



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: Latvia

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Annexe 1. Country Team

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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 Latvia the CMPF partnered with Anda Rozukalne (Riga Stradins University), 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

Latvia's 1,92 million inhabitants (Central Statistics Bureau, 2019) live in the area of 64.5 thousand square meters. At the beginning of 2019, 1 million 315 thousand were urban population (68 %) and 605 thousand – rural population. Capital Riga population (633 thousand) comprised 33 % of the total number of inhabitants in the country, which was one of highest indicators in Europe.

Media choice in Latvia is largely determined by the ethnic group and geographical factors. Latvia is not ethnically homogenous: 62% of the population is Latvian, 25% Russian, 3,2% Belarussian, 2,2% Ukrainian, 2,1% Polish, 4% other. 61% of the Latvian population speaks Latvian as the first language, 36% - Russian, 3% - other (Central Statistical Bureau, 2018). The largest historical regions of Latvia (Kurzeme, Zemgale, Vidzeme) have most of the population speaking Latvian at home (75%-91%). However, the Eastern region of Latgale paints a different picture: 60% of the population speaks Russian at home, 39% speaks Latvian (Central Statistical Bureau, 2018). In the capital city Riga, most of the population speaks Russian at home (56%), whereas 43% use Latvian.

Given the present ethnic structure and general media usage habits of the population, Latvia's society and media environment is often described with the term 'linguistically divided audience'. Representatives of different ethnical groups in Latvia acquire their daily information from different sources; Latvians generally trust and use the media in Latvian, whereas the Russian-speaking prefer the TV channels controlled by the Russian government (Latvijas Fakti, 2017, 2018). Most Latvians (more than 90%) use the media in Latvian, whereas other nationalities use Latvian media less frequently: 44% listen to the radio in Latvian, 38% watch TV, 35% use news portals on the Internet, 34% read the press, and 24% use social media (Latvijas Fakti, 2018).

The population of Latvia still prefers television over other media (88% of respondents) (Latvijas Fakti, 2018), though the role of television is gradually diminishing and being replaced by digital media. 83% of the population listen to radio, 79% read news on the Internet, 72% use social media, 71% read the press in print or online. Reading the press, however, is comparatively less frequent: 16% of the respondents read the newspaper daily; 52% read it once a week. Media use is similar among males and females, as well as different nationalities.

The *Latvijas Fakti* (2018) study shows the influence of the Russian media in Latvia, as 38% of the respondents use Russian media. *Latvijas Fakti* (2018) analysis of the most popular media reveals that commercial media are the most popular, followed by public and regional media.

According to Eurobarometer data (Standard Eurobarometer, 2014, 2015, 2016, 2017, 2018; Statista 2019), the population of Latvia trusts the radio and television the most. Moreover, the average level of trust in traditional audio-visual media among the Latvian respondents is higher than the EU average by 6%-12% (from 58% in 2010 to 63% in 2016). Trust in printed press in Latvia is similar to the EU average (approx. 41%). Since 2010, the population of Latvia has trusted Internet media more than the EU average (from 46% in 2013 to 34% in 2018, as compared to EU 35%). A similar trend can be observed with social media use: Latvia's respondents reveal a higher level of trust (21%-27%) than the EU average (around 20%).

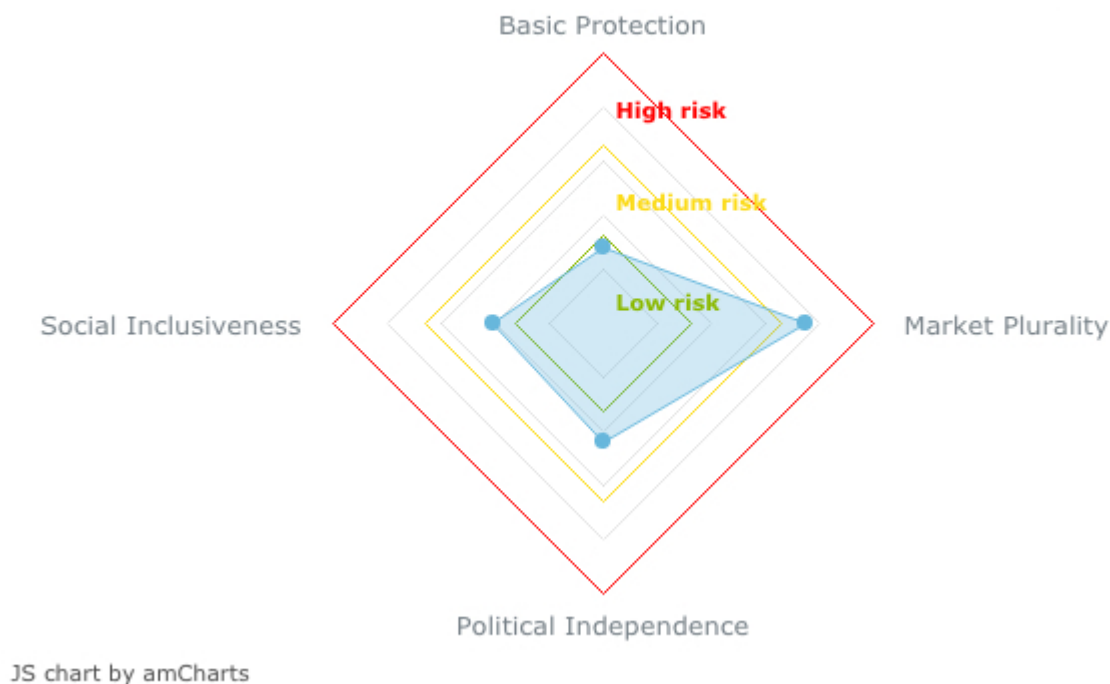
The liberal structure of Latvian media regulation allowed a diverse media system to develop; at the same time, the media environment is characterized by oligopolistic competition and a high level of concentration (Jastramskis et.al, 2017). Latvian media system is described as hybrid, because it lacks a dominant paradigm (Skudra et al., 2014). Firstly, the important role of the market in media landscape regulation and the lack of support for professionally competitive media, are indicative of a liberal model. Secondly, democratic corporate model features are evidenced by the efforts to strengthen public service media and a few media professionalization activities in the country. Thirdly, the presence of political parallelism in the media environment and the great influence of political public relations on media content mark the signs of a polarized pluralistic model. Analyzing political systems, economic development and consequences of media privatization in 21 CEE states, Dobek – Ostrowska (2015) placed Latvia in the Hybrid Liberal Model. It means that the country have acquired a "free" country status; at the same time, Latvia belongs to the group of flawed democracies.

