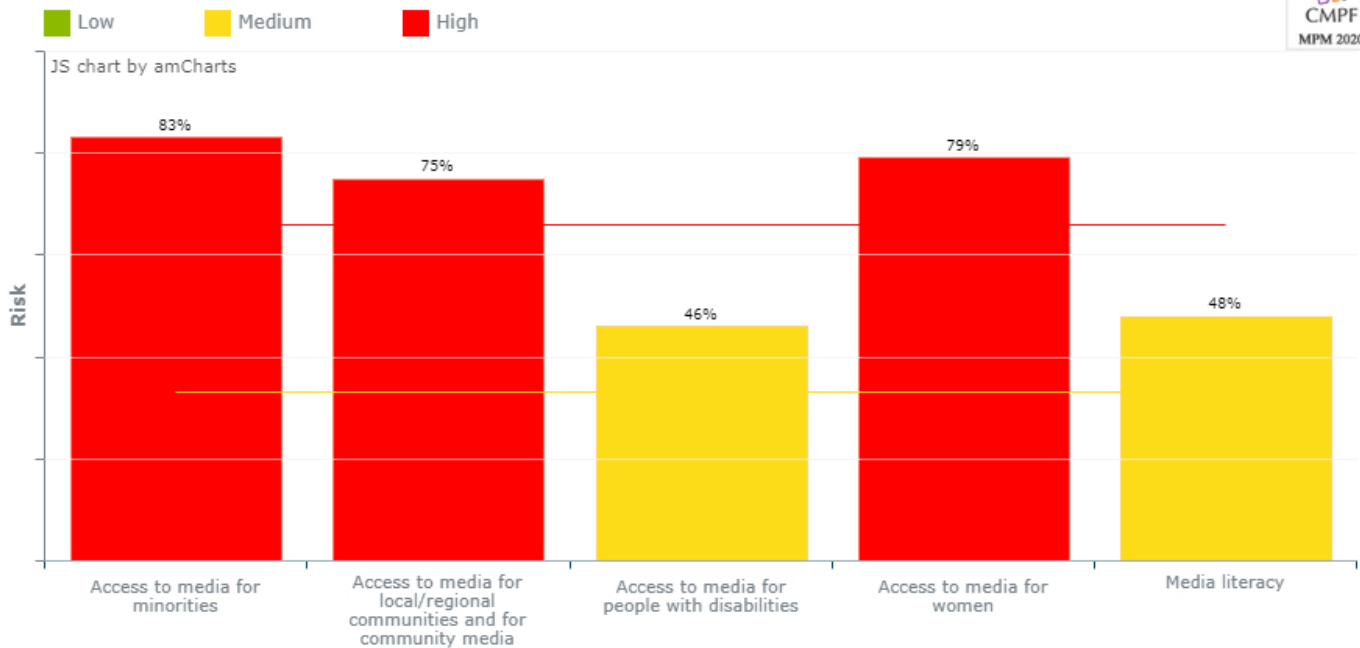
A low risk score of 11% is given to the indicator **Audiovisual media, online platforms and elections**. The score reflects the existence of rules aiming at impartiality and political pluralism in news and informative programmes on PSM channels and services as well as the monitoring of their implementation by the media regulatory authority. It also recognizes that regulatory safeguards for fair access to airtime for political actors during election campaigns are in place, applying to both PSM and private audiovisual media. Airtime is distributed to political parties on the basis of the principle of proportional equality, taking into account the results of the latest election. As to political advertising, PSM and private audiovisual media is obliged to broadcast political ads free of charge and on a proportional basis.

The indicator **State regulation of resources and support to the media sector** also receives a low risk score (25%). The rules governing the allocation of radio spectrum are in line with the principles and policy objectives of the Radio Spectrum Policy Programme of the EU, and the criteria for the award of licences to digital television content providers are objective. In terms of support to the media sector, the criteria for the distribution of indirect state subsidies (i.e. postal distribution subsidies, reduced value added tax and rates for communication services) are fair. Yet, the transparency of the policy is problematic as the amounts received by eligible print media outlets are not publicly available. General provisions for the introduction of a direct subsidy scheme to print media have been recently enacted but the implementing regulations are pending.