Three rivalling journalism cultures can be distinguished in Latvia by their attitude towards accountability (Dimants,

2018). The ethnic minority media are represented by the traditional Russian journalism culture. The instrumental and authoritarian (post-Soviet) journalistic culture characterizes the media that are not independent from political and economic subsystems of the society. The third is professional media culture, oriented towards high professional standards and editorial autonomy, can also be identified.

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

Latvia: Media Pluralism Risk Areas



The implementation of the Media Pluralism Monitor 2020 (MPM 2020) in Latvia shows that the country is at low risk for Basic Protection, at a medium risk for Political Independence and Social Inclusiveness, and at high risk for Market Plurality.

Basic Protection data show the lowest level of risk, 28%. Three of the indicators in this group represent a low risk situation, two of which correspond to a medium risk assessment. Data on risk analysis of **Universal reach of traditional media and access to Internet** show a low risk situation (15%). According to Kantar Latvia data (2019a), 85% of country inhabitants read press (newspapers and magazines); 68% per cent – listen radio every day, 87 percent – listen radio every week (Kantar 2019b). In 2019, on average 67.4% of Latvia's population from 4 to 74 years old watched TV on daily basis (Kantar 2019c). In 2019, each TV viewer spent an average of 4 hours and 23 minutes a day in front of a TV screen.

Media accessibility indicators show the situation of the country's extensive internet coverage and availability, and accessibility of traditional media. 80% of the population in Latvia uses the Internet every day or almost every day, the use of the Internet in rural areas is rapidly increasing, and the number of Internet users over 60 years is growing. According to data of Central Statistical Bureau (2020), the share of households with Internet access is growing every year – it is 85.4% of Latvia's households¹ by 2019.

Risk analysis for **Journalistic profession standards and protection** accounts for 21%, it is low risk level. In Latvia, access to the profession of journalist is free, not limited by the requirements to obtain particular education or practical experience, and journalists do not need to register or hold a license.

The risk analysis for the **Protection of Right to Information** is low - 22%. This means that in Latvia access to information is enshrined in the constitutional laws, Latvia has accepted international agreements regulating access to information and the right to information.

One indicator in the Basic Protection indicators set, which represents a medium risk situation, is the **Protection of freedom of expression** - it is 37%. Article 100 of the Latvian Constitution stipulates that censorship is prohibited.

Independence and effectiveness of media authority data show a medium risk situation of 47%. This level of risk is

determined by the discrepancy between the independence of the media authority guaranteed by media regulation and the actual quality of the work of this institution. Unfortunately, members of the parliament-elected media authority since 2017 have been involved in a number of professional scandals, which resulted in expressing mistrust to Latvia's media authority by PSM organisations representatives and Association of Latvian Journalists (LSM, 2019a; Skaties, 2019; LSM, 2019b; Anstrate, 2019; Petrova, 2019; Bērtule, 2017). Analysis of the activities and decisions of the media authority shows that this institution is not free from political influence and does not take full responsibility of the development of a professional audio-visual media sector.

An evaluation of **Market Plurality** data indicates a high-risk situation (75%). Four of the risks in this set of indicators are high, only one is medium.

Evaluation of the **Transparency of media ownership** indicators indicates a high-risk situation, which is 83%. This result is determined by the availability of information of media owners and beneficiaries. There is information available for audio visual media owners who have been licensed to broadcast TV or radio content, but there is not ownership information on other media owners available without payment.

The risk of **News media concentration** is high, at 67%. This result is determined by the current market situation as the Latvian news media market is dominated by few players. The number of news media has decreased in 2019 due to the closure of the LNT TV channel and closing the the oldest Latvian commercial news service.

Analysis of the indicators of **Online platforms concentration and competition enforcement** shows high-risk, it is 75%. These results are based on the data of influence of large global platforms on the Latvian advertising market, undermining the ability of local media to access a stable level of advertising revenue flow.

Analysis of **Media viability** indicators shows a medium risk situation of 57%. These data mean that since 2009 Latvia's media companies have been gradually recovering from the fall in revenue during the economic recession. The media firms have been reorganizing their business models, finding new sources of revenue. However, the situation remains difficult, compounded by competition from international platforms for advertising revenue and a slowdown in overall economic growth in Latvia in 2019 and beginning of 2020.

The analysis of **Commercial and owner influence over editorial content** shows a very high level of risk - 95%. This result demonstrates situation of a small media market, characterized by a high degree of competition and a little number of large advertisers. These circumstances create a difficult financial situation in media business, which is the reason why media owners' and managers' desire to attract advertiser investment results in high influence over editorial content.

The overall **Political Independence** risk analysis shows a medium risk situation of 44%. **Political independence of media** is at medium risk (close to high risk) level of 60%. This indicator illustrates the situation where significant media owners have direct or indirect links with people influential in Latvian politics.

A summary of the **Editorial independence** indicators shows the highest risk situation in this data set, which is 71%. It shows a number of interrelated data: editorial independence violations, and journalists' and editors' self-evaluation about editorial independence level in their media organisations.

Audio-visual media platforms and elections indicators show a low risk level of 30%. This demonstrates that there is a strict regulatory framework in Latvia governing audio-visual media activities during the pre-election period, as well as obligations to ensure equal representation of different political forces to voters.

Indicators of **State regulation of support for the media sector** indicate a low-risk situation of 25%. Printed media in Latvia is provided with state financial support for press delivery, and other media can benefit from a reduced VAT rate. Since 2017, a Media Support Foundation has been established to fund professional quality content creation in commercial media through projects. However, Internet news media have still not succeeded in applying a reduced VAT rate to their operations.

Independence of PSM governance and funding shows a low risk level of 33%. The indicator shows a contradictory situation. PSM governance independence and funding are clearly defined in media regulation. However, in reality there are cases of political influence on PSM, moreover, the funding of the Latvian PSM is one of the lowest in the European Union. Both of these factors affect the level of independence of PSM.

The **Social Inclusiveness** scoreboard shows a medium risk situation of 47%. In this dataset, three ratios represent a medium risk situation, two ratios indicate a low risk level.

Access to media for minorities indicators show a very low risk level of 8%. This is due to the wide range of media content available to minority audiences provided by PSM and commercial media.

The assessment of **Access to media for local / regional minorities and community media** shows a medium risk level of 63%. This situation is due to the difficult financial situation of independent local/regional media and the competition created of free information leaflets issued by local governments.

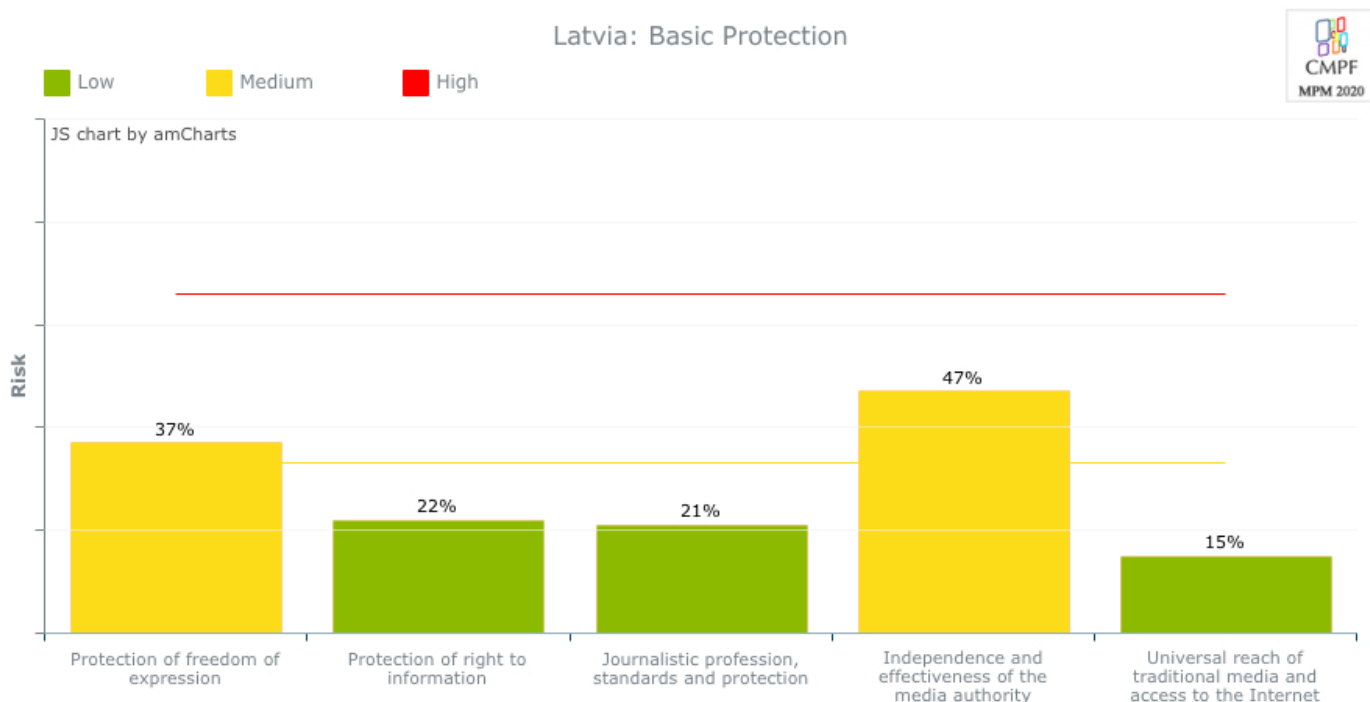
Access to media for people with disabilities data shows a low risk situation of 25%. Public service media organizations are gradually increasing their content for people with visual and hearing impairments, as well as media content in easy-to-read language. However, media regulation does not require commercial media to offer content suitable for people with disabilities.

Access to media for women data analysis shows a medium risk situation of 46%. More than half of media professionals in Latvia are women, there are many women in management positions in media firms. In addition, there are many women among the experts used in the media (Zitmane, 2018). Women as media sources often represent social problems - single parents, poor people. Latvia's indicators in this data set are influenced by the fact that PSM organisations do not have gender equality policies in place.

Media literacy indicators show a medium (close to high) risk situation (65%), as media literacy policy in Latvia does not cover a wide range of audiences and this policy is mainly aimed at the needs of children and young people.

3.1. Basic Protection (28% - 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.



The implementation of the Media Pluralism Monitor 2020 (MPM 2020) in Latvia shows a medium risk level for media pluralism in the country (28%). In 2019, Latvia still has a medium (close to low) pluralism risk in the field of **basic protection** that refers to the protection of freedom of expression (37%), protection of right to information (22%) and