A high risk score of 75% is given to the indicator **Independence of PSM governance and funding**. This high score very much relates to the lack of safeguards for the objective selection of board members. The law foresees that the President and the Managing Director of ERT are chosen on the basis of typical qualifications and professional expertise following an open call for applications. The Committee on Institutions and Transparency, a cross-party parliamentary committee, is involved in the process, giving its opinion on the nominees. It is the Minister though that makes the nominations and appointments. Moreover, the resignation of the President and the Managing Director following elections that lead to a change in the government is a standard practice. Concerning financing, ERT's main source of funding is a licence fee, levied on electricity bills. The fee's amount is set in law and adjustments can be made upon proposal by the board, taking into account net costs necessary for the provision of public media services. Yet, the government has committed to reduce the licence fee by half (Iefimerida.gr, 2018).

3.4. Social Inclusiveness (66% - medium risk)

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



The indicator on **Access to media for minorities** is assigned a high risk score of 83%. Risk-contributing factors are: the lack of provisions guaranteeing access to airtime to legally recognized minorities and other minority groups; and the lack of programme for minority groups on both the PSM and leading private TV channels and radio. However, ERT's international radio service, the Voice of Greece, offers daily news bulletins in languages spoken by minority and immigrant populations.

The indicator **Access to media for local and regional communities** also scores a high risk (75%). First, network providers are not obliged to provide access to local broadcasters via must-carry rules. Second, direct subsidy schemes for regional/local print media ceased in 2014 as part of the reforms aimed to tackle the fiscal crisis. A 2019 law provides for the re-introduction of subsidies but the relevant provisions have not yet been adopted. Third, Greek media law does not contain specific provisions on community media (i.e. media that is non-profit, open and accountable to their community). Fourth, PSM is not obliged by law to keep its own local/regional correspondents. It should be noted, however, that ERT operates a good number of regional radio stations offering locally relevant and locally produced content.

The indicator **Access to media for people with disabilities** has a medium risk score of 46%. Policy in this area is still underdeveloped. For instance, the law imposes on TV content providers the obligation to broadcast part of their programme with simultaneous display of subtitles and to offer daily news bulletins in sign language, but does not require audio description to improve access to the visually impaired.

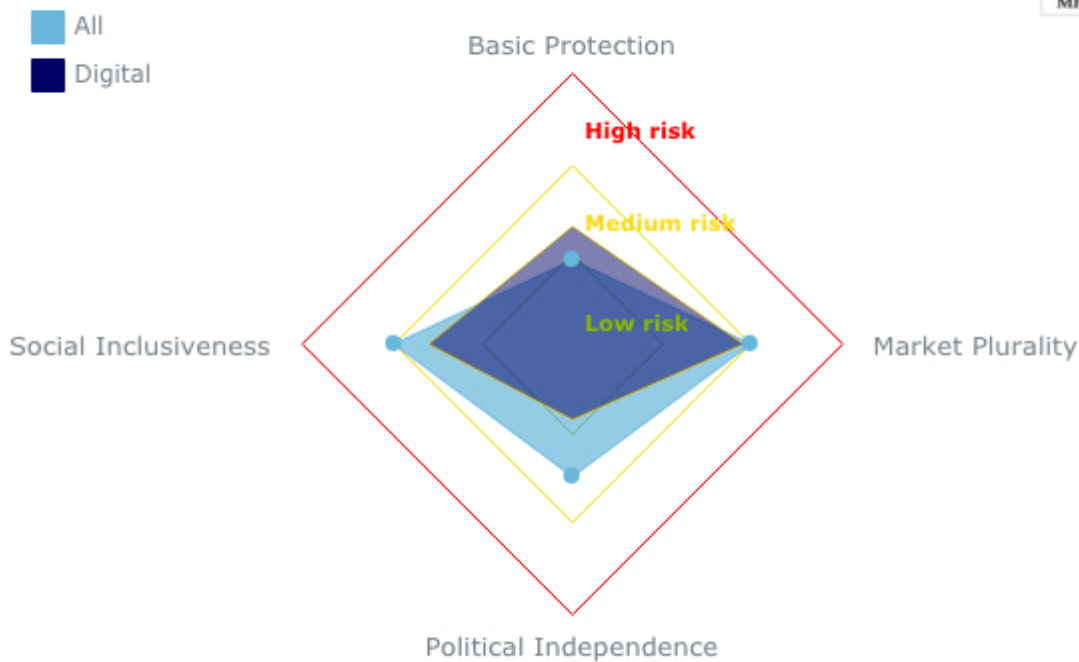
A high risk score (79%) is attributed to the indicator **Access to media for women**. On the one hand, PSM is bound to respect the principle of equal access to employment, as the law prescribes, and not to broadcast discriminating or gender-stereotyping content. On the other hand, ERT lacks a coherent policy on gender diversity in its workforce and programme, and women are currently under-represented in its Management Board. There are problems on other aspects as well. For, instance, publicly available data on the share of women in the managing boards and among executives and editors in chief in all leading news media is not available, which increases a risk. Moreover, available data suggest that, generally, women are not represented in news and current affairs broadcasting in a way that is proportionate and free from stereotypes.

The indicator on **Media literacy** also scores a medium risk (48%). Media literacy is on the political agenda but remains relatively underdeveloped as a policy. For instance, media literacy is present in formal, compulsory education but still it is not an integrated part of the school curriculum or teacher training. It is, nonetheless, vividly present in non-formal education, as several media literacy initiatives have been launched in recent years, also within the framework of EU-funded programmes. It is worth observing however that overall, these initiatives take place mainly in larger urban areas

and their focus tends to be on students, educators or journalists, and less on parents, senior citizens or other social groups (i.e. ethnic minorities).

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

Greece: Media Pluralism Risk Areas - Digital



JS chart by amCharts

The assessment of risks to online pluralism does not always mirror the overall risk score for each area.

In the area of **Basic protection**, digital indicators score a medium risk score of 43.33% (whereas the overall area score is 31% - low risk). Freedom of expression safeguards apply to the online environment and there is no evidence of interference with online content in an arbitrary way. However, there is scarcity of data on whether or not individuals enjoy effective mechanisms to address violations of free speech online, especially as regards any self-regulatory tools employed. Moreover, data enabling an accurate assessment of whether or not instances of blocking or filtering content are reported in a transparent manner is limited. Concerning the journalistic profession, no threats to the digital safety of journalists have been systematically detected. Moreover, the implementation of the GDPR and the transposition of the Data Protection Law Enforcement Directive (Directive 2016/680) have taken place with care for the proper exercise of journalism. What remains unclear is whether or not the data retention obligations established when transposing Directive 2006/24 (now annulled) comply with fundamental rights. As for the indicator 'universal reach of traditional media and access to the Internet', ISPs manage network traffic in an increasingly transparent and neutral way (EETT, 2019). However, broadband coverage was 65.9% in 2018 (European Commission, 2019) and the average Internet connection speed was 13.41 mbps in 2019 (Cable.co.uk, 2019). Data on concentration in the ISPs market is not publicly available.

A medium risk score of 63% is identified for the area of **Market plurality** (which has an overall area score of 66% - medium risk). National legislation does not set forth requirements for the disclosure of ownership information for all types of digital news media. Concurrently, disclosure of ownership information to domestic authorities - even up to the 'ultimate owner' - does not necessarily entail disclosure of ownership information to the public. It is indicative that the Online News Media Register, which contains information on ownership details, can only be accessed by registered members. The ownership limitations introduced to prevent a high degree of horizontal concentration do not reflect the changes brought to the media ecosystem by the digital revolution. This is also the case as regards the media-specific rules enacted to counter both horizontal and cross-media concentration on the basis of the concept of 'concentration of control'. Such deficiencies are supplemented by the lack of publicly available data on concentration in the digital native news media market and across different news media markets (i.e. the audiovisual, radio, newspapers and digital native media markets). Shortcomings in the availability of data have also been identified for the indicators Online platforms

concentration and competition enforcement, and Media viability (concerning for instance data on concentration in the online advertising market, digital native news media revenues and employment trends, online advertising expenditure, etc.). Furthermore, it appears that the Greek news media market has not adjusted itself to increasing digitalization as far as competition rules and enforcement are concerned, despite the fact that access to news online mostly takes place through intermediaries. No less importantly, there are limited efforts to develop alternative business models to cope with digital competition and lack of regulatory incentives to support online media and pluralism. As for the indicator Commercial & owner influence over editorial content, the score reflects the fact that the adoption of an online news media code of conduct, which contains provisions that seek to shield editorial decision-making from commercial interests, has not been matched by an enforcement body with supervision tasks.