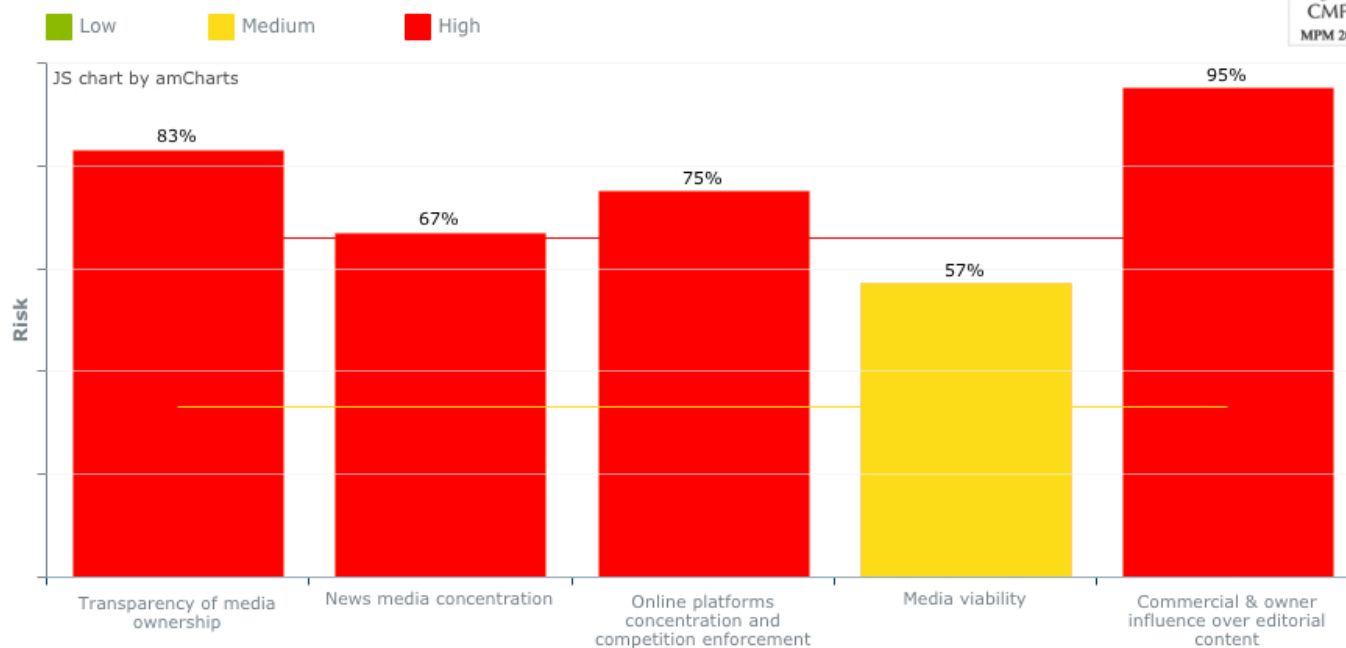
access to the Internet (15%), independence and effectiveness of media authority (47%), and journalistic profession, standards and protection (21%). The data show that access to information and freedom of expression in the country are guaranteed by a legal framework. Journalists' rights to gather information and protect their information sources is protected by law, and there have been no physical attacks on journalists in recent years. However, in reality, journalists in Latvia are constantly facing restrictions on access to information by officials and representatives of state institutions. The job market for journalists, though, remains volatile, with some media organizations limiting their social security payments to journalists in an attempt to cover a portion of their work with royalties. In addition, journalists are increasingly exposed to regular attacks in the virtual environment, these attacks are often initiated by politicians or provided by political communications companies with the aim of undermining journalists' professional reputation and invading their privacy (Rozukalne, 2020; Rozukalne, 2018; TVNET, 2018; Veinberga, 2018).

Access to journalism as a profession in Latvia is not limited by educational requirements; active journalist status does not require registration or licensing. On the one hand, it gives anyone who wants to work in journalism the opportunity to join this profession; on the other hand, lack of education and willingness to adapt to the demands of the commercial media environment leads to the breaches of professional ethics and to the development of an instrumental culture of journalism (Dimants 2018) in Latvia.

A medium-risk situation, according to MPM, concerns the protection of freedom of expression and the assessment of the independence of the media monitoring authority. Unfortunately, the influence of politicians on the selection of representatives of media authority and daily operation of the media regulator has not been eliminated in Latvia. This is evidenced by a number of examples where the influence on the decisions of the media authority National Electronic Mass Media Council has led to public distrust expressed by employees of the public media or independent experts.

3.2. Market Plurality (75% - 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** area in Latvia is at high risk (75%). Four out of five indicators in this area are at high risk, the only one at medium risk being Media viability. The alarming risks for market plurality come mostly from the lack of rules on transparency of media ownership and on safeguards for journalists against commercial and owner influence. Media market is dominated by few companies, and the high degree of concentration has not been reduced by the growth of digital news media.

The indicator on **Transparency of media ownership** is at high risk (83%). In Latvia there is no specific provision requiring disclosure of ownership of news media. For the media owned by capital companies, the general rules of the commercial law apply; and specific rules are set for broadcasters. But even in these cases, information is provided to authority, but not disclosed to the public. Transparency of ultimate ownership of news media is not required by the law, neither implemented in practice.

News media concentration scores a high risk (67%). Generally, the level of media market concentration in Latvia is high in all media segments. The law does not set limits according to number of licences, audience share, circulation etc. for press and the digital media market. The general competition rules define a dominant position on the market from 40% of market share, but there are not specific criteria and thresholds for new media companies, neither there is a law with thresholds for cross media concentration. The overall protection for competition hardly suits to the national media market where, due to small media audience, only a few players can succeed in each media segment.

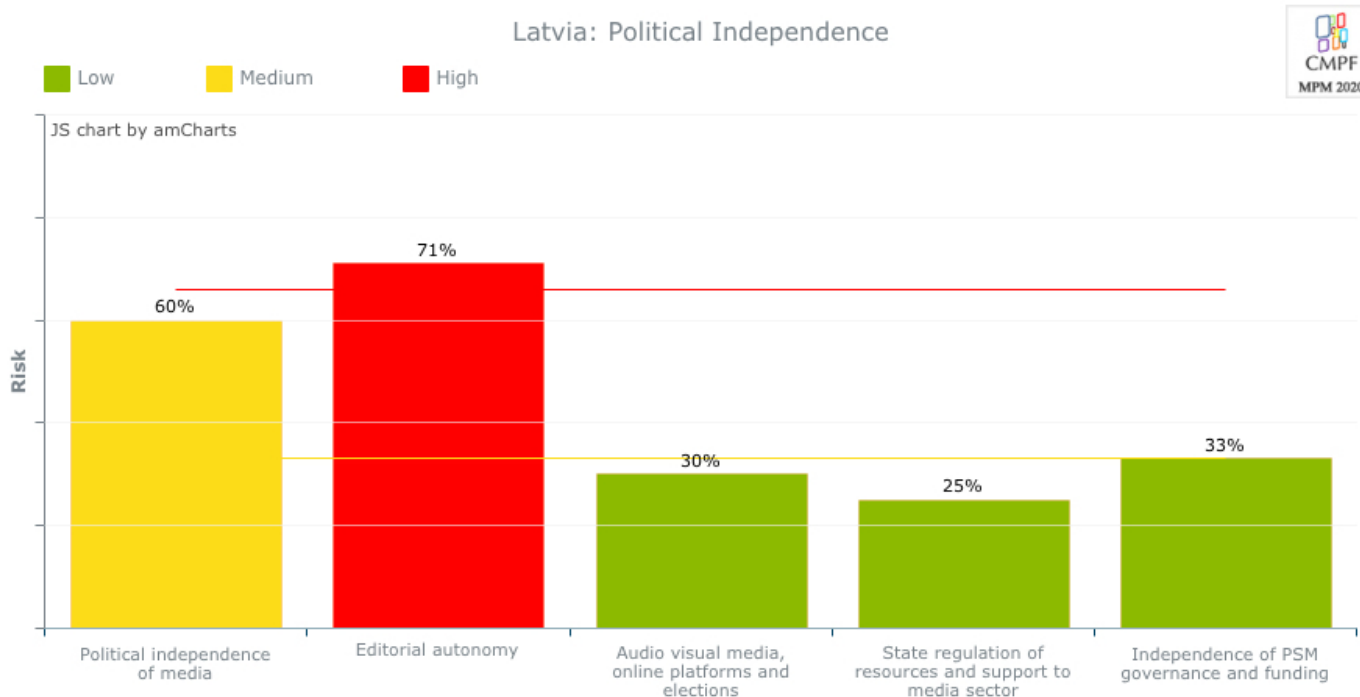
The risks grow in the indicator on **Online platforms and competition enforcement** (75%). In this indicator the average score results from the prevalence of side-door access to news (only 20-25% of direct access), the dominance of few operators in the online advertising market and the low level of competition enforcement in the digital environment. Digital media concentration in Latvia has increased over the recent years.

As part of professional media in Latvia adapted to the new business models and more or less successfully struggling for new revenue sources, the indicator of **Media viability** scores a medium risk (57%). Revenues and employment trends are particularly worrying for newspapers and local media, while the lack of data does not permit to evaluate the flow of online advertising resources to news media.

The indicator on **Commercial and owner influence over editorial content** has the highest score in this area (95%). The alarming level of risk for this indicator results from the absence of regulation or self-regulation on appointments and dismissals aimed to protect journalists and editor-in-chief against change of ownership or editorial line; the lack of rules on advertorials. Interviews with editors and journalists of various media organisations (national, local, print, TV and radio, online) realized for MPM2020 identify that media owners' commercial interests are the main factor that limit editorial independence and cause self-censorship.

3.3. Political Independence (44% - 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.



While evaluating the indicators that characterise the level of **Political independence**, deterioration of the situation was observed compared to previous rounds of the MPM. The highest concern is about **Editorial independence** (71%). The protection of editorial independence is formally declared in the Press and the other Mass Media Law. However, there is no developed mechanism of protection of editorial independence in reality. Editors increasingly have to align with interests of their owners. Many commercial media editors in Latvia are increasingly becoming providers of interest of advertisers by engaging in collaborative practice to support the sustainability of media companies (Rožukalne, 2020). In practice, this means that journalists simultaneously produce professional content and promotional articles, news, interviews for the needs of their media advertisers. Although media editors believe that political influence is insignificant and invisible, influential news media owners are still closely associated with politicians in Latvia.

The attempts to gain political control over media outlets have not decreased since the previous study in 2018. Therefore, the indicator on **Political independence of media** shows medium but close to high risk (60%). There is no law that regulates any relations between media owners and ruling parties, partisan groups or politicians. Any type of organisation or individual can become a media owner according to the legal framework in Latvia. In practice, influential politicians participate in media ownership indirectly (using proxies such as family members).

At the same time, three remaining indicators demonstrate significant changes created by media policy development in Latvia. **Audiovisual media, online platforms and elections** scores a low risk (30%). The Law on pre-election campaigning has been amended to accommodate the increasing pre-election communication activity in the digital environment. However, as in other countries, monitoring of pre-election agitation in the digital environment is incomplete due to lack of resources and data. It can be concluded that a regulatory framework has been created, but the capacity of the institutions involved to respond to pre-election violations in the digital environment needs to be

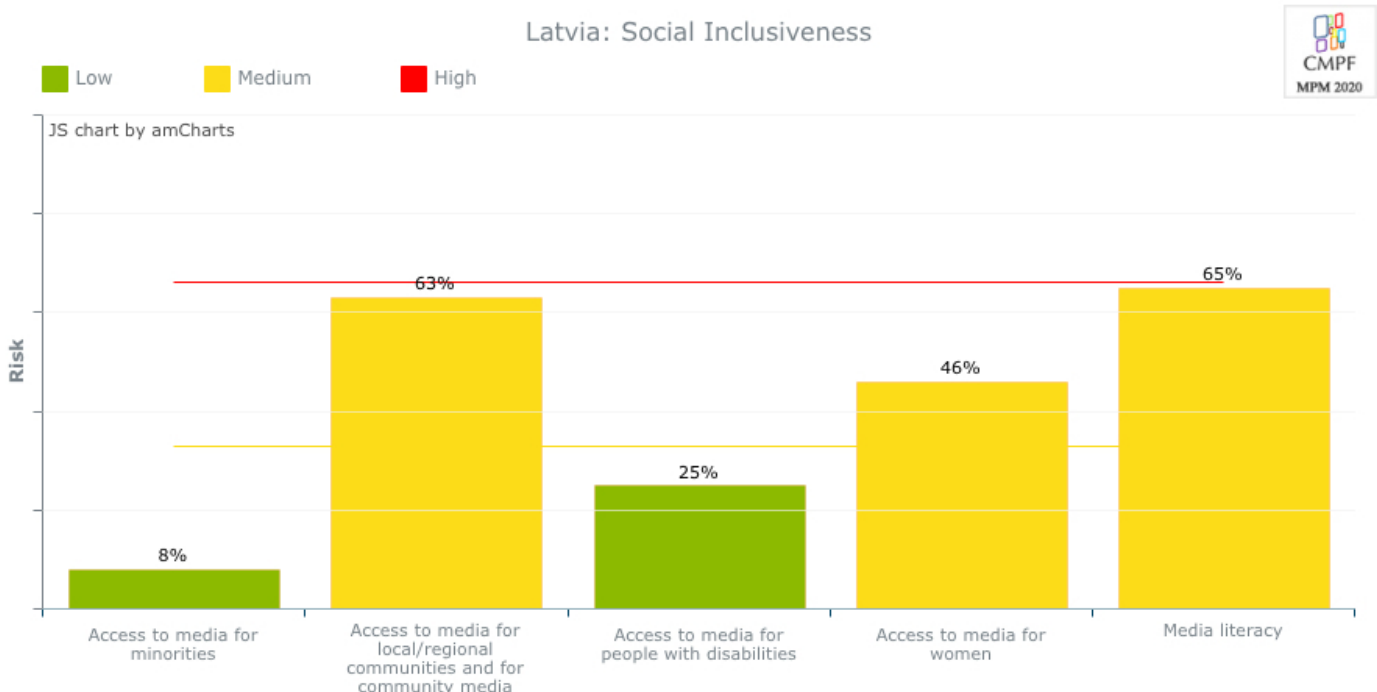
strengthened.