The area of **Political Independence** (which has overall been assigned a medium risk score of 49%) scores a low risk of 28 % for digital indicators. With respect to the indicator Political independence of media, the lack of data on digital native media in Greece impacts also the assessment of whether or not direct political control is present in the market. Regarding the indicator 'editorial autonomy', data on whether the leading news media in Greece have adopted specific codes of conduct/guidelines for the use of social media by journalists is not available. Note, however, that the Online Publishers Association of Greece has recently introduced a code of conduct which applies to its members and which contains principles on the use of social media by journalists. Under the indicator Audiovisual media, online platforms and elections, the assessment of online media pluralism risks focuses on equal opportunities and transparency in online political advertising during electoral campaigns. The outlook is somewhat more positive here since domestic legislation imposes limits on campaign spending (thereby, indirectly, establishing a restriction on online political advertising), and on the frequency of appearance of candidates standing for local and regional elections in online media. Candidates and parties are required to report on their campaign spending, including on the amount spent on advertising on the Internet, and relevant information is then publicly available through the website of the relevant public bodies. However, there are no specific disclosure requirements for advertising expenditure on social media and no restrictions on the placement of political banners online during elections.

In the area of **Social inclusiveness** (which has an overall medium risk score of 66%), digital variables receive a 53% medium risk score. They are included under Media literacy. As regards digital competences, according to Eurostat data, 51% of the Greek population has basic or above basic overall digital skills. The percentage of the population that has low overall digital skills is low, at 24%. As regards hate speech, Greece has implemented the European Council Framework Decision 2008/913/JHA 'on combating certain forms and expressions of racism and xenophobia by means of criminal law' (Law 4285/2014). Whether the implementation of the law has been effective cannot be, however, assessed as available court decisions are scarce and inconsistent. Data that would enable an assessment of whether there have been efforts to remove hate speech towards potentially vulnerable groups (i.e. ethnic/religious minorities, women, or people with disabilities) from social media is lacking.

5. Conclusions

Our findings show that Greece faces various challenges with respect to media pluralism. In the area of **Basic Protection**, key concerns remain the non-decriminalization of defamation, insufficient mechanisms to ensure respect for professional standards in the practice of journalism, and precarious working conditions for journalists. These are long-standing, structural deficiencies that have been highlighted also in previous applications of the MPM. They require careful consideration by policy-makers and the media alike.

In the area of **Market Plurality**, what is particularly alarming is the lack of publicly available data inter alia on concentration trends. The absence of comprehensive media ownership disclosure requirements also undermines transparency. The end result is inability to assess the actual state of affairs. It is imperative that efforts are channeled towards strengthening transparency in the market and the collection of data that are useful for policy purposes.

In the area of **Political Independence**, the lack of safeguards for securing the independence of PSM and the country's only news agency from political interference is certainly a core issue that has important implications for pluralism. Successive governments have pledged to address this but have not done so. At the same time, private media are not shielded from political interference given the lack of self-regulatory measures that would effectively safeguard their editorial independence. These are matters that require a change of mentality by both the Greek political and media system.

In the area of **Social Inclusiveness**, the lack of state support for local/regional and community media is important from a media pluralism perspective. Supportive measures are needed in this respect.

Finally, particularly as regards online media pluralism, action should be taken to improve data collection and address the specificities of digitization through legislation and rule enforcement.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Evangelia	Psychogiopoulou	Senior research fellow	Hellenic Foundation for European and Foreign Policy (ELIAMEP)	X
Anna	Kandyla	Research fellow	Hellenic Foundation for European and Foreign Policy (ELIAMEP)	

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
Alexandros	Oikonomou	Media lawyer	
Giannis	Kotsifos	Member	Journalists' Union of Macedonia and Thrace Daily Newspapers (ESIEMTH)
Alexandra	Mpriasouli	Member	Social Control Council of the Hellenic Broadcasting Corporation (ERT)
Katharine	Sarikakis	Chair of Media Governance, Organisation and Media Industries	University of Vienna, Department of Communication
Nicole	Ioannidi	Head of Corporate Affairs	Vodafone Greece