The operations of recently (2017) established Media Support Fund that provides support for quality media content changed the result of the indicator on **State regulation of resources and support to media sector** to low level (25%). The activities of the Media Support Fund have created positive impact to content quality of professional media organisations, but this support is rather low (about 1.2 million euro per year) and very fragmented. The format of support is provided on short term projects-base, therefore, activities of Fund lack sustainability. In fact, there is no significant changes in the system of state support to media. Even more, the long-awaited reduced value added tax applied not only to the press but to online news media operations as well, has not been accepted in Latvia.

The indicator on **Independence of PSM governance and funding** shows low risk but on the border with medium (33%). In general, the legal framework for the appointment procedures of PSM management and board functions are clear and transparent. The members of the National Electronic Mass Media Council are responsible for the final decision (voting) of PSM management. In some cases the decisions of NEMMC were questioned about eventual political influence. The media law provides transparent and fair procedures for PSM financing, but the amount of funding is very difficult to evaluate as adequate. Latvia can be found among the countries with the lowest level of public service media funding.

3.4. Social Inclusiveness (41% - 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.



Medium risk was scored in the analysis of indicators in the **Social inclusiveness** area (41%).

When compared with the MPM2017 results, the indicators on **Access to media for minorities** (8%) and **Access to media for people with disabilities** (25%) show significant improvement. In Latvia, minority interests are mainly served by the public media. Support for media offering content in Latgalian language (dialect of Latvian language) has gradually increased. Content in minority languages is stable. Content for people with visual and hearing impairments,

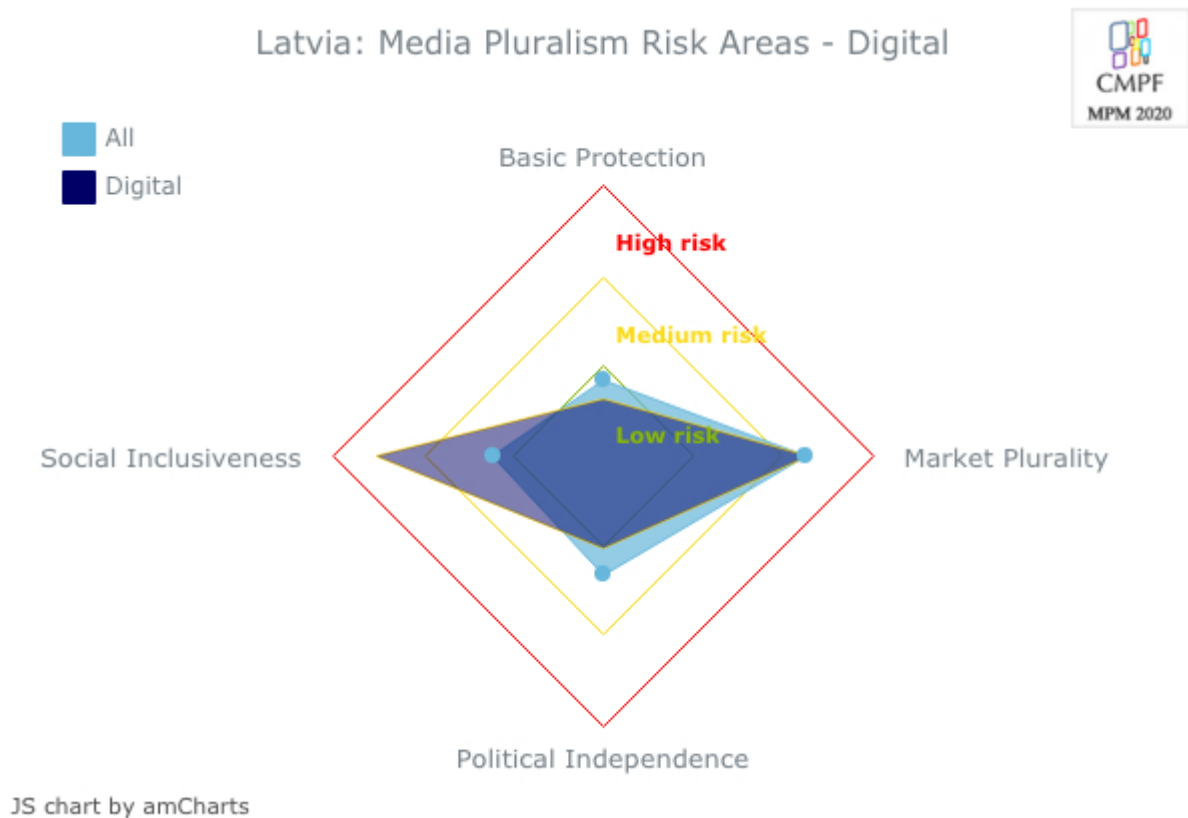
quality of easy-to-read content has increased in recent years. However, according to media legislation, commercial media organisations are not required to make the content accessible for people with disabilities and there are not examples when commercial digital or audio visual media firms provide content for disabled people.

Access to media for local/regional communities is evaluated as medium risk, yet very close to high (63%). An extensive network of local and regional media is developed in Latvia. However, community media development is threatened by demographic, economic and political factors. The number of economically active population in many regions of Latvia is decreasing, therefore the income of local media companies is diminishing. In Latvia, however, local governments have set up an extensive system of free informative leaflets, providing citizens with a wealth of journalism-like information and some attracting advertising revenue as well. This practice of using taxpayers' money to compete with independent media and distribute information influenced by local politicians limits the ability of local media to exist. As a result of these circumstances, the majority of independent local and regional media have reduced the number of issues per week, and there are currently no daily regional newspapers in Latvia.

Access to media for women (46%) show contradict picture. In Latvia, the majority of journalists (about 65%) are women. Many women work as editors-in-chief in important national and regional media. The board of Latvian Radio consist of women only. However, there are far fewer women in leadership positions in digital media, and there is no gender equality policy developed in PSM organizations.

Media literacy situation in a country is identified as medium risk (65%). Although media literacy has been one of the priorities of Latvian media policy since the end of 2016 and this notion has a stable place in public discourse, media literacy activities are mainly aimed at children and young people. Due to geopolitical circumstances, media literacy activities focus on news deconstruction and information space security risks. In Latvian media policy, basic documents define media literacy as the *“knowledge and skills needed to work with information sources – to find and analyze information, understand functions of the providers of information, critical evaluation of information, deferring between critical and biased information, comparing the news from different sources in order to make one’s own opinion. Media literacy includes also the skills of practical use of media.”* (Cabinet of Ministers, 2016). This definition is harmonized with European MIL policy documents and based on the critical perspective on MIL. However, until now mostly ICT competences in form of practical skills have been included into practical implementation in education at school as well as after school teaching. The reasons for that can be found in political culture and history of the country – the lack of longer tradition of democracy and citizen participation, power distance of economic and political elites, common sense understanding of the role of mass media and press freedom, the base of sociocultural values and traditions as they appear in the relationship between media and politics.

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



Media policy and regulation in the digital environment in Latvia are characterized by risks related to national security threats and changes in the geopolitical situation. Latvian politicians and officials are mostly concerned about the impact of Russian propaganda on the population and possible interference in the electoral process. A liberal regulation helps development of online media in Latvia, but low thresholds for media operations in digital environment has not encouraged the Internet media professional quality and social responsibility.

Traditional media in Latvia have delayed entry into the digital market, which is why digitally born companies (e.g. DELFI) dominate the country's digital media landscape. Their founders were associated with the information and communication technology companies at the turn of the century. In its early days, web portals offered information created by news agencies and traditional media, therefore their operations in the first decade of the 21st century can be characterised as aggregation of information. During its 20 years of existence, digital news sites have emerged as serious media companies which offer diverse content and influence the political and public agenda. Currently, they are the active digital media format creators and play an important role in the journalism job market. Traditional media have also invested in digital content and compete with original and more professional content in the digital environment.

According to GemiusAudience data, nine of the top 10 most visited websites are news media companies (GemiusAudience 2020). The largest of them (Delfi.lv, Tvnet.lv) attract more than 320 thousand users per month.

PSM online outlet lsm.lv was developed in Latvia in 2012, and in early 2020 it ranks seventh in the Top 10 online sites and fourth on the news media list. It has an audience of 90,000 unique users per month. An interview with the media editor Marta Cerava reveals that the development of the PSM portal is threatened by a constant lack of resources. lsm.lv offers information in Latvian, Russian and English, but Russian and English versions are funded by special programs, thus it is not possible to ensure media sustainability and staff development.

However, growing competition has increased concentration in the online media market and reduced the share of national media owners. Currently, the largest news media are owned by two Estonian media corporations: Eesti Ekspress and Postimees Group. The online media advertising market is stable, accounting for 32% of the entire Latvian advertising market. However, it is threatened by the activities of global digital platforms in Latvia. That is why the recent debate on the introduction of a digital tax has been developed in Latvia with the aim to find a solution on how to limit the loss of national media advertising revenue.

Liberal regulation has not only facilitated the development of digital media, but also poses problems with the responsibility of players in the online environment. The definition of digital media is general in media laws in Latvia, and media founders are not obliged to register to the media registry. This is the main reason why information providers who offer different hybrid media and hybrid journalism formats without identifying their goals, sources of revenue, and owners, have also developed their activities in Latvia's digital environment (Polis, May 26, 2017).

This has caused various problems, such as rapid development of fake news sites, and regular copyright infringement as Internet media republishes content by other media. As with traditional media, the content available on the Internet is influenced by political public relations and communication aimed at ruining the reputation of political competitors and interfering in their privacy. At the same time, Latvia is improving the regulation of the monitoring of political advertising in the online environment.

While some digital news portals have formulated user rules, only a few have codes of professional ethics. Although user-generated content is monitored and edited by Internet media organisations, the environment of Internet media users is characterized by aggressive communication, verbal attacks and hate speech. Law enforcement institutions in Latvia are gradually developing practices to prevent hate speech in the digital environment.

Analysis of digital environment pluralism indicators show that the Basic protection indicators data reflects low risk. Society of Latvia can use universal reach to media and access to the Internet; up to eighteen per cent of population use the Internet on regular basis. General Laws protect freedom of expression, it is clearly defined in law and the particular norms apply to online environment.

Latvia has adequate regulation to guarantee net neutrality, and in recent years there has been no violation of net neutrality by the government.

Political independence indicators data show a low-risk situation in Latvia, as none of the leading news media is affiliated with politicians. However, ambiguous professional norms and problems with Internet media regulation lead to situations where political parties' investments in the digital environment can also affect professional media content. What's more, individual position politicians regularly fund special sections on leading news sites (for example, the Riga City Council section on Delfi.lv), while individual politicians are owners of digital media (for example, parliamentarian, party KPV.LV establisher and former leader Artuss Kaimiņš is the owner of site rītakafija.lv (Morning Coffee). Investments in the creation or content of digital media and websites help politicians influence the processes of political communication in Latvia and draw the attention of the audience / voters.

Digital media market plurality data shows a medium risk situation, due to the increasing concentration in the digital environment and the lack of data on news media market data. Only data on Internet media users are available in Latvia.

Indicators of social inclusiveness in the digital environment are indicative of a high-risk situation as Internet users are regularly exposed to aggressive communication and hate speech in the digital environment is not assured. Individual cases show that members of various minorities, women and journalists are the main victims of attacks in the digital environment. Although in Latvia media literacy is often understood as a digital skill, users lack the knowledge to protect themselves from attack, violence and fraud in the digital environment, especially on social media.

5. Conclusions

Since 2017, three new media laws have been drafted in Latvia. The general Press and Media Law, as well as the new Electronic Media Law, have so far not been subject to parliamentary debate. Only the new Law on Public Service Media and its Governance has reached its second reading in the Saeima (Latvian parliament). This law project solves several important problems. Firstly, the creation of a new Public Media Council; made up of representatives of the President, Parliament and NGOs it is important initiative in PSM governance in the country. This composition of the brand new Council makes it possible for the public media supervisor to be less dependent on political decisions. The existing law defines that the Saeima deputies elect the PSM Supervisory Board. Secondly, a PSM Ombudsman institution will be created. Third, in order to strengthen responsibility and professionalism of PSM the position of editor in chief of PSM organisations are going to be established. Finally, after long debates of all stakeholders the PSM financing model has not changed, as before, so the PSM will continue be funded by the state budget. Therefore, the existence of the PSM will continue to depend on the decision of politicians in making the state budget.

Since 2016 the institution that is responsible for the development and implementation of media policy is the Unit of Media Policy at Ministry of Culture of Latvia. It can be concluded that the Latvian media system has been positively influenced by the development of media policy. Within three years, the Media Support Foundation has been established to offer financial support to professional media. The number of media literacy activities has been increased through various projects. Since the beginning of 2019, a new institution, the Latvian Media Ethics Council, established by professional media organizations, has started its operations.

Although Latvia generally enjoys protection of media competition, however, there are small country-specific media market conditions, therefore, in order to preserve media diversity efforts should be made to limit the influence of international media organizations on the Latvian media environment.

In the field of media pluralism, the situation has worsened. This means that the concentration of all media segments are still high, and digital media concentration has increased, and traditional media businesses are being undermined by activities global digital platforms.

By analysing different risks to media pluralism in Latvia, the following policy recommendations have been developed.

Recommendations

Basic Protection

- In order to improve the level of media accountability and understanding of professional media role in democracy it is necessary to adopt a law on the media environment, which is adapted to the modern media environment reality and precisely defines the media and journalist's status. In addition, the new law shall emphasize the principles of professional ethics for media organisations.
- In the new media regulation, it is essential to identify the distinction between rights and obligations between professional digital media and other information providers in the digital environment. At the same time, media and journalists must be protected from attacks in the digital environment in a more effective way.

Market Plurality

- The regulation of media ownership transparency should be changed by obligation for all media companies to publish their ownership structures on their websites or in the records that are accessible to the public without a payment.
- Media law in Latvia does not define the status of online media. As well as, the understanding of other media in existing regulation documents does not comply to contemporary media landscape. The precise definition and obligation to follow general media regulations, including transparency of ownership and establishment of professional ethic code should be included in the amendments to Law on Press and other Mass Media or in the

new Mass Media Law that is under development.

- In order to prevent high degree of horizontal and cross-media concentration in Latvia, specific thresholds and other limitations should be developed;
- The regulatory safeguards, including self-regulatory instruments, which seek to ensure that decisions regarding appointments and dismissals of editors in chief are not influenced by commercial interests of media owners.

Latvian media policy should pay particular attention to support for local and regional media. Ensuring the sustainability of independent media should create a system where independent media receive support not only for specific content projects, but also for their existence and for covering administrative costs.

Political Independence

- The legislation that provides fair and transparent rules on distribution of state advertising to media outlets should be created in Latvia.
- In order to decrease the level of political parallelism in Latvia's media system specific limits for political parties, local governments, state institutions and state-controlled companies to establish media outlets should be developed.
- The inadequate and short-term based funding creates serious risks of possibility to politically manipulate PSM, therefore, the funding system of PSM should be changed by using the share of particular taxes incomes or the other sustainable model for PSM funding, for instance, the share of GDP.
- Local independent media organizations should be protected from unfair competition that comes from the free informative gazettes issued and funded of local governments, limiting governments media activities to the obligation to provide information on their work to local people.

Social Inclusiveness

- A clear and well-established media and information literacy policy for different groups of society, including programs of lifelong learning for the all generations and representatives of the all the all regions should be elaborated in Latvia;
- The funding for content preparation for people with disabilities in PSM should be increased, specifically, by elaboration of broader service of "easy language" programs;
- Precise rules that provide access to commercial audio-visual media content for people with disabilities should be elaborated for commercial media market players;
- The PSM organisations should develop a clear and comprehensive gender equality policy that covers both personnel issues and programming content;
- PSM have to develop the programmes and interactive content of media and information literacy, including media critics and media analysis.
- Overall, the access of minorities in Latvia to media information is satisfactory. The only exception, according to the expert, is the representation of LGBT interests, which can be said to be practically invisible to mainstream media content and their interests. Just as Latvian public media should develop a gender equality policy, similar policies are needed to reflect the different minorities. A balanced representation of the various minorities (ethnic, political, regional, local, political, religious, gender, age-based etc) would require a discussion on revising the editorial practice guidelines.

Digital media pluralism

- The Latvian digital media environment requires the introduction of mechanisms to protect current sources of digital media revenue and limit the impact of digital global platforms on the development of the professional media in Latvia.
- Strengthening the sustainability of digital professional media requires the creation of the same support system as used by traditional media, such as a reduced value added tax or support of distribution services.
- In the digital media environment, a clear and user-friendly system of regulation and self-regulation is needed to distinguish rights and obligations of professional media and hybrid sites.
- The measures that protect users digital media from dissemination and impact of disinformation and malinformation has to be strengthened.
- A regulatory framework to protect pre-election agitation in digital sphere has been created, but the capacity of the institutions involved to respond to pre-election violations in the digital environment needs to be strengthened.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Anda	Rozukalne		Riga Stradins University	X

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
Andris	Kenins	Director	Latvian Broadcasting Media Association
Jānis	Buholcs	associate professor	Vidzeme University of Applied Sciences

